Western Watersheds Project
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Working to protect and restore Western Watersheds and Wildlife

Jeremy Sullens, ATTN: Kaleigh Maze
Attn: Katie Metraux, Acting OHMVR Planning Manager
Happy Camp/Oak Knoll Ranger District
Klamath National Forest
63822 Highway 96, P.O. Box 377
Happy Camp, CA 96039

Via email: Ranger Jeremy Sullens (jjsullens@fs.fed.us),
Kaleigh Maze (kaleigh.maze@usda.gov), Don Flickinger (Donald.Flickinger@noaa.gov)

And web portal

February 24, 2020

RE: Oak Knoll Range Project Environmental Assessment

Dear Mr. Sullens,

The Oak Knoll Grazing Project seeks to reauthorize grazing that has been documented to degrade Critical Habitat for the federally threatened Southern Oregon/Northern California Coast (SONCC) Coho salmon evolutionarily significant unit (*Oncorhynchus kisutch*), and to trample banks delivering sediment to the sediment impaired Klamath River which we believe is in violation of the Clean Water Act.

Western Watersheds Project is a non-profit organization with more than 12,000 members and supporters. Our mission is to protect and restore western watersheds and wildlife through education, public policy initiatives, and legal advocacy.

Cattle on the East Beaver Allotment have been documented degrading Coho salmon Critical Habitat both directly by trampling streambanks and indirectly by removing shade cover over streams upstream. Please close the Allotment in order to end these impacts and to help restore Klamath River Coho. At least consider changing the grazing period and the number of cattle allowed to graze so that salmonids are better protected, especially in the spring and fall.

The Environmental Assessment (EA) states (at 35):

> *Carex nervina:* There are three known occurrences of this species in the analysis area. This species typically occurs in montane meadows and suitable habitat is present in other meadow areas within the analysis area. The wet, open habitat in which this species occurs tends to see heavy use by cattle. Cattle may directly affect individuals through trampling and grazing. Extensive trampling that affects vegetative cover and hydrological regimes would indirectly affect individuals by decreasing the suitability of habitat. However, the main growing points for sedges are near ground level which allows for some resiliency to grazing and trampling. Therefore, managing allotments to the agreed-upon utilization standards would provide for the continued persistence of these occurrences despite direct effects from cattle drift.

This description of heavy utilization on wet-meadow sedges by cattle may reduce the cover of this species over time, and increase bare ground, erosion, and sedimentation into downstream waters. Sedimentation such as this will impact salmonids by infilling spawning gravels.

Thank you for considering these comments. Western Watersheds Project thanks you for this opportunity to assist the Klamath National Forest by providing scoping comments for this project. Please keep Western Watersheds Project informed of all further substantive stages in this and related NEPA processes and documents by contacting me at lcunningham@westernwatersheds.org.

Sincerely,

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