Data Submitted (UTC 11): 6/14/2013 12:00:00 AM
First name: Tyler
Last name: Alexander
Organization: Klamath SIskiyou Wildlands Center
Title:
Comments: June 14, 2013

Dave Hays
United States Department of Agriculture, Forest Service
Klamath National Forest
11263 N. Highway 3
Fort Jones, CA 976032-9702

Re: Middle Thomkins Allotment/Lake Mountain Allotment Grazing Permit Renewal

Dear Mr. Hays,

Klamath Siskiyou Wildlands Center appreciates the opportunity to comment on the proposed Middle Thomkins/Lake Mountain grazing proposal renewal. We are pleased to learn that part of the Lookout Springs redevelopment includes plans for an enclosure to be constructed around the springhead and seep. Furthermore, the removal of 4,697 acres from the boundaries, albeit no “suitable forage exisit[ed]” in that area, is a welcome change. However, the proposal to increase the Middle Thomkins Allotment by 2,034 acres is of concern to us. The fact that these areas are currently being utilized for foraging is distressing. Does the agency offer any explanation as to this previous and ongoing violation? Accurate annual information about rested pastures is important to us and must be a bedrock of agency analysis and informed decision making.

Given the most recent AOI, ecological state, and history of negative ecological and hydrological impacts from grazing abuse in the Klamath National Forest, we oppose the renewal of these two Allotments as proposed in this planning process. Patterns of unauthorized livestock grazing and failure to meet basic grazing standards warrants the cancellation of both permits. Additionally, the issue of whether or not a “renewal” of the Middle Tompkins Allotment is even appropriate is unclear considering it’s been in a state of non-use for nearly half of a decade. 43 CFR § 4130.2(g)(2)

Compatibility with Federal, Regional, State, and Local Land Use Plans

Conflicts between the proposed action and the objective of any other Federal, regional, State, and local land use plans for the relevant area must be analyzed. 40 C.F.R. § 1502.16 and § 1506.2(d). The analysis must show that the proposed action is compatible with the Land and Resources Management Plan, the Wilderness Act, the Migratory Bird Treaty Act, the NEPA, the NFMA, the Clean Water Act, the Endangered Species Act, and the National Historic Preservation Act, as well as any other state and federal legislation pertaining to public lands.

Monitoring

The Environmental Assessment should include information concerning prior monitoring efforts on the two

Allotments. Specifically, the Middle Tompkins Allotment has been “retired” for c. 5 years. Data collected during this time needs to clearly reflect this fact.

Additionally, given that adjacent Allotments are exhibiting problems that include , but not limited to:

1.Uneven Utilization
2.Riparian Degradation
3.Water Quality Degradation
4.Wetland Destruction
5.Patterns of Permittee Abuse
6.Lack of Rangeland Assessment Data
7.Competing Uses

It would seem that existing utilization monitoring techniques have proven inadequate. The analysis needs to include prior and proposed monitoring efforts on the Allotments. A monitoring standard that relies on quantitative data to determine the actual impact livestock will have on Allotment plant species, wildlife, and other resources present is preferred. The Service’s disregard for their own standard of allowable utilization levels in key areas has rendered the grading system ineffective. See 2008 Middle Tompkins Allotment AOI (where for every year recorded, and at every location monitored, utilization level figures were grossly above capacity). The purpose of this proposed action is to “ensure available forage resources on suitable range throughout both allotments will be properly utilized by permitted domestic livestock.” While potential improvements to the Lake Mountain Allotment have been proposed so it “will be properly utilized”, the Middle Tompkins Allotment renewal solely proposes the expansion of existing boundaries. Yet, the utilization levels have consistently failed to meet basic standards.

Alternatives

In order to satisfy the range of reasonable alternatives requirement2, the RADs for the Middle Tompkins/Lake Mountain Allotments should include at a minimum:
1)Issuing the new permit with the same terms and conditions of the expired permit.
2)Any reasonable alternative the field office may develop that differs from the applicant’s proposal.*
3)A no action for plan modifications
4)Finally, a no action/grazing alternative
*Given the declining health of the rangelands in the Klamath National Forest a detailed grazing strategy with reductions (e.g. changed stocking levels, length of season, and/or season of use) should be included into the RADs.

Economic Resources-Game Animals

The effects that livestock grazing will have on game within the proposed action area should be quantified. Black-tail deer and Roosevelt Elk are a valued local resource and the impact should be measured to determine the cost-benefit of livestock grazing in this area.

Management Indicator species

In order to comply with NFMA and the LRMP, an effects analysis for LRMP Management Indicator Species must be performed. The assessment will gauge the effects of the proposed management activities on those populations. FSM2620.

Biological Resources – Animals

The project area provides important habitat for wildlife. Livestock grazing may directly, indirectly, and

cumulatively impacts these Threatened and Endangered species through trampling, disturbance, habitat disturbance and destruction, competition for forage, loss of cover, changes to plant cover, ecological community disruption (increase in predatory competitors), and changes in water quality. Fences, while potentially a mitigating factor, may also fragment habitat and populations. Specifically, the T & E species found within the boundaries of the proposed action area include , but may not be limited to:

Strix occcidentalis caurina (northern spotted owl)

Light to moderate grazing reduces rodent densities and diversity. Rodents are clearly an important prey item for the northern spotted owl. Furthermore, it has been shown that Ravens, benefit from livestock presence, and will use stock tanks and troughs. It logically follows that livestock grazing on the allotments has the propensity to negatively impact the northern spotted owl population.

Martes pennant (pacific fisher)

The pacific fisher relies on suitable foraging and denning habitat for survival. Among the fisher's diet are mice, shrews, voles, vegetation, and fruit. Livestock grazing diminishes available vegetation upon which the fisher relies, and also attract ravens that prey upon rodents.

As well as these Threatened & Endangered amphibians:

Brachyrampus Plethodon asupak (Scott Bar salamander)
Plethodon stormi (Siskiyou Mountains salamander)

The environmental analysis must provide enough detailed information to conclusively know that the project will have no significant effect on threatened, sensitive, and management indicator wildlife species. 40 C.F.R. § 1508.27.

Migratory Birds
We hereby identify the direct, indirect and cumulative impacts of grazing on neotropical, migratory and ground birds as a significant issue for this project. We are concerned by the agency's lack of population and habitat data for these species and are particularly worried about impacts to Willow Flycatchers, their habitat and their reproductive and nesting success.

Biological Resources – Plants

Grazing poses a threat to potential T&E plant species found within the Allotment area. There are a number of rare plants found within the Allotments. A field survey must be conducted to provide a complete inventory and assessment. Threatened and Endangered plants on the Allotments may include1, but are not limited to:
Calochortus persistens (Siskiyou mariposa lily)
Phlox hirsuta (Yreka phlox)

A site-specific review and analysis on the effects of the proposed action and alternatives of the above species needs to be included. These plants are susceptible to being eaten or trampled by cattle. This is also required by NFMA, 16 USC 1600 et seq., its implementing regulations, and the LRMP. Adequate safeguards must be in place to protect these species and their habitats; potential impacts to these plants must be mitigated. A complete assessment of these Allotments will include a site-specific survey of these plants.
Soils

The Environmental Assessment should include maps of soil types found within the Allotments' boundaries. The analysis should consider the consequences of grazing on soils, whether those impacts are primary, secondary,

or incidental.

Aquatic Systems & Life
The Scott River watershed supports one special-status fish species. On February 25, 2004 the California Fish and Game Commission determined that coho salmon from Punta Gorda north to the Oregon border should be listed as a state Threatened species. The Environmental Analysis must take into account any cumulative effects that grazing will have on the Scott River watershed's coho salmon. Water temperatures in the Scott River can be limiting for salmonids, particularly in dry years, and can certainly be affected by riparian alteration. A complete analysis will take this into account.
The Scott River watershed supports six CDFG fish species of special concern: Chinook salmon; steelhead; Klamath river lamprey; river lamprey; Pacific lamprey; and Miller Lake lamprey. A detailed analysis of the potential cumulative impacts to these species should be included. Additionally, the green sturgeon is listed as threatened and resides within the Seiad Valley quadrant.
The Northwest Forest Plan states the need to keep cows out of riparian areas:
GM-1. Adjust grazing practices to eliminate impacts that retard or prevent attainment of Aquatic Conservation Strategy objectives. If adjusting practices is not effective, eliminate grazing.

GM-2. Locate new livestock handling and/or management facilities outside Riparian Reserves. For existing livestock handling facilities inside the Riparian Reserve, ensure that Aquatic Conservation Strategy objectives are met. Where these objectives cannot be met, require relocation or removal of such facilities.

Cattle degrade the aquatic ecosystems on grazing allotments. Riparian areas in the (streams and wetlands) within these Allotments will be negatively impacted by the proposed grazing. The environmental analysis must explore where and to what extent grazing has impaired stream banks and vegetation near streams in the past, and also to what extent the proposed action have in the future.
Specifically, the California Department of Fish & Wildlife has stated "Grazing of livestock in the riparian or aquatic habitat of the Scott River or its tributaries can have deleterious effects on riparian species through habitat destruction. This would be a significant impact."
-Scott River Watershed-wide Permitting Program at 3.4-33
Invasive Species
The NEPA analysis must identify effective preventions of livestock contributing to reproduction and establishment of new or existing non-native species or noxious weeds. Native plant species are severely diminished by the spread of invasive species effectuated by grazing.
Non-native plant species alter ecosystems by increasing fire frequency, reducing wildlife habitat, disrupting nutrient cycling and hydrology, and increasing topsoil loss. Livestock increase the ability of non-native plants to invade native plant communities by disturbing vegetation and soils. Livestock transport non-native seeds in their hair, digestive tracts and in the mud on their feet. Marlahan mustard, Klamath Weed, knapweed, starthistle, and other invasive plants are likely invading the wilderness, due to the disturbance pressures from grazing. The spread of these noxious weeds into the wilderness adversely affects wilderness characteristics.
In addition to the intrinsic costs of ecological degradation by grazing, the California Invasive Plant Council estimates that invasive plants cost California $82 million dollars per year. The costs associated with invasive species growth are substantial and need to be properly evaluated by the environmental assessment.

Klamath Siskiyou Wildlands Center thanks you for the opportunity to assist by providing scoping comments for the Middle Tompkins/Lake Mountain Project. If you have any questions regarding these comments please feel free to contact me by telephone (541-324-9394) or by email at alexander@lclark.edu.

Sincerely,

/s/ Tyler Alexander, Law Clerk
Klamath Siskiyou Wildlands Center
PO Box 102
Ashland, OR, 97520

Reference:

Belsky, A.J., Gelbard J. L., 2000. Livestock Grazing and Weed Invasions in the Arid West. Oregon Natural Desert Association.

Ecological Applications, 2006. The Ecological Society of America. pp. 16(3) 1010-1025.

Forsman, E. D., Meslow, C. E. and Wight, H. M. 1984. Distribution and biology of the spotted owl in Oregon. Wildl. Monogr., 87: 1-64.

Jones, A. 2000. Effects of cattle grazing on North American arid ecosystems: a quantitative review. Western North American Naturalist, 60: 155-164.

Powell, R. A., Buskirk, S. W. and Zielinski, W. J. 2003. Fisher and marten. Wild Mammals of North America: Biology, Management, and Conservation, pp. 635-649.

Hart, R. H., Samuel, M. J., Test, P. S. 1998. Cattle, Vegetation, and Economic Responses to Grazing Systems and Grazing Pressure. Journal of Range Management, Vol. 41 No. 4 282-286.