



# United States Department of the Interior



BUREAU OF LAND MANAGEMENT  
Lakeview Resource Area  
1301 South G Street, Lakeview, OR 97630  
[www.blm.gov/lakeview](http://www.blm.gov/lakeview)

APR 08 2013

In Reply Refer To:  
4120 (ORL050)

Dear Interested Party:

As a party who commented on the Horseshoe Pasture Riparian Improvement and Livestock Grazing Management Strategy Environmental Assessment (EA) (DOI-BLM-OR-L050-2009-0040-EA), I am writing to notify you that the Lakeview Resource Area, Bureau of Land Management (BLM) is issuing an errata to correct two minor factual errors that were discovered in that document following its publication in July 2010.

Specifically, during the BLM's consideration of, and response to, public comments on the 2009 EA, my staff discovered the EA contained several erroneous statements that the Horseshoe Meadow area was rated as "functioning at risk," which is one of several possible ratings that may be assigned upon completing a riparian Proper Functioning Condition (PFC) assessment carried out in accordance with the Lentic PFC methodology (see BLM Technical Reports 1737-11 and 1737-16). Based on a thorough search of the project records and lentic PFC assessment files at the BLM Lakeview District office, I have determined that no such formal lentic PFC assessment exists or has ever been prepared by the BLM for the Horseshoe Meadow area. As an extra measure of caution prior to issuing this notice, the BLM also talked to several current and former ID team members who assisted in preparing the EA, all of whom confirmed my understanding that no lentic PFC assessment was ever completed for this area.

The Juniper Mountain Rangeland Health Assessment (BLM 2004) notes there was a 60-acre area in the allotment that was described as "functional at risk", but this referred specifically to the Hogback stockpond and playa area, located over 12 miles to the southwest of the Horseshoe Meadow, where a formal lentic PFC assessment (following the lentic PFC assessment methodology) was completed by BLM staff in July 1997 (BLM 1997b).

While the Rangeland Health Assessment did disclose that an Interdisciplinary (ID) team determined that the 50-acre Horseshoe Meadow was not meeting Oregon/Washington Rangeland Health Standard 2, which is related to riparian/wetland area function, the ID team made this determination under the Rangeland Health Assessment methodology (as described in BLM 1997a; 2001), which is not the same evaluation procedure as completing a lentic PFC assessment. In the Rangeland Health Assessment, the BLM did not make a finding that the Horseshoe Meadow area was "functioning at risk." In fact, the Hogback Playa is the only area in the entire allotment that the BLM documented as "functioning at risk" via completion of a lentic PFC assessment (see BLM 1997b and 2004, page 5, paragraphs 2 and 3).

It seems most likely that ID team specialists confused the finding related to the Hogback stockpond and playa area with that of the Horseshoe Meadow during preparation of earlier versions of the EA. The 2010 version of the EA was revised, in part, to remove these erroneous references. However, two such statements were inadvertently overlooked during the revision and need to be corrected EA (see pages 14 and 21).

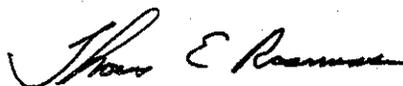
Attached you will find two errata sheets that correct pages 14 and 21 of the 2010 EA in accordance with the facts set out above. The references to "functioning at risk" have been removed from Chapter 3, paragraph 1 of the Riparian Vegetation section (page 14) and Chapter 4, paragraph 1 of the Hydrology and Water Quality section (page 21). The incorrect text has been struck-through on the attached errata sheets. You should replace these pages in your copy of the EA with the corrected sheets.

The BLM does not believe these minor corrections result in a need to change the Finding of No Significant Impact (FONSI), warrant further supplementation of the National Environmental Policy Act (NEPA) analysis, or create a need to issue a new decision because:

- a) At the time the 2010 EA was issued, the BLM's analysis was predicated on the fact that no formal PFC assessment had been conducted in the Horseshoe Meadow. These errata sheets simply correct a minor factual error in the EA to make it accurate and consistent with the assumption that underlies the analysis contained in the EA.
- b) Since no PFC assessment has been performed which found that any fish or aquatic habitat within the project area is "functioning at risk," any management direction in the Lakeview Resource Management Plan (RMP) (RMP; BLM 2003b) calling for the removal of livestock in the event of such a finding (see page 43) is not applicable. This is consistent with what the BLM knew at the time of publishing the 2010 EA and the issuance of the proposed grazing decision, as well.
- c) The management actions described in the existing decision are consistent with the federal rangeland health regulations and applicable direction issued under those regulations, and is also consistent with the management direction in the Lakeview RMP (BLM 2003b; see pages 31, 39-40, and 52-53).

This notice is being provided to all who commented on the EA. If you have questions concerning these corrections, please contact myself or Paul Whitman at (541) 947-2177. If you wish to comment on these corrections, you must submit your comments in writing to me at the BLM, Lakeview District Office, 1301 South G Street, Lakeview, Oregon 97630, and they must be received by me no later than April 23, 2013. This is not a formal comment period under NEPA because this notice of errata is not a separate NEPA document and the BLM is not reopening or otherwise changing its final decision.

Sincerely,



Thomas E. Rasmussen  
Field Manager

Enclosures

## References

- BLM. 1997a. Recommended Versions of Standards and Guidelines for Rangeland Health and Guidelines for Rangeland Health and Guidelines for Livestock Grazing Management. USDI, BLM, Oregon/Washington State Office, Portland, OR. 63 p.
- BLM. 1997b. Standard Lentic (PFC) Checklist. Hogback Road Stockpond and Playa. USDI, BLM, Lakeview Resource Area, Lakeview District, Lakeview, OR. 5 p.
- BLM. 1998. Riparian Area Management. Process for Assessing Proper Functioning Condition for Lentic Riparian-Wetland Areas. TR 1737-11, revised 1998. USDI, BLM, Service Center, Denver, CO. 45 p.
- BLM. 2001. H-4180-1 – Rangeland Health Standards. USDI, BLM, Washington Office, Washington DC. 51 p.
- BLM. 2003a. Riparian Area Management. A User Guide to Assessing Proper Functioning Condition and the Supporting Science for Lentic Areas. TR 1737-16, revised 2003. USDI, BLM, Service Center, Denver, CO. 120 p.
- BLM. 2003b. Lakeview Resource Management Plan/Record of Decision. USDI, BLM, Lakeview Resource Area, Lakeview District, Lakeview, OR. 2 volumes.
- BLM. 2004. Rangeland Health Assessment for the Juniper Mountain Allotment (#0515). USDI, BLM, Lakeview District, Lakeview, OR. 13 p.

## VEGETATION

### Riparian Vegetation

Horseshoe Meadow is located on the west side of Juniper Mountain and contains the most extensive wet meadow area in the allotment (about 50 acres). The meadow area is directly associated with Horseshoe Spring, which has been impacted by past water developments. The associated drainage channel has had several reservoir/pits constructed within it to hold water for livestock use (Map 2). The RHA (BLM 2004c) determined that the Horseshoe Meadow ~~was functioning at risk~~, was not meeting standard 2 (Riparian/Wetland Watershed Function), and that livestock was a causal factor.

In 2004, some riparian vegetation was noted around the spring area, intermixed with upland vegetation (BLM 2004c). Photos 1 and 2 show the riparian meadow vegetation lacked vigor and had weakened root systems in June of 2004. Photos 5 and 6 (2005) and 14 and 15 (2009) show that Kentucky bluegrass and yarrow are abundant downstream of the immediate spring area. Kentucky bluegrass increases rapidly on overgrazed pastures and ranges, and its presence is usually an indication of poor grazing management in the past (Uchytel 1993). Dominance of Kentucky bluegrass indicates prior disturbance such as heavy grazing or lowered water tables (Kovalchik 1987). Once established, Kentucky bluegrass is considered stable (Hansen *et al.* 1988) although rest can restore vigor and composition on at least some sites (Kovalchik 1987). The BLM does not have data to quantify changes in plant composition over the past six years, although some trend toward desirable, deep rooted native may be occurring with the recent improved livestock control in that time period. Based on photos from 2004-2009, vegetative ground cover does appear to be increasing in the meadow.

Because of its relatively shallow root system, Kentucky bluegrass is generally not as good a soil stabilizer as the native grasses and forbs it replaces. In riparian settings, it is ineffective in stabilizing streambanks. It is often associated with erosion and channel downcutting, especially where excessively grazed (Kovalchik 1987; Hansen *et al.* 1988; Uchytel 1993). Sedges and rushes are also present in the meadow and are thought to be largely responsible for the relative stability of the stream channel in recent years.

There are two existing headcuts in the drainage (see Photo 4). Photo analysis through 2009 indicates that these headcuts appear to have been relatively stable in recent years, but may be at risk for movement should a high-flow event occur, such as an intense summer thunderstorm or a large rain-on-snow event, particularly following a drought period that results in less vigorous plant conditions. Should these headcuts move or expand, they have the potential to lower the water table further and negatively affect existing riparian vegetation. Maintenance and/or improvement of the water table elevation coupled with proper grazing management are paramount to the improvement of riparian vegetation in the Horseshoe Meadow area.

The BLM ID team agrees that properly managed grazing can be allowed in the Horseshoe Meadow in the future, provided adequate rest occurs. The wet meadow area still retains the potential to recover annually and improve in vegetative condition over the long-term, if adequate rest is allowed and riparian plant regrowth can occur (see field notes from October 2006 site visit). Further, the monitoring photos taken in the Horseshoe Meadow since 2004 indicate that the riparian vegetation condition has improved somewhat under the interim management strategy.

### Rangeland and Woodland Vegetation

Two sagebrush/grass vegetation types dominate the allotment. Low sagebrush/native grass mixes make up approximately 35% of the allotment. Big sagebrush/native grass mixes make up approximately 45% of the allotment. However, within the big sagebrush/grass vegetation type there is considerable variation, with basin big sagebrush/grass, mountain big sagebrush/grass, and Wyoming big sagebrush/grass present throughout the allotment. The variation in the herbaceous understory indicates that native vegetation communities appear stable (BLM 2004c). A summary of the ESI data (1992-1997) found that 71% of the vegetation in the allotment was in the early to mid-seral stage. Twenty-nine percent was in the late to climax stage. Overall, vegetation in the allotment is in excellent condition. Plant diversity is very high. Shrubs and grasses are in excellent condition (BLM 2004c).

The vegetation along the ridge line of Juniper Mountain consists of Western Juniper (*Juniperus occidentalis*), Idaho fescue (*Festuca idahoensis*), Bluebunch wheatgrass (*Pseudoroegneria spicata*), and low sagebrush (*Artemisia*

Area (LRA). The proposed project area is currently in the Phase I stage of juniper encroachment with approximately 20-40 stems per acre and a fuel loading of approximately 0.80 tons to the acre (see Photo 13). The Rangeland Health Standards Assessment for the Big Juniper Mountain Allotment #515 states that the reduction of western juniper in the spring areas could help restore riparian-wetland function. Upland vegetation and western juniper compete with riparian vegetation for water and nutrients in the soil. Treating the upland vegetation in the riparian-wetland areas may aid in reducing competition for resources needed for recovery of riparian vegetation.

## **CHAPTER IV - ENVIRONMENTAL CONSEQUENCES**

### **INTRODUCTION**

There are no areas identified by the BLM as WSAs, designated wilderness areas, other areas containing wilderness character, or wild and scenic rivers within the allotment (BLM 1980, BLM 1989, BLM 1991, BLM 2003a, BLM 2003b, BLM 2008b). There are no known hazardous waste areas, fish-bearing or perennial stream habitats, areas of religious concern, threatened or endangered species, special status plants, or prime or unique farmlands in the allotment. No significant or disproportionate impacts would occur to low income or minority populations. Neither adverse nor beneficial impact is anticipated to floodplains, air quality, land tenure, or mineral and energy resources from any of the alternatives analyzed in detail.

Potential impacts to hydrology and water quality, soils, range and woodland vegetation, riparian vegetation, cultural plants, noxious weeds, ACEC and RNA values, wildlife habitat, special status animals, livestock grazing management, cultural and historic resources, economic conditions, recreation, and visual quality are discussed in the following section.

### **ALTERNATIVE 1 - NO ACTION**

#### **Hydrology and Water Quality**

Due to the inability to provide periods of rest in the Horseshoe Meadow under this alternative, the degraded hydrologic conditions (ie. "functioning at risk" rating) would continue into the foreseeable future or may even become even more degraded over time. Because livestock currently tend to drift into the meadow area from adjacent pastures, there would be less impact to upland sites in other pastures than at the meadow, but yearly use of the uplands on the west side of Juniper Mountain (with no rest or control) would continue to reduce ground cover on some upland areas adjacent to the meadow area. Decreased ground cover could result in increased erosion and soil loss with an associated loss of water holding capabilities. While extensive migration or expansion of the existing headcuts is not expected, they would not recover or stabilize. Under the right conditions (ie. severe thunderstorm), they could move upstream resulting in a lowered water table adjacent to the drainage.

Water quality in Horseshoe Meadow could continue to be negatively impacted due to the associated poor recovery expectations of the surrounding vegetation, soils, and channel conditions.

No additional impacts to hydrology and/or water quality would be expected in the remainder of the allotment because the existing grazing standards (50% utilization) would remain in place.

#### **Soils**

Under the No Action Alternative, soil erosion within the Horseshoe Meadow would continue and could increase over time. There would be no additional impacts or changes in current impacts to upland soils in the Horseshoe Pasture under this alternative, as no construction or other management changes would occur.

The impacts of continuing a rest-rotation grazing system throughout the remainder of the allotment have already been analyzed in the *Proposed Lakeview RMP/Final EIS* (BLM 2003a). In summary, livestock use would continue to negatively impact area soils due to compaction at waterholes and along trails (pages 4-35 to 4-36). However, a rest-rotation grazing system is designed to reduce these impacts. In addition, the upland vegetation in much of the allotment is in good condition, and would likely remain in a static condition, or experience and upward trend over