
Trinity Summit High Country Grazing Analysis
Proposed Action
Lower Trinity Ranger District,
Six Rivers National Forest

Humboldt County
California

The purpose of this proposed action is to inform interested and affected parties of the proposal and to solicit comments to assist with the National Environmental Policy Act (NEPA). Analysis of the proposal is ongoing, and will be documented in an Environmental Impact Statement (EIS). Comments received in response to this solicitation will be used to identify potential environmental issues related to the proposed action and to identify alternatives to the proposed action that meet the purpose of and need for the project. In accordance with 36 CFR 215.5, additional opportunities for public and agency review of the project will occur as the NEPA review progresses.

Where consistent with the goals and objectives of the Six Rivers National Forest Land and Resource Management Plan (LRMP), it is Forest Service policy to make forage from lands suitable for grazing available to qualified livestock operators (FSM 2202.1, FSM 2203.1, 36 CFR 222.2(c), Multiple Use and Sustained Yield Act of 1960, Wilderness Act of 1964, Forest and Rangeland Renewable Resources Planning Act of 1974, Federal Land Management and Policy Act of 1976, National Forest Management Act of 1976). The allotments include lands identified as suitable for grazing in the LRMP and are being managed for grazing. Federal actions such as authorization of grazing and approval of allotment management plans must be analyzed to determine potential environmental consequences (National Environmental Policy Act of 1969, NEPA; Rescission Act of 1995, P.L. 104).

Purpose and Need

The purpose and need for action centers on:

- Maintaining a grazing program under updated Allotment Management Plans for the purposes of contributing to the economic stability of local livestock owners who rely on public land grazing for their livelihood;
- Sustainably managing for healthy rangeland ecosystems that maintain biologic diversity, water quality, soil productivity, quality fish and wildlife habitat;
- Preserving and enhancing the character of culturally significant landscapes.

As directed by the Six Rivers National Forest Land and Resource Management Plan (LRMP), the opportunity to graze must also be consistent with the values and uses of other resources. Range, as well as all other resources within the grazing allotments, should be maintained in satisfactory condition. Because unsatisfactory resource conditions have been identified at key areas within the allotments, action is required that will help restore disturbed areas by using the natural resiliency of the landscape in conjunction with conservative, adaptive management.

Key areas and benchmark sites are designed to serve as examples of average use and conditions throughout each allotment, therefore their status is thought to reflect wider ecosystem processes and the effects of grazing management across the landscape. Current unsatisfactory resource conditions at key areas and benchmark sites represent a need to change or refine grazing

management strategies to achieve resource objectives. Sustaining desired conditions at key areas will help to ensure that desired conditions are sustained elsewhere within the allotments.

Background and Historical Use

The Mill Creek and Trinity Summit allotments are located adjacent to the Eastern boundary of the Hoopa Valley Indian Reservation and include portions of the Trinity Alps Wilderness Area. The primary range types include wet and moist to dry meadows within forest openings as well as riparian areas that support herbaceous forage. However the majority of acreage in both allotments is dominated by coniferous forest. Significant amounts of shrublands exist as well, especially in areas that were affected by the 1999 Megram fire which burned a portion of each allotment at a high or moderate intensity. Although the majority of acreage within the analysis area is heavily forested, there are some excellent grazing lands in the headwaters region for the Horse Linto, Mill and Tish Tang Creeks. This region, known as the Trinity Summit area, is mostly above 5,000 feet in elevation.

The high mountains within the analysis area east of Hoopa Valley were used extensively by the Hupa for spiritual and religious activities. Trails and resting spots along the ridges east of Hoopa Valley were also considered sacred. Religious sites varied but included rock circles, cairns and fire hearths for praying, dancing, singing and the invocation of various incantations. Studies by Six Rivers Cultural Resource Management staff have concluded that the traditional religious practices of the Hupa are still taking place within the high country east of the valley. As a result of these studies, the De-No-To District is on the National Register of Historic Places based on the ethnographical and contemporary values of these sites centered on the Trinity Summit area.

For the most part, historic use within the analysis area has focused on livestock grazing and hunting in the upper reaches of the watersheds in the Trinity Summit region. Also, during the mid-to-late 19th century, camps were often established in this region for miners traveling to the Trinity mines. Due to the steep terrain and higher altitudes of the Trinity Summit region, little historical settlement took place within the analysis area beyond the formation of these camps. Establishment of the Hoopa Valley Indian Reservation in the 1860s led to increased use of the area by the Hupa for seasonal grazing. Many of the permittees using the Trinity Summit area were residents of Hoopa Valley. Grazing of cattle in the analysis areas has been an economic activity for Hupa individuals since the introduction of cattle in the 1860s to the Reservation system; a practice which continues today.

In addition to the Hupa, some ranchers used the Trinity Summit area for the grazing of livestock. Also, the U.S. Army troops stationed in Hoopa Valley grazed their mules in the Trinity Summit area as late as 1897. Some known camps associated with hunting and grazing activities were located at McKay Meadows, Andy's (or Meskets) Camp, Waterdog Lakes, Crogan Hole, Bret Hole, and the Trinity Summit Guard Station.

Current livestock use: In 2008, all pastures in the Mill Creek allotment were stocked with approximately 33 Animal Units (AU)¹ of cattle totaling approximately 79 animal months (AM)². Use in 2008 was slightly higher than that recorded in 2002 and 2004 (76 and 74 AM respectively). Three pastures within the Trinity Summit allotment had non-use in 2008 and one pasture was stocked with approximately 13 AU (10 mature cows and 2 cow calf pairs), or

¹ An Animal Unit is defined by the Six Rivers National Forest Land and Resource Management Plan as one mature cow weighing approximately 1,000 pounds, or its equivalent..

² Animal months is defined as a month's tenure upon rangelands by one animal unit.

approximately 31 AM for the entire allotment (down from approximately 190 AM in 2003). Overall, livestock use has declined from historic stocking levels on both allotments (Table 1).

Table 1. Current Permitted Use

Mill Creek Allotment			
	<i>Average Permitted Use</i>	<i>Maximum Historic Permitted Use</i>	<i>2008 Actual Use</i>
AU	56	142	33
AM	127	235	79
Trinity Summit Allotment			
	<i>Average Permitted Use</i>	<i>Maximum Historic Permitted Use</i>	<i>2008 Actual Use</i>
AU	161	263	13
AM	389	496	31

Existing and Desired Conditions

Desired Conditions: Healthy rangeland ecosystems exhibit biological diversity and provide quality habitat for fish and wildlife. Productivity of herbaceous forage vegetation should be maintained or improved on suitable rangelands while providing forage for livestock. Adequate plant residue must be left for soil protection after each grazing season, and excessive use and trampling should be avoided. Seasonal use of rangelands should provide for a maximum density of desired species and maintain resource values other than range.

In their undisturbed condition, primary suitable rangelands in the Mill Creek and Trinity Summit allotments (such as meadows) were likely dominated by perennial grasses in association with forbs. With perhaps a bias toward forage plants, a partial species list (dated 1902) for northwestern California meadows substantiates the historic preponderance of native perennial grasses. The list covering the Trinity Mountains and inner Coast Range did not indicate the presence of any weed species at that time, but consisted of perennial grasses currently present in meadow complexes of the analysis area: needlegrass (*Achnatherum lemmonii*), wild blue rye (*Elymus glaucus*) and California oatgrass (*Danthonia californica*). Additional species indicative of relatively undisturbed conditions within the analysis area include: alpine timothy (*Phleum alpinum*), fringed gentian (*Gentianopsis simplex*), Klamath gentian (*Gentiana plurisetosa*), a CNPS rare plant, and American brooklime (*Veronica americana*). Riparian vegetation can be dominated by alder, mixed forbs, or a high cover of perennial native sedges and grasses in association with forbs.

Management should strive to mimic the historic landscape in its undisturbed condition. Satisfactory range conditions include: sustained production of herbaceous forage species, a species composition which reflects the dominance of perennial grasses and grass-like species, an adequate amount of plant residue to protect the soil and a minimal amount of bare ground. According to the status of these factors at key areas, rangeland condition and trend scores are determined for their respective pastures (Table 2).

Table 2. Range condition and trend rating system (LRMP IV-120)

Overall Range Condition (Frequency Method)	Range Condition (Parker's Method)	Ecological Trend	Condition
High	Excellent	N/A	Satisfactory
	Good	N/A	Satisfactory
Moderate	Fair	Upward/Static	Satisfactory
	Fair	Downward	Unsatisfactory
Low	Poor	N/A	Unsatisfactory

In the Mill Creek and Trinity Summit allotments, riparian areas should be properly functioning and resilient to natural disturbances. Riparian areas make up a relatively small but productive portion of the landscape that provide important processes and functions such as floodplain and ground water storage, water transport and aquatic habitat. Maintaining adequate riparian vegetation is the most fundamental element in sustaining a properly functioning riparian area. Riparian vegetation and their associated root systems provide the resilience and strength for stream bank stability. Generally speaking, a stream that has upwards of 80 percent of its stream banks stable and vegetated is resilient to natural and grazing-related disturbances. The desired condition for the stream channels not currently meeting bank stability standards is to move towards properly functioning conditions and processes as outlined in the Aquatic Conservations Strategy. Specifically, stream banks should be at least 85% stable, have appropriate width to depth ratios consistent with their stream types and adequate vegetative cover to protect stream banks during high flows.

Existing Condition

Range Condition – vegetation and soils:

Compared to historic conditions, species composition, distribution, abundance, and diversity in most meadow and wetland habitats in the analysis area reflect a shift toward disturbance indicator species. Although indicators of undisturbed conditions persist in rangelands within the analysis area, they no longer persist in the kinds and amounts that would be expected under natural circumstances. These rangelands originally supported an array of species native to the region (such as perennial grass species) and were less weighted toward disturbance indicators such as some species of forbs and sub-shrubs, including sheep sorrel (*Rumex acetosella*), yarrow (*Achillea millefolium*), corn lily (*Veratrum californicum*) and non-native bull thistle (*Cirsium vulgare*).

Conifer and hardwood encroachment is also evident. Alder and incense cedar are the species most often observed occupying areas once dominated by herbaceous meadow plants. Historic conditions would have included meadow settings and periods whereby succession to woody species occurred. However, persistence of woody species and their extent of cover would have been limited, as compared to present day, by periodic fire.

An increase in the amount of bare soil and relatively poor root vigor has also been observed at sites within each allotment. Bare soil is associated with low organic matter levels in the soil surface horizons as well as low plant cover; both of which may also be associated with root vigor. Where bare ground is excessive and plant and litter cover are inadequate, sites display signs of surface erosion such as water flow patterns, erosion pavement, soil pedestals, soil terraces, rills, and gullies.

Riparian and streambank conditions

With the exception of a few critical areas within the Mill and Trinity Summit Allotments, riparian areas are mostly properly functioning. The majority of riparian areas are resilient to disturbances due to boulder and cobble stream banks and a dense mixture of woody and herbaceous riparian vegetation which restricts access. Nevertheless, in the Water Dogs Lake area and in portions of Elmer's Camp, where the stream banks are dominated by more fine-textured soils and herbaceous vegetation, riparian areas have been impacted by grazing activities and are not properly functioning. In the Water Dogs Lake area, many of the stream channel sections within this meadow complex are predominantly unstable with very little vegetative cover at the end of the growing season. As a result, the riparian areas and stream channels within these meadows have eroded and widened significantly resulting in degraded riparian and aquatic habitat.

Trinity Summit High Country Grazing Analysis Proposed Action

Recent range condition and trend monitoring indicate that unsatisfactory range, soil and riparian conditions exist at a number of key areas (Table 3).

Table 3. Range Condition at Key Areas of the Mill Creek and Trinity Summit Allotments

Mill Creek Allotment	<i>Elmer's camp</i>	<i>Red Cap Prairie</i>	<i>Red Cap Hole</i>		
Range Condition	Satisfactory	Unsatisfactory	Satisfactory		
Riparian Condition	Unsatisfactory	N/A*	Satisfactory		
*No riparian					
Trinity Summit Allotment	<i>Trinity Summit</i>	<i>Crogan Hole</i>	<i>Water Dog Lakes</i>	<i>Lower Ferguson Meadows</i>	<i>Patterson and McKay Meadows</i>
Range Condition	Unsatisfactory	Unsatisfactory	Satisfactory	Unsatisfactory	N/A**
Riparian Condition	Satisfactory	Satisfactory	Unsatisfactory	N/A**	Satisfactory

*No riparian site at this key area

** No data available

Proposed Action

The Lower Trinity Ranger District, Six Rivers National Forest, proposes to continue livestock grazing in the Trinity Summit High Country area under the conditions described below and to implement the following boundary or administrative changes to facilitate improved management:

- Combine the Mill Creek and Trinity Summit grazing allotments into a single allotment.
- Add the location known as “Water Dogs North” (located within the Red Cap watershed) to the Water Dogs pasture within the allotment. This 225 acre area has been and would continue to be grazed by livestock. Excluding livestock from the area is impractical given the area is in wilderness and no topographical barriers exist. This would require a non-significant Forest plan amendment.
- Horse Trail and Red Cap pastures would be combined into one pasture.

The Forest also proposes to authorize cattle grazing following an adaptive management process that will meet LRMP goals, objectives, standards and guidelines, and other legal requirements while moving toward desired conditions. The intent of this proposed action is to protect Forest resources while maintaining the flexibility to manage livestock activities within the context of a changing landscape that is subject to variable conditions. When resource concerns are identified, livestock management would adapt in order to safeguard said resources. At the same time, mechanisms would exist that would allow management to take advantage of scenarios that are conducive to livestock. For example, if satisfactory conditions are maintained within the allotment and monitoring indicates that an increase in forage production can support additional livestock then site specific recommendations to increase herd size beyond the estimated maximum stocking rate may be developed on an annual basis within the constraints of existing standards and guidelines.

This proposed action establishes a maximum stocking rate and season of use based on what the landscape can sustain under satisfactory range and riparian conditions. Livestock capacity would be based on primary rangeland types, which principally consist of meadow complexes (see map).

Trinity Summit High Country Grazing Analysis Proposed Action

The proposed action also establishes the stocking rate and season of use based on the current conditions of each pasture. Changes from this starting point would be considered annually and would be based on the condition of range and riparian resources at designated key areas within the pastures.

All rangelands will adhere to the maximum utilization standards described for satisfactory and unsatisfactory conditions in the LRMP (Table 4). Once the allowable use standard is reached, livestock must be moved from the site. Less than the maximum utilization may be grazed depending on site specific resource conditions, the recommendations of the range specialist, and authorized approval. Site specific refinement of allowable use standards may be made in the future if conditions change or if further investigation suggests that an alternate utilization rate is more applicable.

Table 4. Maximum allowable use of range types based on resource conditions

Ecological Type	Grazing System	Season-of-Use	Condition	Utilization
Perennial Grasslands	Continuous	Full season/Spring	Satisfactory	40%
Perennial Grasslands	Continuous	Full season/Spring	Unsatisfactory	20%
Perennial Grasslands	Continuous	Summer	Satisfactory	45%
Perennial Grasslands	Continuous	Summer	Unsatisfactory	25%
Perennial Grasslands	Deferred/Rotation	N/A	Satisfactory	60%
Perennial Grasslands	Deferred/Rotation	N/A	Unsatisfactory	25%
Wet Meadows	N/A	N/A	Satisfactory	60%
Wet Meadows	N/A	N/A	Unsatisfactory	30%
Moist to Dry Meadows	N/A	N/A	Satisfactory	55%
Moist to Dry Meadows	N/A	N/A	Unsatisfactory	25%

Estimated Stocking Rate: The number of allowable animal months (AM) (Table 5) is based on the allocation of available forage production as influenced by proper utilization rates for unsatisfactory or satisfactory resource conditions in a given vegetation type located on suitable rangeland. The number of animal units (AU) is directly affected by the duration of grazing within the proposed season of use as authorized in the annual operating instructions. The number of AU allowed during a season is calculated by dividing the number of AM by the total number of months grazed. For instance, if the authorized number of AM is 100 and the duration of grazing is two months, then the allowable number of AU grazed for that period would be 50. Alternatively, if the duration of grazing is only one month, then 100 AU would be allowed to graze for that month.

Unsatisfactory range or riparian resource conditions within each pasture necessitate the implementation of light grazing use per the direction of the Six Rivers National Forest LRMP. Additional season of use restrictions have been proposed for the Ferguson, Mill Creek Lake and Water Dog pastures in order to facilitate resource recovery due to concerns associated with riparian areas. It has been proposed that these pastures be rested until stream bank stability has improved to greater than or equal to 60% at the key area, at which point grazing within these pastures may continue at light use stocking rates. Once satisfactory resource conditions are met, the pasture would be managed under the maximum stocking rates identified in Table 5. In order to facilitate livestock distribution and management of the Water Dog Lakes area, it is also proposed that the Mill Creek Lake and Water Dog pastures be managed in conjunction with one

another by sharing a common season of use until such time that satisfactory resource conditions are achieved.

Once monitoring indicates that satisfactory resource conditions have been achieved at key areas within a given pasture, livestock numbers would be commensurate with the maximum estimated stocking rates for satisfactory range conditions in a particular pasture. These stocking levels would be maintained as long as conditions remained satisfactory, or until local conditions otherwise changed. Any decision to alter stocking rates or season of use would be dependent upon the results of monitoring.

Season of use: The identified “Season of Use” indicates the appropriate or allowable time of year for livestock grazing to occur. Duration of use within the specified season will be dependent on resource conditions and will be administered by the Range Management Specialist. Some additional time may be permitted under annual operating instructions for moving the livestock on and off the pasture based on range and riparian conditions. The turn-on date and the removal date would be based on plant growth stage (near full-growth), forage availability, conflicts with wildlife, wet soils, and access due to snow. The removal date could be earlier based on range and riparian standards and guidelines.

- **July 16 to September 30**

- Currently, Horse Trail/Red Cap Hole, Crogan Hole and Haypress pastures would all be grazed under this season of use.

- **August 1 to September 1**

- For the Ferguson pasture the season of use shall be between August 1 and September 1 in order to protect and improve resource conditions. This pasture has riparian areas that are currently recovering from historic overuse. If satisfactory riparian conditions are shown through monitoring to be achieved and maintained, then the season of use may be extended (July 16 to September 30) using the principals of adaptive management. If conditions revert back to an unsatisfactory state, then the season of use could be adjusted.
- For the Mill Creek Lake and Water Dog pastures a period of rest is being proposed due to riparian areas not meeting standards and guidelines for bank stability (see discussion on stocking rate). Upon streambanks recovering to a 60% stability level, light livestock use could be permitted between August 1 and September 1 as long as stream banks continue to recover. Upon continued trend towards recovery and achievement of satisfactory conditions stocking rates and season of use may be increased accordingly. These pastures are associated with streambank alteration concerns in the Water Dogs key area.

Table 5. Summary of the proposed action under a single combined Allotment

Pasture	Key Area	Current Condition		Current Maximum Stocking Rate Under July 16-September 30 Season of Use (divide AU by 1.32 to calculate permitted number of cow/calf pairs)		Season of Use		Estimated Light Use Stocking Rate Under Unsatisfactory Resource Conditions (AU based on season long use)		Estimated Maximum Stocking Rate Under Satisfactory Range Conditions (AU based on season long use)	
		Range	Riparian	AM	Animal Units	On Date	Off Date	AM	Animal Units	AM	Animal Units
Horse Trail/ Red Cap Pasture	Red Cap Prairie	Unsatisfactory	N/A*	49	20	16-Jul	30-Sep	23	9	51	21
	Red Cap Hole	Satisfactory	Satisfactory			16-Jul	30-Sep				
Mill Creek Lake Pasture	Elmer's Camp	Satisfactory	Unsatisfactory	49	20	1-Aug	1-Sep	7	7	14	14
Crogan Hole Pasture	Crogan Hole	Unsatisfactory	Satisfactory	49	20	16-Jul	30-Sep	10	4	22	9
Ferguson Pasture	Lower Ferguson Meadow	Unsatisfactory	N/A**	225	92	1-Aug	1-Sep	32	32	70	70
	Patterson and Mckay Meadows	N/A**	Satisfactory			1-Aug	1-Sep				
Haypress Pasture	Trinity Summit Guard Station	Unsatisfactory	N/A*	98	40	16-Jul	30-Sep	12	5	27	11
	Brett Hole	N/A***	N/A***			16-Jul	30-Sep				
Water Dog Pasture	Water Dog Lakes	Satisfactory	Unsatisfactory	88	36	1-Aug	1-Sep	34	34	68	68
				557	228	Total AM & AU:		118	91	252	193

*No riparian site at this key area **No data available ***Proposed new key area (no data available)

Mill Creek Lake Pasture and Water Dog Pasture: It has been proposed that these two pastures be rested until stream bank stability has improved to greater than or equal to 60% at the key area, at which point grazing within these two pastures may continue at light use stocking rates until satisfactory resource conditions have been met.

Additional design criteria of the Proposed Action include:

- Residual stubble height of herbaceous plant species along streambanks in unsatisfactory conditions will be 6” and in satisfactory condition areas will be 4”. Use of riparian shrub species shall not exceed the maximum amounts described in the LRMP.
 - Once the allowable use standard is reached, livestock must be moved.
- Livestock will be distributed as evenly as possible throughout suitable rangelands.
 - If livestock distribution through the use of range-riders or by other means is not effective in achieving satisfactory resource conditions at key areas, then pastures may be placed under resource protection non-use until conditions show signs of improvement.
- Ensure that range management actions maintain or improve current wildlife habitat to include, but not limited to, elk and deer
 - Avoid over grazing in riparian and meadow habitats to the point that habitat (nesting, resting, and foraging) quality is diminished by changing habitat structure and potentially changing plant species composition.
- Construct a livestock enclosure around the spring at the Red Cap Prairie key area.
- Repair the trough, spring-box and pipe at Red Cap Prairie key area in order to provide an alternative water source outside of the spring.
- Permittees will be responsible for maintaining their own access into the grazing allotments.

Adaptive Options which may be employed as the need is determined through monitoring include:

- If monitoring shows resource standards or project specific design criteria are not achieved at key areas through proposed grazing management then the following options are available:
 - Rest pastures until upward trend is observed in resource condition or until key areas are in satisfactory condition.
 - Range Riders/Herders may be used to distribute livestock to under-utilized upland areas within the pasture.
 - Improve use of salt/supplement in order to draw livestock into under-utilized upland areas elsewhere within the pasture.
 - Adjust livestock numbers.
 - Adjust season of use.
 - Adjust season long continuous use to a rest/rotation system.

Monitoring

Any change in grazing management or the adoption of an adaptive option, would be the result of monitoring within the grazing allotment. Short-and long-term monitoring will be used to determine the effectiveness of grazing management and whether or not design criteria and Forest standards and guidelines are being met. If monitoring indicates that resource conditions are

unsatisfactory, are not demonstrating improvement, or standards and guidelines are not being met, then managers would take corrective action by altering management through the adaptive process or actions authorized under administrative authority.

Short Term Monitoring: Range readiness monitoring would be conducted before livestock are turned out onto the allotment. Monitoring would ensure that key forage species are at the appropriate stage of growth, soils are not excessively moist, and that access into the project area is not blocked by snow.

Monitoring would be conducted when livestock are on the allotment. The ideal monitoring interval, which would be followed as closely as possible, would be at the approximate midpoint of the scheduled use period of a pasture and within 2 weeks before to 2 weeks after the date cattle are scheduled to leave a pasture.

Key areas and/or other designated locations would be monitored to determine seasonal grazing use of key forage species by livestock and wildlife, streambank alteration, and whether or not other resource standards are being met. Monitoring can take place anytime if needed to respond to emergencies such as drought or other impending resource concerns.

If resource standards are approaching allowable levels, livestock would be required to move to under-utilized areas. When such areas are not available, livestock would be removed from the allotment when allowable levels are met. Management adjustments would be made to the following years' Annual Operating Instructions (AOI) to avoid recurring instances of over-utilization or other adverse impacts to resources.

Long Term Monitoring: Permanent condition and trend transects, riparian benchmark sites, and other types of transects would be read approximately every 5 years to determine if range, watershed, and riparian conditions are satisfactory and stable or are maintaining an upward trend.

If either short- or long-term monitoring indicates that resource conditions are no longer meeting or moving toward Six Rivers LRMP direction, management would change. Changes in management could include (but would not be limited to) administrative actions such as adjustment of the grazing season of use, intensity of herbivory, or density of livestock grazing (which may involve changing livestock numbers or grazing access). When changes in condition warrant implementation of a management option that has not been provided for in NEPA analysis, or when the predicted effects of implementation are determined to be greater than the effects originally predicted, a new NEPA document and NEPA-based decision may be made.

Preliminary Alternative Development

Alternative 1 – No Action/No Grazing

Forest Service Policy (Forest Service Handbook 2209.13) requires the Forest Service to identify no grazing as the No Action alternative. Under this alternative, grazing would not be authorized and use of the allotments by domestic livestock would be discontinued. Existing structural improvements would remain in place but would not be maintained. Improvements contributing to resource protection or enhancement, such as water developments important for wildlife, would be maintained where feasible using other program funds. Periodic inspection of structural improvements would be used to determine whether maintenance or removal is needed. Removal or maintenance of improvements would be authorized by a separate decision. Where necessary, maintenance of allotment boundary fences would be reassigned to adjacent permittees with the understanding that livestock are to be kept off of the allotments.

Alternative 2 – The Proposed Action

The proposed action is described above.

Decision to Be Made

The Forest Supervisor is the official responsible for decisions on whether or not to authorize grazing within the project area. If a decision is made to authorize grazing, the Forest Supervisor will also decide which management practices and mitigation measures will be prescribed in the allotment management plan (AMP), including season of use, livestock facilities to be constructed, and term of the permit. The decision will be implemented through appropriate permits, AMP and annual operating instructions (AOI).

To Provide Comments and For More Information

To help you help us identify issues it is important to understand the NEPA process. For NEPA an issue is a point of disagreement, debate, or dispute about the **proposed action**. General concerns that are not related to the current proposed action's effects cannot be resolved through an alternative or mitigation and will be considered a "non-issue". An example would be that "I disagree with the proposed action". Examples of categories of issues that would be considered "non-significant" (cannot be used to generate alternatives or mitigations) are:

- Beyond the scope of the proposed action,
- Irrelevant to the decision to be made,
- Already decided by law, regulation, policy (Forest Plan, etc), or
- Conjectural in nature or not supported by scientific evidence.

An example of a non-significant issue would be: "Grazing is harmful to the environment and should be discontinued". This is a non-significant issue because grazing is a legitimate use of the National Forest as determined by the LRMP.

Significant issues (as related to NEPA) are used to formulate alternatives to the proposed action, or prescribe mitigation and monitoring measures. The most effective way of providing significant issues would be to word them in a cause and effect format. The following is a hypothetical example of a concern worded in a cause and effect format: "The proposed housing development would decrease ground cover and lead to unacceptable amounts of sediment in the adjacent river".

Your involvement in this analysis is encouraged. The enclosed form is for your convenience and to help us distribute information to you in the appropriate format.

For more information, you may contact William J. Rice at (530) 629-2118 for technical range information or Karen Kenfield at 707-441-3585 for NEPA or process information.

Trinity Summit High Country Grazing Analysis Scoping:

Oral comments must be provided at the Responsible Official's office during normal business hours via telephone (530) 629-2118 or in person (an appointment must be made). The Electronic comments must be submitted in a format such as an e-mail message, plain text (.txt), rich text format (.rtf), or Word (.doc) to: comments-pacificsouthwest-six-rivers-lower-trinity@fs.fed.us. In cases where no identifiable name is attached to a comment, a verification of identity will be required for appeal eligibility. If using an electronic message, a scanned signature is one way to provide verification.

This form will become part of the project record. If we do not receive this form or other comments from you, you will be removed from the project mailing list.

Information regarding the Trinity Summit High Country Grazing analysis will be posted on the Six Rivers National Forest web page (<http://www.fs.fed.us/r5/sixrivers/>). If you wish to participate in this process via electronic format you may send a message to the e-mail comment box, or send this form back to us at the following address:

USDA Forest Service
Attention: **Trinity Summit High Country Grazing Analysis**
Lower Trinity Ranger District, Six Rivers NF
Highway 96
P.O. Box 68
Willow Creek, CA 95573

Include your e-mail address here: _____

IMPORTANT: please include your mailing address here:

If you do not wish to participate via electronic format, please check one of the following.

- U.S. Mail
- I do not wish for any information. Please remove my name for this project.

Comments, concerns and suggestions on the proposal to authorize grazing and determine the proper management of the Trinity Summit High Country Allotment on the Lower Trinity Ranger District may be written below. Use additional sheets if necessary.