Three Brothers Allotment #5232
Standards and Guidelines Evaluation

1.0 Introduction

The Allotment Assessment was conducted in accordance with the direction set forth in the Washington Office Instruction Memorandum No. 98-91 and Arizona No. 99-012 for implementation of Standards for Rangeland Health and Guidelines for Grazing Administration. The purpose of the standards and guidelines is to improve the health of the public rangelands. The standards and guidelines are intended to help the Bureau, rangeland users and others focus on a common understanding of acceptable resource conditions and work together to achieve that vision. The Arizona State Director approved the Decision Record for implementation of Arizona Standards for Rangeland Health and Guidelines for Grazing Administration Environmental Assessment in April 1997. This decision became effective upon approval of the Arizona standards and guidelines by the Secretary of Interior in April 1997. The Decision Record allowed for full implementation of Arizona Standards for Rangeland Health and Guidelines for Grazing Administration in all Arizona Bureau of Land Management (BLM) Land Use Plans.

Definition of Standards and Guidelines

Standards of rangeland health are expressions of levels of physical and biological conditions or degree of function required for healthy, sustainable rangelands and defines minimum resource conditions that must be achieved and maintained. Determination of rangeland health is based upon conformance with the standards. Application of the standard to the range site considers the potential of the site without regard for the types or levels of use or management actions or decisions.

Guidelines, on the other hand, do consider type and level of grazing use. Guidelines for grazing management are types of methods and practices determined to be appropriate to ensure the standards can be met or that significant progress can be made toward meeting the standard. Guidelines are tools that help managers and permittees achieve standards. Guidelines are specific to livestock grazing. Guidelines are best management practices such as grazing systems that could be used to achieve rangeland health standards.

Although the process of developing standards and guidelines applies to grazing administration, present rangeland health is the result of the interaction of many factors in addition to grazing livestock. Other contributing factors may include, but are not limited to, past land uses, land use restrictions, recreation, wildlife, rights-of-way, wild horses and burros, mining, fire, weather, and insects and disease (Arizona Standards for Rangeland Health and Guidelines for Grazing Administration, 1997).

With the commitment of BLM to ecosystem and interdisciplinary resource management, the standards for rangeland health as developed in this current process will be incorporated into management goals and objectives. The standards and guidelines for rangeland health for grazing administration, however, are not the only considerations in resolving resource issues (Arizona Standards for Rangeland Health and Guidelines for Grazing Administration, 1997).
2.0 General Description of Evaluation Area

The Three Brothers Ranch is located in Cochise County, Arizona and is approximately 4 miles west of Tombstone, Arizona and approximately 20 miles northeast of Sierra Vista. The current livestock operation on controlled lands is 68 cattle year-long at 24% public land use (2,691 acres of public land, 5,403 acres state land, and 160 acres of private land). All of the ranch’s watersheds drain into the San Pedro River. There is no free-flowing surface water on the ranch.

Elevation on the Three Brothers Allotment is approximately 4,541 ft. the Three Brothers Hills are located on the southern portion of the allotment. The allotment is made up mostly of limy upland, granitic upland and limestone hills. Map 1 depicts the location and land status of the Three Brothers Allotment. GPS coordinates- Nad 27: 12R0578156 x 3509745.

3.0 Grazing Use

Grazing use on the Three Brothers allotment is in accordance with the terms and conditions of the permit.
A summary of type and level of grazing management is provided in the table below.

Table 1. Grazing use on the Three Brothers allotment #5232.

<table>
<thead>
<tr>
<th>Active Grazing Use</th>
<th>68 cattle</th>
</tr>
</thead>
<tbody>
<tr>
<td>Season of Use</td>
<td>Yearlong</td>
</tr>
<tr>
<td>Kind and Class of Livestock</td>
<td>Cattle</td>
</tr>
<tr>
<td>Percent Public Land</td>
<td>24%</td>
</tr>
</tbody>
</table>

Mandatory terms and conditions:

5232 Three Brothers 68 cows 3/1-2/28 24% PL 196 AUMs

Other terms and conditions:
You are required to submit a report of the actual grazing use made on this allotment for the previous grazing period, March 1 to February 28. Failure to submit such a report by March 15 of this year may result in suspension or cancellation of your grazing permit.
Grazing use is authorized in accordance with the Allotment Management Plan (AMP).

4.0 Evaluation Area Profile

4.1 Land Status
The Three Brothers allotment is identified as an I (Improve) category allotment.

Improve (I) Category criteria
- Present range condition is unsatisfactory and/or needs improvement.
- Allotments have moderate to high resource production potential and are producing at low to moderate levels.
- Serious resource-use conflict and/or controversy exists.
- Opportunities exist for positive economic return from public investments.
- Present management appears unsatisfactory and/or needs improvement.

Allotments in the “I” category require either a change in management practices to improve conditions and achieve a relatively high resource potential or mitigation of serious resource conflicts.

The management objectives for “I” allotments are to improve current resource conditions or resolve conflicts. Therefore, “I” allotments will have first priority for range improvement funding, AMP development, monitoring and use supervision.

Range condition, trend and precipitation will be monitored on all “I” allotments. Utilization and actual livestock use will be monitored on the allotments that receive livestock grazing use. Other studies to monitor water and wildlife habitat will also be conducted.

Refer to Table 2 for land acreage in the Three Brothers allotment.

Table 2. Land status and acreage of the Three Brothers allotment.

<table>
<thead>
<tr>
<th>Type of Acreage</th>
<th>Acres</th>
<th>Sections</th>
</tr>
</thead>
<tbody>
<tr>
<td>Public Land</td>
<td>2691</td>
<td>4.2</td>
</tr>
<tr>
<td>Private Controlled</td>
<td>160</td>
<td>0.25</td>
</tr>
<tr>
<td>State Controlled</td>
<td>5403</td>
<td>8.4</td>
</tr>
<tr>
<td>Total Controlled Lands</td>
<td>8254</td>
<td>12.9</td>
</tr>
</tbody>
</table>

4.2 Soils and Ecological Sites

The Natural Resource Conservation Service characterizes land resource regions by particular patterns of soils, climate, water resources and land uses. These large regions are then grouped into Major Land Resource Areas (MLRAs). The majority of the Three Brothers Allotment is MLRA 41-3 (12-16 inches of precipitation/ per year). MLRAs are then broken down further into ecological sites, which are associated units of soil and vegetation with quantifiable characteristics. The ecological sites occurring on the Three Brothers allotment are: Limy Upland 41-3, Loamy Swale 41-3, Saline Bottom 41-3, Loamy Upland 41-3, Granitic Upland 41-3 and Granitic Hills 41-3.

4.3 Wildlife Resources/Special Status Species
Wildlife:
The allotment is adjacent to the San Pedro Riparian National Conservation Area, and provides important habitat to many wildlife species due to the allotment’s proximity to the San Pedro River. Both mule deer and Coues’ white-tailed deer may occur at least seasonally on the allotment. Chihuahuan desert scrub provides habitat for javelina, as well as many reptile and amphibian species. Avian species which utilize the area include Gambel’s quail and mourning dove, as well as neotropical migrants such as loggerhead shrike and various sparrow species.

Threatened and Endangered:
A fence separates the San Pedro Riparian NCA from the allotment and the occurrence of threatened, endangered, or candidate species have not been documented on the allotment. The historic ranges of the federally endangered jaguar (*Panthera onca*) and ocelot (*Leopardus pardalis*) may have occurred on the allotment. Gila Monster (*Heloderma suspectum*), a listed sensitive species by Arizona Game and Fish Department, is known to occur in the area. Roosting and/or foraging habitat for the federally endangered lesser long-nosed bat (*Leptonycteris curasoea verbabuena*) may occur on or near the allotment. Suitable habitat for the federally threatened Chiricahua leopard frog (*Lithobates chiricahuensis*), spikedace (*Meda fulgida*), loach minnow (*Tiaroga cobitis*), desert pupfish (*Cyprinodon macularius*), Gila chub (*Gila intermedia*), and Gila topminnow (*Poeciliopsis occidentalis occidentalis*) historically existed on the San Pedro River, but these species have not been documented on the river for decades. The federally endangered southwestern willow flycatcher (*Empidonas traillii extimus*) and candidate species yellow-billed cuckoo (*Coccyzus americanus*) use the nearby San Pedro River as a migratory corridor and have been documented within a few miles of the allotment. However, suitable habitat for these species does not exist on the allotment. Critical habitat for Huachuca water umbel (*Lilaeopsis schaffneriana recurva*) occurs approximately ½ mile from the allotment on permanent stretches of the San Pedro River. Huachuca water umbel has been documented about 1 mile from the allotment as recently as 2007, but a fence separates this population from the allotment. The U.S. Fish and Wildlife Service Biological Opinion (2-21-96-F-160) addresses the impacts of the Safford and Tucson Field Office’s grazing programs on these listed species.

Special Status Species:
Special status species which may occur on the allotment include burrowing owl and Texas horned lizard, both BLM sensitive species. A bat colony currently roosts in the Boquillas barn approximately ½ mile from the allotment, and bats may use the allotment for foraging habitat.

4.4 Special Management Areas

<table>
<thead>
<tr>
<th>Yes</th>
<th>Name</th>
<th>Date Established</th>
<th>No</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Wild &amp; Scenic Rivers</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>Wilderness</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>Unique Waters</td>
<td></td>
<td>X</td>
</tr>
<tr>
<td></td>
<td>ACECs</td>
<td>X</td>
<td>1989</td>
</tr>
<tr>
<td></td>
<td>Other</td>
<td>X</td>
<td>1989</td>
</tr>
</tbody>
</table>

The Three Brothers Allotment is included in The San Pedro National Conservation Area. In 1989 BLM completed a land management plan for the 47,668 acres or public land along the upper San Pedro River. The San Pedro River Riparian Management Plan and Environmental Impact
Statement (BLM 1989) provides direction for management of the natural and cultural resources of the property. During the preparation of the San Pedro plan, Congress designated these lands and adjacent public lands (54,189 acres) as the San Pedro Riparian National Conservation Area. Management direction for the adjacent lands was not determined in the San Pedro plan, but will be made in the approved Resource Management Plan, consistent with the Legislation and the San Pedro plan. The Management decisions and mitigations of the San Pedro River Riparian Management Plan and Environmental Impact Statement are incorporated into the Safford District Resource Management Plan.

4.5 Recreation Resources

There are no developed recreation facilities in the allotment; however, dispersed recreation does occur. Dispersed recreation primarily involves small and big game hunting, target shooting and off-highway vehicle (OHV) operation. Vehicle access to the allotment is limited. Roads are in stable condition. Overall there is very little sign of recreation use or subsequent impacts. There are no recreation related concerns at this time.

4.6 Visual Resources

Safford RMP designated public lands within the Three Brothers area as Visual Resource Management (VRM) class III. The visual resource objective for this class is to partially retain the existing character of the landscape. The level of activity may attract attention but should not dominate the view of the casual observer. Changes should repeat the basic elements found in the predominant natural features of the characteristic landscape.

4.7 Cultural Resources

Issuance of the permit constitutes a Federal Undertaking under Section 106 of the National Historic Preservation Act (NHPA). The Area of Potential Effect (APE) has been determined to be the public lands within the grazing allotment.

Actions have been taken to identify cultural resources located in the APE, evaluate the eligibility of cultural resources for listing in the National Register of Historic Places (NRHP), determine the effect of the undertaking on eligible cultural resources, and design mitigation measures of alternatives where appropriate. These actions are in compliance with the BLM Cultural Resources Programmatic Agreement, the Arizona BLM – SHPO Protocol, the 1980 Programmatic Memorandum of Agreement between BLM Advisory Council on Historic Preservation, the National Conference of State Historic Preservation Officers, and the BLM 8100 Manual series.

The State Historic Preservation Officer (SHPO), the Advisory Council on Historic Preservation, and Indian tribes having historical ties to Arizona public lands were consulted during the preparations of the Upper Gila/San Simon Grazing Environmental Impact Statement (9/86) and the Safford Resource Management Plan (9/78). Indian tribes were consulted at the beginning of the permit renewal process. There were no areas of Native American concern, Traditional Cultural Properties (TCP), or Sacred Sites identified during consultations.
Allotment case files, AMP files, range project files, Water Source Inventory files, and Cultural Resource files were reviewed to determine areas of livestock congregation and whether these areas have been previously inventoried for cultural resources. Historic properties were not identified in areas of livestock congregation. Therefore, no mitigation is recommended to protect cultural values as a term or condition of the permit.

As required by the Native American Graves Protection and Repatriation Act regulations at 43 CFR 10.4(g), the following should be added to the grazing lease/permit as a term and condition:

If in connection with allotment operations under this authorization, any human remains, funerary objects, sacred objects or objects of cultural patrimony as defined in the Native American Graves Protection and Repatriation Act (P.L. 101-601; 104 Stat. 3048; 25 U.S.C. 3001) are discovered, the permittee shall stop operations in the immediate area of the discovery, protect the remains and objects, and immediately notify the Authorized Officer of the discovery. The permittee shall continue to protect the immediate area of the discovery until notified by the Authorized Officer that operations may resume.

* Properties refer to archaeological sites, Traditional Cultural Properties, and Sacred Sites.

4.8 Noxious Weeds/Invasive Species

No noxious weeds are known to occur on the allotment. However, invasive species such as Lehmann lovegrass (*Eragrostis lehmanniana*), mesquite (*Prosopis velutina*) and acacia (*Acacia spp.*) do occur on the allotment.

4.9 Key Areas/Key Species

Key areas are indicator areas that reflect what is happening on a larger area as a result of on-the-ground management actions. A key area should be a representative sample of a large stratum, such as an ecological site, watershed area, pasture, wildlife habitat area, or herd management area. Key species are generally an important component of a plant community. Key species serve as indicators of change and may or may not be forage species. Refer to the monitoring section of this packet for locations of key areas on the allotment. Key species were identified at each key area. Refer to section 5.0 for monitoring results as related to key species and key areas

4.10 Allotment Objectives

4.10.1 Arizona Standards for Rangeland Health and Guidelines for Grazing Administration

**Standard 1: Upland Sites**

Upland soils exhibit infiltration, permeability, and erosion rates that are appropriate to soil type, climate and landform.

**Standard 2: Riparian- Wetland Sites**

Maintain or improve riparian/wetland areas to facilitate proper functioning condition.
Standard 3: Desired Resource Condition
Maintain or improve productive and diverse upland and riparian-wetland plant communities of native species.

5.0 Management Evaluation

5.1 Precipitation

As of April 2006, the southeastern portion of Arizona has been in a serious drought for 7 to 10 years, dependent upon the locality. Most of the precipitation stations have experienced up to seven years of below average moisture. The last four years produced exceptionally limited amounts of precipitation at many stations. Precipitation data is collected from BLM, National Oceanic and Atmospheric Agency and private rain gauge stations within the BLM Administrative Area. The data presented in Table 3 and Table 4 came from the Western Regional Climate Center rain gauge station which is nearest to the allotment. (Fairbank 1 S station number 022902).

Table 3. Western Regional Climate Center rain gauge data

<table>
<thead>
<tr>
<th>Average Total Precipitation (in.)</th>
<th>Jan</th>
<th>Feb</th>
<th>Mar</th>
<th>Apr</th>
<th>May</th>
<th>Jun</th>
<th>Jul</th>
<th>Aug</th>
<th>Sep</th>
<th>Oct</th>
<th>Nov</th>
<th>Dec</th>
<th>Annual</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>0.30</td>
<td>0.66</td>
<td>0.79</td>
<td>0.41</td>
<td>0.78</td>
<td>2.16</td>
<td>4.67</td>
<td>1.55</td>
<td>1.79</td>
<td>0.4</td>
<td>0.72</td>
<td>14.48</td>
<td></td>
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</table>

Table 4. Western Regional Climate Center rain gauge data.

![Western Regional Climate Center Chart]
5.2 Rangeland Monitoring

<table>
<thead>
<tr>
<th>Method</th>
<th>Yes</th>
<th>Date</th>
<th>No</th>
</tr>
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<tbody>
<tr>
<td>Rangeland Health Assessment</td>
<td>X</td>
<td>12-2-08</td>
<td></td>
</tr>
<tr>
<td>Pace Frequency</td>
<td>X</td>
<td>8-29-07</td>
<td></td>
</tr>
<tr>
<td>Dry Weight Rank</td>
<td>X</td>
<td>8-29-07</td>
<td></td>
</tr>
<tr>
<td>Point Cover</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Line Intercept</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Photos</td>
<td>X</td>
<td>12-2-08</td>
<td></td>
</tr>
<tr>
<td>Utilization</td>
<td></td>
<td></td>
<td>X</td>
</tr>
<tr>
<td>Actual Use</td>
<td>X</td>
<td>12-2-08</td>
<td></td>
</tr>
<tr>
<td>Climate</td>
<td></td>
<td>1971-2000</td>
<td></td>
</tr>
</tbody>
</table>

5.2.1 Actual Use

Actual use data for livestock was determined through Actual Use Reports, Form 4130-5, when available from past billing statements. Refer to Table 5 for actual use from the previous 10-years.

Table 5. Actual use on the Three Brothers allotment.

<table>
<thead>
<tr>
<th></th>
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<th></th>
<th></th>
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</tr>
</thead>
<tbody>
<tr>
<td>Three Brothers</td>
<td>196</td>
<td>196</td>
<td>196</td>
<td>192</td>
<td>192</td>
<td>196</td>
<td>196</td>
<td>196</td>
<td>196</td>
<td>196</td>
<td>196</td>
</tr>
</tbody>
</table>

5.2.2 Upland Health Assessment

Upland health assessments were completed at one key area on the Three Brothers Allotment in December 2, 2008. A key area was used for the Upland Health Assessment, as it represents ecological sites over the majority of the allotment. This method involves observing a set of physical and biological attributes at a site to determine upland health. These observed attributes are placed in one of five categories depending on their degree of variance from reference conditions on the site (i.e. None to Slight, Slight to Moderate, Moderate, Moderate to Extreme, and Extreme). These attributes include items such as: litter amount, annual production, compaction layer, plant pedestals, flow patterns, soil and litter movement by wind or water, and presence of rills or active gullies. A final upland health determination is made by summing all of the attributes. Refer to Table 6 for a summary of the assessments on the Three Brothers allotment. Methods for the upland health assessments are described in “Interpreting Indicators of Rangeland Health, Technical Reference 1734-6, 2000”.

Table 6. Summary of upland health assessments at each key area.

| Rangeland Health Attribute | Departure From Ecological Site Description |
5.2.3 Ground Cover

Ground cover data was collected on the Three Brothers allotment. These data were collected in accordance with procedures for point cover data outlined in “Sampling Vegetation Attributes, Interagency Technical Reference, 1996”. Ground cover was made up of 61% bare ground, 13% gravel, 21% litter, and 5% live vegetation. Refer to Appendix 1 for ground cover data.

5.2.4 Frequency/Trend

Frequency and trend data was collected in accordance with procedures outlined in “Sampling Vegetation Attributes, Interagency Technical Reference, 1996”. Frequency data for grass and forbs were collected as basal hits. Frequency data for shrubs were collected as canopy cover. Low woolygrass \((Dasyochloa\, pulchella)\), bush muhly \((Muhlenbergia\, porter)\) and Lehmann lovegrass \((Eragrostis\, lehmanniana)\) make up the grasses with the highest frequency. Zinnia Dwarf desert peony \((Acourtia\, nana)\) is the highest frequency perennial forb. Creosote \((Larrea\, tridentate)\) whitethorn \((Acacia\, constricta)\), and tarbush \((Flourensia\, cernua)\) have the highest frequency of trees and shrubs. Refer to Appendix 1 for frequency data.

5.2.5 Composition

Species composition data were collected using the Dry Weight Rank (DWR) methodology at each key area. DWR data were collected in accordance with procedures outlined in “Sampling Vegetation Attributes, Interagency Technical Reference, 1996”. Low woolygrass grass makes up the highest percent composition of grasses. Zinnia had the highest percent composition of forbs. Whitethorn and creosote have the highest percent composition of trees and shrubs. Refer to Appendix 1 for composition data.

6.0 Conclusions

Based on the analyses and supporting documentation referenced herein, resource conditions on the Three Brothers Allotment are as follows:

**Standard 1. Upland Sites:** There are no concerns about soils that should be considered before permit issuance. Upland soils exhibit infiltration, permeability, and erosion rates typical for this soil type, climate and land form. The Upland Health Assessment data shows soil/site stability, and hydrologic functions meet expectations when compared to reference area conditions. The biotic integrity function is slightly impaired due to higher than expected numbers of creosote and some invasion of the exotic Lehmann lovegrass. Therefore, standard 1 is being met for this allotment.

**Standard 2. Riparian-Wetland Sites:** Standard 2 is not applicable to the Three Brothers...
allotment, as there are no riparian areas on the allotment.

**Standard 3. Desired Resource Conditions:** Desired Resource Condition - There are no vegetative resource concerns that should be considered before permit issuance. The Upland Health Assessment indicates the soil and site stability, hydrologic, and biotic integrity functions are meeting expectations for the site. Therefore, Standard 3 is being met for this allotment.

### 7.0 Recommendations

Issue 10-year grazing permit with the following terms and conditions:

Mandatory terms and conditions:

<table>
<thead>
<tr>
<th>5232 Three Brothers</th>
<th>68 cows</th>
<th>3/1-2/28</th>
<th>24% PL</th>
<th>196 AUMs</th>
</tr>
</thead>
</table>

Other terms and conditions:
Lessee is required to submit a report of the actual grazing use made on this allotment for the previous grazing period, March 1 to February 28. Failure to submit such a report by March 15 of this year may result in suspension or cancellation of the grazing permit.

If in connection with allotment operations under this authorization, any human remains, funerary objects, sacred objects or objects of cultural patrimony as defined in the Native American Graves Protection and Repatriation Act (P.L. 101-601; 104 Stat. 3048; 25 U.S.C. 3001) are discovered, the permittee shall stop operations in the immediate area of the discovery, protect the remains and objects, and immediately notify the Authorized Officer of the discovery. The permittee shall continue to protect the immediate area of the discovery until notified by the Authorized Officer that operations may resume.
8.0 Consultation

Prepared By/Staff Review:  

<table>
<thead>
<tr>
<th>Name</th>
<th>Signature</th>
</tr>
</thead>
<tbody>
<tr>
<td>Eric Baker, Rangeland Management Specialist</td>
<td></td>
</tr>
<tr>
<td>Marcia Radke, Wildlife Biologist</td>
<td></td>
</tr>
<tr>
<td>Nathan Dieterich, Hydrologist</td>
<td></td>
</tr>
<tr>
<td>Heather Swanson, Natural Resource Specialist</td>
<td></td>
</tr>
</tbody>
</table>

9.0 Selected Management Action

Implement the grazing and other management actions identified in 7.0 Recommendations.

Authorized Officer Concurrence:

___ I concur with the conclusions and recommendations as written.

___ I do not concur.

___ I concur, but with the following modifications.

_________________________  ____________________
Cindy Alvarez                Date
Assistant Field Manager
Appendix 1

Dry Weight Rank Data Calculations

Allotment: Three Brothers  
Date: 8/29/07  
Observers:  
GPS: 12 R 0580496  
3510182  
Pasture:  
Key Area: TB-1  
MLRU:  
Exposure:  
Elevation:  

Species  
Perennial Grasses  
Lehmann Lovegrass 12 10 5 10 90 8%  
Bush Muhly 11 6 6 4 58 5%  
Fluffgrass 76 42 45 24 408 36%  
Three Awn 4 1 3 10 1%  
Bristlegrass 3 2 1 16 1%  

Forbs  
Desert Holly 23 4 6 13 53 5%  
Silverleaf Nightshade 2 2 4 2 4%  
Zinnia 31 8 15 13 99 9%  
DYC 2 2 4 2 2%  
Croton 5 1 1 5 1%  
Unknown Forb 2 1 1 3 1%  

Trees and Shrubs  
Creosote 3 26 9 16 17 112 10%  
Whitethorn 5 33 18 8 20 162 14%  
Tarbush 6 14 9 8 8 87 8%  
Christmas Cactus 2 1 1 1 2 9 1%  
Snakeweed 2 1 1 2 13 1%  

Annual Forbs 18  
Annual Grasses 16  

Ground Cover  
Bare Ground 73 61%  
Gravel (1/4"-3") 16 13%  
Rock (>3") 0%  
Litter 25 21%  
Live Vegetation 6 5%  

% Cover 120