

In Reply Refer to 6840-P

Doug Young
Level 1 Biologist
U. S. Fish and Wildlife Service
20300 Empire Ave Suite 3B
Bend, OR 97701

Re: Request for concurrence on ongoing actions on bull trout for 1998-2002 ongoing actions, and proposed actions in 1999 on the Prineville District, Bureau of Land Management (BLM) in the Upper John Day River and Middle Fork John Day subbasins.

Dear Doug:

This letter serves as a request for concurrence on 1998-2002 ongoing actions and their effects on bull trout on the Prineville District, Bureau of Land Management (BLM) in the Upper John Day and Middle Fork John Day River subbasins. Grazing allotment actions previously submitted to the Fish and Wildlife Service for consultation in 1998 are not expected to change in 1999, or until the Northeast Oregon Land Exchange is completed. As such, the Prineville BLM District is requesting concurrence for 20 "may affect, not likely to adversely affect" grazing actions in the Middle Fork and Upper John Day subbasins. These actions were described in two Biological Assessments previously submitted to your agency for the 1998 calendar year. This request for long term concurrence was agreed upon between you and Gary Torretta, per telephone conversation on May 20, 1999, provided the following conditions were followed:

- Prineville BLM commit to monitoring 20% of all Category 1 pastures as outlined in the Grazing Implementation Monitoring Module
- Prineville BLM commit to submitting an annual report of its permitted grazing activities within the range of occupied bull trout habitat
- Re-initiation of consultation would occur in the event of changes to the environmental baseline, changes in the ongoing actions that alter their effect to bull trout, or if new activities are proposed within the analysis areas that may effect the species.

Also enclosed is an Biological Assessment for the South Little Canyon Timber harvest project. This assessment should be considered an attachment to the previously submitted Biological Assessment for actions in the Upper John Day subbasin. Prineville BLM also requests concurrence on our determination of "may affect, not likely to adversely affect" for the proposed timber harvest project.

If you have any further questions or need of additional information/ clarification, please contact Gary Torretta, fisheries biologist, at (541) 416-6763, or myself at (541) 416-6731. We would appreciate a letter of concurrence with the level 1 team findings from the U.S. Fish and Wildlife Service as soon as possible.

Sincerely,

Harry R. Cosgriffe
Area Manager, Central Oregon R.A.

Enclosures: Biological Assessment for the South Little Canyon Timber Sale
Timber Harvest Project Map

Final Biological Assessment (BA) for bull trout for 1998 ongoing actions (grazing) on the Prineville District, Bureau of Land Management (BLM) in the Middle Fork John Day subbasin.

Introduction

Within the Middle Fork John Day River (MFJDR) subbasin, the BLM Prineville District manages about 3,840 acres of public lands, largely which are scattered parcels 80 acres in size, or less. About 3,160 of these acres are proposed for exchange/disposal in the Northeast Oregon Assembled Land Exchange (NOALE). Refer to Table 2 and enclosed map depicting which parcels in specific allotments are proposed for disposal/exchange. The NOALE has already been consulted on for bull trout with your agency. About 2,560 BLM-managed acres are within eleven permitted grazing allotments. The remaining 1,280 BLM-managed acres are unleased, with no authorized grazing use.

The BLM is requesting consultation on these ongoing permitted actions. These action are consistent with our governing programmatic plans. Riparian habitat management concerns in these allotments have been identified and are addressed in the John Day Resource Management Plan. Two management objectives are (1) "management activities in riparian zones will be designed to maintain or, when possible, improve riparian habitat condition", and (2) "either eliminate hot season grazing...or schedule {it} on a rotational basis". These objectives should be accomplished through the adjusted grazing plans analyzed in this B.A. The BLM will provide full documentation of baseline and rationale for baseline/effects "checklist" to the lead Level 1 team for 4th field HUC B.A.'s.

Environmental Baseline Description

The BLM manages scattered tracts in the MFJDR subbasin on upland and riparian habitats from River Miles (RM) 0.0 to 43.0. The bull trout analysis area for effects determination includes all BLM-managed lands draining into the MFJDR from its confluence with North Fork John Day River (NFJDR) to RM 43.0. For analysis purposes, assessment of the baseline pathways were determined from informal field observations of BLM and private lands along the MFJDR and tributaries, excluding the uplands on National Forest lands. Over 95 percent of the land in this analysis area is privately owned, but is lightly populated. The City of Long Creek is the largest population center. The rest of the area is largely rangelands with scattered ranches, and timber lands.

Salmonid habitat has decreased in both quantity and quality in the analysis area in recent history due to increased human activities and some natural events. Land uses such as timber harvesting, road construction, livestock grazing, placer mining, agriculture practices (irrigation water diversions, and encroachment on riparian zones), and stream channelization have impacted salmonid habitat in the Middle Fork John Day River. Natural events such as insect infestations and epidemics, large catastrophic forest fires, and basin wide and localized flooding have further contributed to the degradation of riparian and instream habitats. It is difficult to estimate how land management practices may have exacerbated the severity and intensity of natural events impacting riparian habitat conditions.

Poorly managed livestock grazing, surface water irrigation diversions, stream channelization, timber harvesting, and road building activities have impacted fish habitat by damaging or suppressing riparian vegetation, impacting water quality, reducing habitat complexity, and destabilizing streambanks and watersheds (John Day River Subbasin Report, 1990). According to the Oregon Water Resources Department (OWRD, 1986), land uses in the last 125 years may have had a significant impact on the basin's capacity to retain water and release it later in the season.

Irrigated agriculture activities are minor within the analysis area, with the most use occurring near the town of Long Creek. Irrigation withdrawals in the upper Middle Fork (above Galena at RM 46) could be affecting downstream water quality. Irrigation withdrawals in some stream segments limit production of salmonids. Fish habitat problems associated with surface water diversions (reduced available and suitable habitat, unsuitable water temperatures, and dewatering of stream channels) are compounded during drought years when stream flows fall below normal (John Day River Subbasin Report, 1990). Low streamflows mainly affect the rearing and instream movement of juvenile and resident adult salmonids.

Timber harvesting on lands in the analysis area has impacted riparian habitats. Removal of timber and disturbance or elimination of non-merchantable trees or shrubs along streams have reduced shading and contributed to instability of streambanks. Timber harvest along streams has limited the recruitment source of instream and off-channel structure of large wood. Instream large wood provides rearing habitat for juvenile salmonids and streambank stability, and creates habitat complexity. Riparian habitats in the MFJDR above RM 25 appear to have retained a more significant conifer component in the riparian zone than below RM 25 to the river mouth. This may be from an elevational factor and also from more timber harvest in the riparian zone (as noticed from old stumps) below RM 25. Canopy cover on the river is minimal below RM 25, while above RM 25 it plays a larger role. Occasionally, large instream wood is present above RM 25.

Bull Trout Subpopulation Characteristics/Species Distribution

According to the Buchanan (1997), historical bull trout habitat (now presumed unoccupied) in the MFJDR extended from RM 20 to RM 39, and migratory habitat (winter use) exists from RM 39 to headwaters. Bull trout "occupied" habitat includes spawning, rearing, or resident adult, and migratory winter habitat. BLM lands within bull trout migratory habitat (RM 39-43) have no permitted grazing allotments. BLM grazing allotments may affect only historical bull trout habitat on the MFJDR, and potentially migratory habitat downstream in the North Fork John Day River.

Current spawning and rearing habitat in the Upper Middle Fork (upstream of the analysis area) is limited to Clear Creek (above Hwy 26), Big Creek, and Granite Boulder Creek. Full historic distribution and abundance is not well known, but local longtime residents report having caught bull trout in Indian, Butte, Vinegar Davis, and Big Boulder Creeks, and in Mainstem Middle Fork from Big Creek to Phipps Meadow (Claire and Gray, 1993). Migratory bull trout likely use the upper Middle Fork (from Big Creek to headwaters) seasonally. Historic habitat extends down the Middle Fork from RM 39 to RM 20 (See Map).

Water Quality

Water quality in the subbasin generally exhibits satisfactory chemical, physical and biological quality except during periods of extremely high or low flows. The most serious water quality problem in the analysis area is elevated temperatures. Most tributaries in the area are fairly well shaded. The mainstem Middle Fork does exhibit high water temperatures that threaten optimum use by cold water fish during summer months. A probable cause for this condition is degraded riparian habitat (OWRD, 1986). In 1997, water quality data was collected at RM 0.0 and 45.0 on the MFJDR. The 7-day average maximum daily temperatures were 29.2 C (RM 0.0) starting August 2, and 22.6 C (RM 45) starting August 16. Information concerning sediment problems in the area is not available.

Habitat Access

No known physical barriers to bull trout migration are within the area.

Habitat Elements

No information is available on substrate embeddedness in the area. Generally, large instream wood is rare in the Middle Fork, particularly below RM 25, but this has not been quantified. Tributaries in the area however, like Huckleberry Creek, (RM 37.7) have good quantities of instream wood and potential future supplies of instream wood. Stream survey data is not available to quantify pool frequencies and quality, but generally this area is lacking in number of pools, especially large pools, from informal observations. The MFJDR has very few off channel habitat areas and inadequate element of habitat refugia.

Channel Condition/Dynamics

No data is available on Wetted Width/Maximum Depth Ratios for the Middle Fork or its tributaries. Based on informal observations, streambank conditions generally have 90 percent stability over 50-80 percent of any stream reach (Functioning at Risk). Streambank stability is primarily provided from grasses, rock, scattered deciduous shrubs and trees and pine trees. Off channel areas are probably infrequently hydrologically linked to main channels in the Middle Fork, based on informal observations.

Flow/Hydrology

The seasonal distribution of stream discharge for the Middle Fork follows the general John Day Basin pattern. The major surface water problems are high winter and low summer streamflows. Serious erosion and sedimentation problems are localized, not basin wide. Periodic high flows carry sediment, affecting water quality and fish habitat. Low summer flows and general lack of riparian vegetation cause high water temperatures (OWRD, 1986).

Historic and current land use activities have altered the Middle Fork drainage. Mining, specifically dredging, has modified the stream channel and riparian vegetation. Timber harvest, road construction and livestock grazing contribute to the uneven distribution of subbasin discharge (OWRD, 1986). Low to moderate increases in active channel length have probably occurred in the area due to human caused disturbances, but availability of data to substantiate this is unknown.

Watershed Conditions

There are many valley bottom roads, but road densities only range from 1-2.4 miles/mi². Most of this analysis area is non-forested, but riparian areas have suffered timber harvest that has impacted habitat conditions. The level of disturbance history on private lands is largely unknown. Most forested BLM tracts have not had any significant timber harvest. It is estimated that riparian conservation areas (RHCA's) have experienced moderate to high losses of connectivity or function, particularly in the lower Middle Fork below RM 25. Conditions of RHCA's on tributary habitats is generally better however. BLM parcels on the Middle Fork and tributaries generally have a well intact vegetation under and overstory component of shrubs and conifers, and are >50% in similarity to natural community composition. Because the area is arid, resiliency of habitat to recover from environmental disturbances is moderate to low. Most scour events are likely localized.

Integration of Species and Habitat Conditions

Bull trout spawning habitats in the Middle Fork drainage (upstream of the analysis area) are isolated in three separate tributaries. According to ODFW these populations

are in "High Risk" of extinction. Cumulative disruption of habitat has resulted in a declining trend in the subpopulation size. Winter migratory habitat connects these spawning populations, but connectivity is unlikely during spawning season.

Project Description

The action being addressed by this BA is livestock grazing in the MFJDR subbasin on eleven allotments shown in Table 1. Historically most BLM grazing allotments in this area were permitted for season long use (4/1-11/30). Starting in the 1998 grazing season, the permitted season of use has been restricted on all BLM parcels that contain fish bearing and perennial non-fish bearing streams that drain eventually into migratory bull trout habitat in the NFJDR. The new permitted season of use is 4/1-5/31. Livestock operators have been contacted and informed that they are responsible for keeping livestock off these parcels after the turn off date, for most of these public land parcels are not fenced separately from surrounding private lands. The Middle Fork, Gibson Creek, and Threemile Allotments contain BLM parcels adjacent to the MFJDR that are not fenced separately from surrounding private lands. Trailing across these parcels outside of the permitted grazing season is not allowed. BLM riparian parcels within the Slickear Allotment (MFJDR drainage) are fenced within one pasture (4/1-5/31 grazing season).

Because BLM parcels in these allotments are small and scattered, all are being grouped into one BA for the MFJDR subbasin. Each allotment is shown in the enclosed maps and listed in Table 1, with allotment specific information. With the exception of the Slickear Mountain Allotment #4003, the BLM has focused little resources and monitoring on these allotments. Rather BLM has focused on larger blocks of public lands. An Allotment Evaluation was written for the Slickear Mountain Allotment in 1996, and the season of use was adjusted to spring use only (4/1-5/31) in pastures with BLM river and stream habitat.

Limited monitoring data has been collected on these allotments. Riparian photos taken on the MFJDR in the Gibson Creek (#4135) and Middle Fork (#4014) allotments in August of 1996 and June of 1998 showed a good riparian vegetation component and good bank stability. Stream canopy cover was fair to good, based on professional judgement. It appeared that livestock had not grazed those parcels along the river in 1996. Riparian trend data has not been collected on allotments in the MFJDR drainage.

Every 3-4 weeks after the turn off date, compliance monitoring of allotments will be done, with reports prepared and filed. Effort will be prioritized on the Middle Fork, Slickear and Gibson Creek allotments, which contain the majority of fish bearing stream habitat, and have the best access. Because little or no compliance monitoring has occurred on the Gibson Creek and Middle Fork allotments previously, it is difficult to

predict compliance rates from these livestock operators, especially since these BLM tracts are not fenced separately. If livestock are found on BLM riparian parcels outside of the authorized season, BLM will contact the owners to remove them. Depending whether BLM determines the unauthorized use to be willful or not, a trespass fine may be issued.

Description and Distribution of Species

Inventories and Surveys

Until recently little specific information on the status or biology of bull trout in Oregon was available. During the past decade there has been a concerted effort to find out more about the bull trout. Since 1990, ODFW, Forest Service (FS), and BLM stream survey crews have been documenting bull trout distribution and relative abundance. Bull trout distributions discussed in this analysis are referenced from the latest information from ODFW, BLM, and Forest Service fisheries biologists.

Life History of Bull Trout

Bull trout typically have more specific habitat requirements than other salmonids. Because of their specific requirements, bull trout are more sensitive to changes in habitat and less able to persist and thrive when habitat conditions are altered or degraded (Rothschild and DiNardo, 1987). Channel and hydrologic stability, substrate, cover, temperature, and the presence of migration corridors consistently appear to influence bull trout distribution or abundance (Ziller, 1992).

Adults usually spawn from August through November in the coldest headwater tributaries of a river system, and require water temperatures <10C for spawning, incubation, and rearing (Weaver and White 1985). Although migratory bull trout (fluvial or adfluvial) may use much of a river basin through their life cycle, rearing and resident fish often live only in smaller watersheds or their tributaries (second-fourth order streams) (Ziller, 1992).

Juvenile bull trout closely associate with stream channel substrates, often using interstitial spaces for cover (Fraley and Shepard 1989). A close association with channel substrates appears more important for bull trout than for other species. This specific rearing habitat requirement suggests that highly variable stream flows, bed movements, and channel instability will influence the survival of young bull trout, especially since embryos and alevins incubate in substrate during winter and spring (Reiman and McIntyre 1993).

Increases in fine sediments to streams reduce pool depths, alter substrate composition, reduce interstitial space, and cause channels to braid. These changes degrade fish habitat and reduce rearing bull trout survival and abundance (Reiman and McIntyre

1993). Bull trout usually associate with complex forms of cover and with pools. Juveniles live close to instream wood, substrate, or undercut banks and in pocket pools formed by boulders. Young-of-the-year fish use side channels, stream margins, and other low velocity areas. Older and larger fish use pools and areas with large or complex instream wood and undercut banks (Reiman and McIntyre 1993). Instream wood correlated significantly with bull trout densities in streams sampled in the Bitterroot National Forest (Reiman and McIntyre 1993).

Migratory corridors connect safe wintering areas to summering or foraging areas. Movement is important to the persistence and interactions of local populations within the metapopulation. Open corridors among populations are required to ensure gene flow, refounding of locally extinct populations, and enhancement of locally weak populations. Migratory populations of fish are likely to stray more between streams than resident populations, increasing the potential for such dispersal (Reiman and McIntyre 1993).

Water temperature is the most critical factor that influences bull trout distributions, but critical thresholds however, are poorly defined. Water temperatures in excess of 15C are thought to limit bull trout distribution (Fraley and Shepard 1989). It is not known whether the influence of water temperature is consistent throughout the life cycle or whether a particular stage is especially sensitive. Increasing water temperatures increase the risks of habitat invasion by other species that may displace bull trout.

Bull trout have very low levels of variation within populations (John Day, Umatilla, Grande Ronde Basins, etc) but are highly differentiated between populations (Spruell and Allendorf 1997). The John Day and Grande Ronde bull trout populations tend to be similar genetically, however a unique allele frequency was found in seven of ten John Day populations which was not present in any of the 11 Grande Ronde populations (Spruell and Allendorf 1997).

Bull Trout Distribution in the Middle Fork John Day Hydrologic Unit

Bull trout are indigenous to the John Day River Basin and historically had a wider distribution within the Basin than at present. Modern land-use practices in the John Day Basin have altered aquatic habitats where salmonid fishes live, including the bull trout. The current distribution of bull trout is clearly fragmented (Howell and Buchanan 1992). Bull trout in the John Day Basin are considered as one metapopulation, even though the sub-populations within the main stem, North and Middle Fork subbasins probably have no genetic interchange presently (Unterwegner, personal comm. 1997).

Presently bull trout distributions in the John Day Basin are isolated to small headwater streams within the Upper Mainstem, the Middle Fork, and the North Fork. Current

spawning and rearing habitat in the Middle Fork is limited to Clear Creek (above Hwy 26), Big Creek, and Granite Boulder Creek. Full historic distribution and abundance is unknown, but local longtime residents report having caught bull trout in Indian, Butte, Vinegar Davis, and Big Boulder Creeks, and in Mainstem Middle Fork from Big Creek to Phipps Meadow (Claire and Gray, 1993). Howell and Buchanan (1992) state that the Upper Middle Fork bull trout population segment is likely extinct. Migratory bull trout likely use the upper Middle Fork (from Big Creek to headwaters) seasonally. Historic habitat extends down the Middle Fork to about River Mile (RM) 18 (See Map).

Bull trout distributions within the Basin have been affected by an array of human caused factors. These factors are the primary reasons for the decline of local populations (Claire and Gray, 1993; Ratliffe and Howell, 1992).

Habitat Degradation

-Water temperature impacts (elevated temperatures). This is very problematic in the Middle Fork drainage where certain thermal barriers are limiting suitable spawning and rearing habitat.

-Riparian habitat loss

-Loss of instream structure and complexity

-Loss of instream large wood and potential future large wood

-Increased sediment delivery to bull trout habitats

-Food supply (reduction in anadromous fish populations)

Passage Barriers

-Natural barriers. Falls on Granite Boulder Creek (Middle Fork). Falls on S. Fk.
-Irrigation Diversions

Overharvest/Poaching

-Bull trout are aggressive by nature and readily take lures or bait, making them very susceptible to angling. Legal harvest has been higher in the North Fork drainage than the Middle Fork or Upper Mainstem. In 1993 ODFW prohibited angling harvest of bull trout in the John Day Basin

Climate Change

-Oregon is near the southern fringe of bull trout distribution. Only an isolated population in the upper Jarbridge River in Nevada occurs further south (Ratliff and Howell 1992). Bull trout may be a remnant of preglacial cold water fish fauna (McPhail and Lindsey 1986), and reductions of bull trout in the southern edges of its range has been caused at least in part by the loss of cold water habitat following the

retreat of glaciers and snowfields since the late Pleistocene (Cavender 1978). This situation has been aggravated by human-caused habitat alterations.

Analysis of Potential Effects of the Proposed Action

Habitat for bull trout (migratory) on BLM lands will be maintained through time by restricting grazing activities along MFJDR drainage perennial streams to early season use only (4/1-5/31). With spring use only grazing in pastures with perennial streams, livestock leave the riparian areas early when enough soil moisture remains in the riparian zone for nearly complete herbaceous vegetation regrowth. Herbaceous and woody vegetation along streams functions to protect streambanks from high flow scour, and also to catch and deposit sediments carried in high flow events. Little use occurs on riparian woody species, as more palatable grasses and forbs are abundant on uplands and bottomland areas.

Perennial stream segments (3.55 total miles on BLM) in these allotments range from 0.05 to 0.4 miles in length. BLM perennial stream segments are within 5 stream miles of the NFJDR (migratory habitat) in the Slickear and Threemile grazing allotments. All other BLM perennial stream segments are 10-40 stream miles from the NFJDR (See Table 2). Because the short duration grazing activities are not adjacent to occupied habitat, there is a negligible probability of take of bull trout or adverse modification of its habitat. The BLM has seen excellent riparian responses to this grazing strategy on the South Fork John Day River in the past ten years.

Potential Effects to Each Habitat Pathway/Indicator

Water Quality

Water temperatures will not be significantly affected from this project because the timing of the grazing treatment is when grasses and forbs are more palatable and preferable than woody species, which largely will be ungrazed. Regrowth of grasses also occurs after the livestock leave the parcel/pasture with stream habitats. Bull trout use habitat below the project (in the NFJDR) area only during winter and spring seasons when water temperatures are within their optimum range. Sediment and chemical contamination/nutrient levels in the analysis area will be maintained at current levels. Fine sediment has a negligible potential for increase from livestock trampling of streambanks. Regrowth of vegetation after the short use period will recover most areas trampled by livestock, thus minimizing areas that could be subject to erosion during winter and spring high flows. No spawning or incubation habitat exists below the project area, so this element would not be affected. Instream nutrient levels in the analysis area may experience minor increases in the short term from livestock wastes. Water flows are high during this season so the dilution factor would mitigate the effects of nutrient additions. No effect is anticipated from chemical contaminants.

Habitat Access

This action will have no physical effect on the species ability to access habitats upstream and downstream of analysis area.

Habitat Elements

No rearing areas exist below the project area. Slight increases in sedimentation from grazing activities could affect the forage base of migrating bull trout in the NFJDR, but this effect would be immeasurable, and not significant to increase cobble embeddedness. This project will maintain current and future floodplain woody debris in the area. Spring grazing activities are not likely to effect woody species that could become future woody debris. Pool frequency and quality will not be affected measurably because of the reasons discussed about substrate embeddedness. Large pools, off channel habitat, and refugia in the NFJDR below the analysis area would not be affected significantly from actions that are 3 to 40 miles upstream on only 3 miles of BLM stream habitat.

Channel Condition & Dynamics

Minimal or unmeasurable effect to width/depth ratio or floodplain connectivity is expected in the area or downstream in occupied habitat. Short season of grazing use minimizes impacts to these parameters. Grazing activities and animal trampling may degrade streambank conditions slightly in the analysis area, but would not effect occupied habitats in NFJDR downstream.

Flow/Hydrology

This action is not likely to effect changes in peak base flows or lead to increases in drainage networks within the analysis area. This indicator is primarily affected by timber harvest activities which alter snow retention and snowmelt timing. This activity covers a very small portion of the analysis area, and occurs for only two months each spring, thus minimizing impacts to ground cover vegetation that maintains watershed hydrological functions.

Watershed Conditions

This action will not effect road densities, or percent ECA, for no road building, or timber harvest is proposed in the analysis area. Conditions of RHCA's should be maintained, for reasons discussed under "Analysis of Potential Effects of the Proposed Action". Woody riparian species should experience near natural rates of recovery with spring grazing treatments. Disturbance related to this action are temporary (removal of streamside vegetation) with nearly full regrowth anticipated by the end of the growing season.

Integration of Species and Habitat Conditions

Because the proposed action is downstream of all occupied habitat in the MFJDR basin, it will not effect the connectivity of occupied habitat in the MFJDR basin.

Determination of Effects: Dichotomous Key for Making ESA Determination of Effects

1. Are there any proposed/listed fish species and/or proposed/designated critical habitat in the watershed or downstream from the watershed?

YES.....Go To 2

2. Will the proposed action(s) have any effect whatsoever on the species and/or critical habitat?

YES.....Go To 3

3. Will the proposed action(s) have the potential to hinder attainment of relevant "functioning appropriately" indicators?

NO.....Go To 4

4. Does the proposed action(s) have the potential to result in "take" of any proposed/listed fish species or destruction/adverse modification of proposed/designated critical habitat?.

A. There is a negligible (extremely low) probability of take of proposed/listed fish species or destruction/adverse modification of proposed/designated critical habitat.

.....Not likely to Adversely Affect

Discussion: The environmental baseline description in the preceding matrix shows that the BLM is a minor landowner in the MFJDR basin and that data concerning habitat conditions for the private and BLM lands in the analysis area generally is lacking. The matrix also shows that riparian and aquatic conditions on BLM lands will be maintained with implementation of this project. Riparian management objectives outlined the John Day RMP should be maintained with this project as well as the pathway indicators listed in the matrix. These objectives will be met by limiting grazing activities in allotments with riparian areas to short spring treatments, followed by scheduled compliance monitoring.

The BLM's assessment is that the proposed actions for 1998 in the MFJDR subbasin (grazing) may affect, but is not likely to adversely affect the bull trout or its habitat. Four allotments were determined to have no effect to downstream bull trout habitats (See Table 1). These allotments are upland, 40 acre parcels, with no perennial or

intermittent streams. We would appreciate a letter of concurrence with our findings from the U.S. Fish and Wildlife Service at your convenience.

Enclosed is the Checklist for documenting Environmental Baseline and Effects of Proposed Action(s) on Relevant Indicators, and a List of Ongoing Range Management Actions (Table 1). Assessment of Environmental Baseline and Effects of the Actions were determined using information from 1997 water quality monitoring studies, ocular riparian assessments, and professional judgement.

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Table 1. RANGE MANAGEMENT PERMITTED ACTIONS: 1998 ONGOING MIDDLE FORK JOHN DAY SUBBASIN - HUC # 17070203 PRINEVILLE DISTRICT BLM

Allotment Name	BLM Acres	Season of Use ¹	Permitted AUM's	Critical Habitat ²	300' FB Stream ²	150' N-FB Stream ²	100' Inter. Stream ²	Effects Determin ³
Slickear Mountain #4003	1,120	4/1-5/31	183	0.0	1.1	0.4	1.7	NLAA
Slide Creek #4010	40	4/1-11/30	5	0.0	0.0	0.0	0.0	NE
Middle Fork #4014	562	4/1-5/31	77	0.0	1.2	0.0	0.6	NLAA
Sidehill #4026	40	6/1-10/15	6	0.0	0.0	0.0	0.0	NE
Bullock Gulch #4033	40	4/1-11/30	5	0.0	0.0	0.0	0.0	NE
Threemile #4046	80	4/1-5/31	8	0.0	0.4	0.0	0.0	NLAA
Lookout #4134	119	5/1-10/1	15	0.0	0.0	0.0	0.5	NLAA
Gibson Creek #4135	120	4/1-5/31	20	0.0	0.25	0.0	0.0	NLAA
Baldwin Gulch # 4136	320	4/1-5/31	53	0.0	0.2	0.0	0.0	NLAA
Keeny Point #4157	40	4/1-8/31	5	0.0	0.0	0.0	0.0	NE
Pass Creek #4184	80	4/1-11/30	10	0.0	0.0	0.0	0.3	NLAA

Footnotes:

- 1 All allotments are cattle operations
- 2 Miles of Stream on Public Lands, FB = fish bearing stream, N-FB = non-fish bearing stream, Inter. Stream = intermittent stream
- 3 NE = no effect to bull trout or habitat, NLAA = not likely to adversely affect bull trout or habitat

Table 2. DISTANCE TO OCCUPIED BULL TROUT HABITAT IN THE NORTH FORK JOHN DAY RIVER AND NOALE STATUS

Allotment Name	Riverine Miles to Occupied Bull Trout Habitat	NOALE Disposal or Retention Parcels in Allotment
Slickear Mountain #4003	1.0	Disposal and Retention
Slide Creek #4010	33.0	Disposal
Middle Fork #4014	22-35	Disposal and Retention
Sidehill #4026	37	Retention
Bullock Gulch #4033	25	Disposal
Threemile #4046	3	Disposal
Lookout #4134	25	Disposal
Gibson Creek #4135	15-24	Disposal and Retention
Baldwin Gulch # 4136	12	Disposal
Keeny Point #4157	25	Disposal
Pass Creek #4184	13	Disposal