



File Code: 1950-3/2210

Date: August 26, 2011

Dear Project Reviewer:

This letter describes the Wallowa-Whitman National Forest's proposal to authorize livestock grazing within the area which will be further referred to as LIRA (Lower Imnaha Rangeland Analysis). This area includes four livestock grazing allotments, Cow Creek, Lone Pine, Rhodes Creek and Toomey all of which are located in Hells Canyon NRA (National Recreation Area) in the lower part of the Imnaha River Corridor. The Forest Service also invites you to participate in the development of this analysis by responding to this letter, by reviewing our draft Environmental Assessment document, and by talking with our staff as the analysis progresses.

**Location:**

The LIRA area is located approximately 35 miles northeast of the town of Enterprise, Oregon and encompasses 45,625 acres. The Rhodes Creek Allotment is located the furthest south and west; starting just northeast of the Buckhorn Overlook, and ending just north of the Haas Horse Troughs. The Lone Pine Allotment is located the furthest north and east, ending half way up Deep Creek to the east and confined to the Snake River to the north. The LIRA area encompasses all or part of Township 4 North, Range 48 and 49 East; Township 3 North, Range 48, 49 and 50 East; Township 2 North, Range 48 and 49 East; and Township 1 North, Range 49 East, Willamette Meridian. Please refer to the map attached to this letter for a view of the project area.

**Purpose and Need:**

The purpose of this project is to implement the direction of the Wallowa-Whitman Forest Plan<sup>1</sup>, HCNRA CMP (Comprehensive Management Plan)<sup>2</sup>, and the Acts of Congress to provide grazing on National Forest System lands. This analysis is being prepared to determine if the Forest Service should continue to authorize livestock grazing in the four allotments identified of this project. The needs associated with this project are:

- The need for compliance with the Rescission Act of 1995 (Public Law 104-19, Section 504), that requires the Forest Service to establish and adhere to a schedule for completion of National Environmental Policy Act (NEPA) analyses and decisions on all grazing allotments.
- Where consistent with other multiple use goals and objectives, there is Congressional intent to allow grazing on suitable lands (*Multiple Use Sustained Yield Act of 1960, Wilderness Act of 1964, Forest and Rangeland Renewable Resource Act of 1974, Federal Land Policy and Management Act 1976, National Forest Management Act of 1967, Section 7 of the HCNRA Act of 1975, Oregon Wilderness Act of 1984, Omnibus Oregon Wild and Scenic Rivers Act of 1988, and Forest Service Manual 2202.1*)

<sup>1</sup> USDA Forest Service. (1990). Land and Resources Management Plan for the Wallowa-Whitman National Forest. Wallowa-Whitman National Forest, Baker City, Oregon.

<sup>2</sup> USDA Forest Service. (2003). Hells Canyon National Recreation Area Comprehensive Management Plan. Wallowa-Whitman National Forest. Baker City, Oregon.



- The need to continue contributing to the economic and social well being of communities that depend on range resources for their livelihood by providing opportunities for economic diversity and promoting stability (FSM 2202.14).
- The need to complete Allotment Management Plans (AMP's) that are consistent with a NOAA letter of concurrence for grazing and associated activities affecting spring and fall Chinook salmon and Snake River Basin steelhead; and U.S. Fish and +Wildlife Service Biological Opinion for grazing and associated activities affecting bull trout.

The final assessment of the LIRA project area will ensure that the project area continues to move toward conditions identified within the CMP and the Forest Plan, as amended (1990).

### **Composition of Analysis:**

The following assessments or analyses will be completed for the LIRA project area:

1. Soil and hydrologic function in both the uplands and riparian areas
2. Rangeland assessments including
  - a. Interpreting Indicators of Rangeland Health<sup>3</sup>
  - b. Parker 3-Step data<sup>4</sup>
  - c. Cover/Frequency plots<sup>5</sup>
  - d. Proper Functioning Condition<sup>6</sup>
  - e. Soil Stability Tests<sup>7</sup>
3. Botany surveys
  - a. Threatened, Sensitive and Endangered species
  - b. Rare and Endemic plant species
  - c. Rare combinations of outstanding and diverse ecosystems
  - d. Noxious and invasive weeds
4. Wildlife surveys
  - a. Threatened, Sensitive and Endangered species
5. Fisheries habitat and effects on fisheries
  - a. Threatened, Sensitive and Endangered species
  - b. Designated Critical Habitat for listed species
6. Heritage sites
7. Inventories
  - a. Water developments
  - b. Fencelines
8. Recreation Resource inventories

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<sup>3</sup> Pellant, M., P. Shaver, D.A. Pyke, and J.E. Herrick. 2005. Interpreting Indicators of Rangeland Health, version 4. Technical Reference 1734-6. U.S. Department of the Interior, Bureau of Land Management, National Science and Technology Center, Denver, CO.

<sup>4</sup> USDA Forest Service. 1984. Range Analysis and Management Handbook. Region 6 FSH 7/84 Amendment 8.

<sup>5</sup> USDA Forest Service. 2005. Methodology Technical Guide Cover-Frequency Transect Protocol.

<sup>6</sup> USDI BLM. 1998. A User Guide to Assessing Proper Functioning Condition and the Supporting Science for Lotic Areas. Technical Reference 1737-15. U.S. Department of Interior Bureau of Land Management National Applied Resources Science Center, Denver, CO.

<sup>7</sup> Herrick, J.E., J.W. Van Zee, K.M. Havstad, L.M. Burkett and W.G. Whitford. 2004. Monitoring for Grassland, Shrubland, and Savanna Ecosystems. USDA-ARS Jornada Experimental Range, Las Cruces, NM.

### **Forage Allocation and Allotment Information:**

The conditions within the LIRA project area are evaluated based on the objectives, standards and guidelines as stated on pages C-44 through C-50 of Appendix C of the Hells Canyon CMP. The proposal for the LIRA project area would authorize grazing, management, and proposed actions as described below.

Lone Pine - A total of 1,640 head months of livestock and 33 head months of horse/mule grazing would be authorized on the 11,084-acre allotment between the dates of December 1 and May 31. The Lone Pine Allotment consists of eight pastures with approximately 1.2 percent of the allotment privately owned. Since 2009, this allotment has not been grazed by livestock. Prior to 2009, management of this allotment consisted of annual winter and spring grazing. *Silene Spaldingii* (Spaldings catchfly) and listed fish or designated critical habitat for listed fish species are known to exist either within or adjacent to this allotment. This allotment has not previously been addressed by an Allotment Management Plan. Assessment and inventories of the Rangeland condition revealed that past management practices including homesteading, farming, sheep, horse, and cattle grazing coupled with the introduction of annual invasive species have altered rangeland condition. Current conditions conclude that the allotment is in a satisfactory condition with limited areas of rangeland health concern.

The overall health of the rangeland on the Lone Pine Allotment appears to be in a satisfactory condition, with one preliminary resource concern; the continual spread of invasive annuals. Discussions will continue between the Forest Service, permittee, and interested publics to address this and any other concerns. There are not any preliminary concerns for the listed fish species and designated critical habitat of listed fish species within or adjacent to this allotment.

Cow Creek – A total of 1,255 head months of livestock grazing would be authorized on the 5,867-acre allotment between the dates of November 1 and May 15. The Cow Creek Allotment consists of ten pastures, and with the purchase of the TNC land, 100 percent of the allotment is projected to be owned by the Forest Service by the end of the 2012 fiscal year. Current management of this allotment consists of annual fall, winter and spring grazing. There are not any known Threatened, Endangered, or Sensitive plant or wildlife species located within the allotment. There are listed fish and designated critical habitat for listed fish species within this allotment. This allotment has not previously been addressed by an Allotment Management Plan. Assessment and inventories of the rangeland condition revealed that past management practices including homesteading, farming, sheep, horse, and cattle grazing coupled with the introduction of annual invasive species have altered rangeland condition. Records of changes in management, permittee accounts, and limited past monitoring data relate that management over the last ten years is improving the overall rangeland health.

Although the health of the rangeland on this allotment is improving, there are two preliminary resource concerns on the Cow Creek Allotment; the continual spread of invasive annuals and sloughing of soils on the steeper north facing slopes. Potential options to address concerns include:

- Removing down fences
- Decreasing the current number of pastures, and grazing in a shorter duration grazing system within each of the pastures.

Discussions will continue between the Forest Service, permittee, and interested publics to address these and any other concerns. There are not any preliminary concerns for the listed fish species and designated critical habitat of listed fish species within or adjacent to this allotment.

Rhodes Creek - A total of 4,495 head months of livestock and 97 head months of horse/mule grazing would be authorized on the 24,465-acre allotment between the dates of November 1 and May 15. The Rhodes Creek Allotment consists of 16 pastures, with approximately 16 percent of the allotment privately owned. Current management of this allotment consists of annual fall, winter and spring grazing. *Silene Spaldingii* (Spaldings catchfly) and listed fish or designated critical habitat for listed fish species are known to exist either within or adjacent to this allotment. This allotment has not previously been addressed by an Allotment Management Plan. Assessment and inventories of the Rangeland condition reveal that past management practices including homesteading, farming, sheep, horse, and cattle grazing coupled with the introduction of annual invasive species has altered rangeland condition. Records of changes in management, permittee accounts, and limited past monitoring data relate that management over the last ten years is improving the overall rangeland health.

Although the health of the rangeland on this allotment is improving, there are two resource concerns on the Rhodes Creek Allotment; the continual spread of invasive annuals and sloughing of soils on the steeper north facing slopes. Potential options to address concerns include:

- Rest or deferred rotation in some of the primarily north facing steep sloped pastures
- Removing down fences, grazing in a shorter duration grazing system within each of the pastures
- Creating one additional watering site for the livestock.

Discussions will continue between the Forest Service, permittee, and interested publics to address these and any other concerns. There are not any preliminary concerns for the listed fish species and designated critical habitat of listed fish species within or adjacent to this allotment.

Toomey - A total of 1,000 head months of livestock grazing would be authorized on the 4,209-acre allotment between the dates of November 1 and May 15. The Toomey Allotment consists of nine pastures, and with the purchase of the TNC land, approximately 7.5 percent of the allotment will be privately owned by the the end of the 2012 fiscal year. Current management of this allotment consists of annual fall, winter and spring grazing. *Silene Spaldingii* (Spalding's catchfly) exists in several locations within this allotment. There are not any listed fish species or habitat for listed fish species within this allotment. This allotment has not previously been addressed by an Allotment Management Plan. Assessment and inventories of the Rangeland condition revealed that past management practices including homesteading, farming, sheep, horse, and cattle grazing coupled with the introduction of annual invasive species have altered rangeland condition. Records of changes in management, permittee accounts, and limited past monitoring data relate that management over the last ten years is improving the overall rangeland health.

Although the health of the rangeland on this allotment is improving, there are three resource concerns on the Toomey Allotment; the continual spread of invasive annuals, sloughing of soils on the steeper north facing slopes, and the rangeland condition within some of the Spalding's catchfly sites. Potential options to address concerns include:

- Increasing the current number of pastures and grazing in a shorter duration grazing system within each of the pastures
- Re-developing water to allow for increased distribution of livestock
- Monitoring the condition of the known Spalding's catchfly sites and/or change the rangeland monitoring protocol for these sites, and as a last resort, fence the Spalding's catchfly sites that are currently receiving the most use.

Discussions will continue between the Forest Service, permittee, and interested publics to address these and any other concerns.

**Potential Alternatives:**

In addition to the proposed action, a no grazing alternative will also be analyzed in detail. Other alternatives may be developed to respond to internal concerns or concerns identified by the public as the analysis proceeds.

**Decision to be Made:**

Based upon the interdisciplinary analysis presented in the environmental assessment, the Area Ranger will determine:

- Whether or not to authorize livestock grazing on the identified allotments and if so, under what terms and conditions.
- In an action alternative is selected, that it is consistent with both the Forest Plan (1990) as amended, and the HNCRA CMP (2003).
- Whether the selected action would have a significant impact upon the quality of the human environment and, therefore, require development of an Environmental Impact Statement (EIS).
- That there is a reasonable expectation that anticipated funding would be adequate to complete any required monitoring and evaluation identified in the selected alternative.

**Timeline for the Analysis:**

The following table outlines the estimated proposed timeline set for the completion of the Lower Innaha Rangeland Analysis.

<b>Activity</b>	<b>Timeline</b>
Begin Scoping	August 2011
Identify Issues and Alternatives	November 2011
EA Available for Public Comment	April 2012
EA and Decision Notice	October 2012
Begin Implementation	February 2013

**Public Involvement:**

Wallowa-Whitman NF staff will host a field trip to the LIRA project area during the fall of 2011. This trip will be conducted to familiarize interested members of the public with the analysis area, and to answer any resulting questions. The Forest Service encourages those of you who are interested in this project to become involved in the planning process by participating in the field trip, and/or providing us with your comments on this proposal. Please submit written comments to:

Wallowa-Whitman National Forest  
Wallowa Mountains Office  
Attention: Kelly Birkmaier  
Lower Innaha Rangeland Analysis  
201 East 2<sup>nd</sup> Street  
Post Office Box 905  
Joseph, Oregon 97846

Comments may also be emailed to: [kbirkmaier@fs.fed.us](mailto:kbirkmaier@fs.fed.us). To submit comments by telephone, or for more information about the project, please contact Kelly Birkmaier at (541) 263-0893. Please submit your comments by September 25, 2011. As with all Forest Service proposals, comments provided, and the name and address of the person providing the comments will become a matter of public record. Thank you for reviewing this proposal, and participating in this analysis.

Sincerely,

A handwritten signature in blue ink that reads "Mary DeAgüero". The signature is written in a cursive style with a large initial "M".

Mary DeAgüero  
Area Ranger  
Hell Canyon National Recreation Area

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