



File Code: 1950/2210

Date: May 14, 2008

The Townsend Ranger District of the Helena National Forest is seeking public comment on the proposal to continue authorized livestock use on the **Ray Creek grazing allotment**. This cattle and horse allotment is located in the North Fork of Deep Creek and Holloway Gulch drainages of the Big Belt Mountains, 14 air miles northeast of Townsend in T8N R4E and T7N R4E.

Proposal:

The Ray Creek allotment includes approximately 3900 acres split into a north and a south pasture. The Forest Service currently authorizes two permit holders (permittees) to graze 113 cow/calf pair continuously within a season of July 1 through October 15. The grazing strategy in use is referred to as a deferred rotation system where use is alternated between the two pastures each year. The "early" pasture is the pasture used first until forage utilization levels are reached (approximately August 1). The "late" pasture is the pasture used for the remainder of the grazing season. The pastures will be reversed for early and late use the following year, unless vegetation conditions warrant other action.

Utilization levels prescribed for the allotments determine when livestock must be moved between pastures and/or off National Forest system lands. These levels are currently prescribed by the Helena Forest Plan and outlined in the annual grazing season information given to the permittees. Actual use on the allotment for the last five to seven grazing seasons has been 90-100 cow/calf pair with grazing seasons usually ending in late September. This has been due to persistent drought conditions and limited forage availability.

Most of the usable forage for livestock in this allotment is found within the habitat types of Douglas fir/snowberry or Douglas fire/Idaho fescue. There are a few isolated grass and forb dominated areas totaling about 50 acres (one percent of allotment). In the 1950's, 60's and 70's, many acres of timber were harvested in this area. The most current management plan for this allotment is dated September 26, 1969. At the time of the 1969 plan, active timber harvesting increased useable forage for livestock until the vegetation began to transition back into a shrub/timber dominated habitat. Most of the habitat types are what would be expected in this area with the exception that some of the dominant grasses are introduced species. Kentucky bluegrass and Timothy are the dominant vegetation in many of upland and riparian areas. These grass species increase with disturbance.

Based on vegetation data derived from on the ground inventory and aerial photography, the vegetation in the Ray Creek allotment is characterized as follows:

- 510 acres or 13 percent primary range for livestock grazing. Primary range is considered area cattle will use first because of accessibility to or location near water.
- 240 acres or 6 percent secondary range. Cattle will use these areas if they are herded there or salt is placed there to draw them in. Secondary range is usually hard for livestock



to access. For example, slopes may be steep or there may not be as much preferred forage available.

- 675 acres or 17 percent is transitory primary range. These are old timber harvest units that still have an open tree canopy with ground cover that is primarily grass and forbs. Transitory primary range will eventually become transitory secondary range as tree and shrub density increases.
- 275 acres, or 7 percent is transitory secondary range which means the tree canopy begins to close in and the vegetation shifts from grasses and forbs to shrubs and conifers.
- 2275 acres or 57 percent is unsuitable for livestock grazing.

I am proposing to continue to authorize grazing on the Ray Creek allotment, using an adaptive management strategy. My proposal is to provide for a range of stocking options between 85 cow/calf pair (25 percent less than currently authorized) and recent stocking levels of 100 cow/calf pair (12 percent less than currently authorized). Stocking options would be based on monitoring utilization levels in each pasture. Lower stocking options would allow longer periods of time for grazing, while higher stocking options would allow for shorter grazing periods in each pasture. The overall authorized season of use would remain the same. This proposal would give the permittees greater flexibility in managing their herd size on a yearly basis depending on forage availability, drought and other environmental factors.

Background:

On July 27, 1995, Public Law 104-19 (1995 Rescission Act) was enacted. According to Part (a) of Section 504: "...each forest shall develop and adhere to a schedule for the completion of allotment analyses and decisions as required by the National Environmental Policy Act (NEPA)." Analysis must be completed on all allotments not in compliance with applicable laws, regulations, and Forest plan standards, including NEPA. The analysis that is being performed with the public input I am requesting with this letter, will meet these requirement under the Rescission Act and NEPA.

Public Involvement:

This letter is being mailed to parties who have indicated an interest within the last several years in allotment management plan revisions in the southern Big Belts Mountains of Helena National Forest. This includes parties who have commented on the Baldy, North Fork and Sixmile allotments. Additionally, a news release is being published in the Townsend Star newspaper. Once your comments are received and Forest Service staff analyzes the effects of the proposed action, an official comment period on this project will be opened.

Preliminary Issues:

Preliminary internal review indicates adjusting the stocking rate and/or the timing of grazing through adaptive management will address the issue of primary forage availability and the desired condition of species composition. Monitoring indicates plant communities are generally moving toward desired condition. A riparian exclosure fence was constructed in 2007 along the North Fork of Deep Creek to address streambank use, vegetation and stability. The effectiveness

of that project will be considered in this analysis. Other riparian exclusions may be identified as a need during this analysis.

Preliminary Findings:

My preliminary evaluation of the proposal and known issues indicates that documentation of the analysis in an Environmental Assessment (EA) would be an appropriate level of NEPA. It could then be determined if further documentation (e.g. in an Environmental Impact Statement – EIS) would be required.

In Closing:

Please send written comments specific to this proposed action to:

Dea Nelson
2880 Skyway Drive
Helena, MT 59602

We need your comments by May 28, 2008. For more information on the grazing proposal, please contact Tracy Shilling, Rangeland Management Specialist at (406) 495-3870. I hope you will take the time to comment on this proposal.

Thank you for your interest and participation.

Sincerely,



MICHAEL L. COLE
District Ranger

Ray Creek Allotment Management Plan NEPA Scoping Map

