Data Submitted (UTC 11): 2/21/2020 8:00:00 AM
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Comments: As noted in the comment, we protest the combination of scoping and comments on the draft EA and we would like to know from you under what authority KNF managers made that decision. Also as noted, we are disappointed that the proposed decision does not address the full scope of the cattle trespass problem along the Siskiyou Crest or the full scope of the problem of KNF permitted cattle directly and indirectly degrading Critical Habitat (CH) for Coho salmon. We strongly recommend withdrawing the Draft EA and developing an EIS that aims to finally and completely eliminate trespass onto the RR-SNF and cattle-caused degradation of Coho CH.

Please contact me to inform me of where in FS NEPA Regulations combining scoping and Draft EA commenting is authorized?

These comments are submitted on behalf of the Project to Reform Public Land Grazing (Project) and the Klamath Forest Alliance (KFA) which is also a sponsor of the Project. KFA is also submitting comments separately from its Southern Oregon office.

We protest the combination of scoping and comment on the Draft EA for this proposed Project into a single 30 day period. We question whether proper notice was given (the Grazing Reform Project was not noticed) and we would like to know the legal authority you used to justify the combination of these two critical NEPA processes. Regardless of legality, 30 days is too short a time to analyze and respond to the Draft EA and associated documents. Because of the controversy over grazing in this area, the decades long and unsolved cattle trespass issue and the documented degradation of Critical Habitat for ESA-listed SONC Coho Salmon by permitted cattle, the proposed project requires an EIS.

The Project and KFA have been monitoring grazing on both the Klamath National Forest (KNF) and Rogue River-Siskiyou NF (RR-SNF) sides of the Siskiyou Crest, including the East Beaver Grazing Allotment and cattle trespass across the Siskiyou Crest, since 2013. During those seven years three local volunteers and the Project Coordinator have visited the Siskiyou Crest Grazing Allotments on both forests many times and have documented the persistent failure of Forest Service (FS) managers to address long-standing grazing issues and impacts, including issues and impacts related to the East Beaver Grazing Allotment, as well as other Siskiyou Crest Allotments.

Over those seven years we have issued eight Allotment Monitoring Reports that include Siskiyou Crest Allotments, including the East Beaver Allotment. These reports detail and document with photos and field notes the impacts of poorly managed grazing. They document several long-standing management problems which documents reveal FS managers have known about for a long some time, and in some cases decades, but that these managers have failed to adequately address. Major unresolved management problems and unaddressed impacts of the East Beaver Grazing Allotment and grazing on the Siskiyou Crest include:

? Decades of cattle trespass mainly by cattle permitted to graze on the Klamath National Forest

(KNF) onto headwater basins of the Rogue River-Siskiyou National Forest (RR-SNF) and the resulting accelerated degradation of water quality, headwater hydrology, riparian areas and willow wetlands. Significant, long-standing, ongoing cattle trespass from the KNF onto the RR- SNF include cattle from the Horse Creek and Dry Lake Allotments as well as cattle from East Beaver Allotment.

? Decades of cattle permitted to graze on the Klamath National Forest being allowed to reach the Siskiyou Crest Area long before they are supposed to be there (which is mid-July) and, for the most part, not being noticed by absent FS managers and, therefore allowed to remain on the Crest before July 15th. The resulting degradation of the Siskiyou Crest includes allowing the extensive [ldquo]barrens[rdquo] on the Crest to remain barren or occupied by disturbance and exotic species. These areas should be dominated by native bunchgrasses as historical records tell us was the case before grazing began along the Crest. Monitoring of Siskiyou Crest Allotment that have been [ldquo]vacant[rdquo] for a decade, including the Carberry and upper portions of the Big Applegate Allotment, demonstrate that native bunchgrasses will reoccupy these [ldquo]barrens[rdquo] if they are [ldquo]rested[rdquo] from grazing for a decade or
more. We look forward to the day when FS managers allow these bunchgrasses to recover in the only manner that is effective: at least A decade of no grazing.

? Because unmanaged season-long grazing with only occasional herding triggered by public complaints has wiped out or greatly reduced dry land bunchgrasses in the Project Area, cattle permitted to graze on the Crest, East Beaver and other allotments have become increasingly dependent on riparian areas and wetlands for forage. Competition for riparian and wetland forage has intensified in recent years because FS managers have failed to reduce the number of cattle permitted to graze to adjust for the increased use of forage by expanding elk herds. The result of decades of unmanaged season-long grazing and failure of FS managers to reduce stocking (the number of cattle permitted to graze) is significant degradation of water quality, damage to headwater hydrology which reduces baseflows in streams, destruction and fragmentation of willow wetlands and the resulting local extirpation of Willow Flycatcher (WIFL) via the destruction of their breeding habitat by cattle.

? Permitted grazing within the Project Area begins during the spring and extends until the middle of October. Within the Beaver Creek Watershed this extended grazing season results in the degradation of Critical Habitat (CH) for ESA-listed Coho Salmon in violation of the Endangered Species Act. FS managers now propose to fence one of the locations where the project has documented yearly destruction of Coho CH to exclude cattle. This is a token gesture that will displace but not end the adverse modification of Coho CH. The only way to effectively end the degradation is to eliminate those areas which include unfenced Coho CH from the East Beaver Allotment.

Recommendation: The Decision for this Project should eliminate spring grazing from the East Beaver Allotment and adjust its boundaries to exclude Coho CH. Spring grazing should be limited to the Ash Creek and Hornbrook Allotments and the number of cattle permitted to graze on East Beaver Allotment should be adjusted downward as a result.

? The manner in which the grazing allotments in the Project Area have been managed, that is, the allowance of season-long grazing with minimal herding over a long period of time, has cumulatively damaged not only the beneficial uses of water but also the ability of the areas wetlands, riparian areas and meadows to store carbon. The use of modern grazing methods, if properly administered, can reverse the process and build carbon stores. That should be a consideration for decision makers on this Project and on every project that impacts public land ability to store carbon.

Recommendation: Given the primacy of the climate issue and climate adaptation, this and all grazing decisions should mandate site specific best management practices for grazing allotments, utilizing the appropriate modern grazing management methods. In this respect, please consider the UN[rdquo] Special Report on Climate Change and Land[rdquo] at https:// www.ipcc.ch/srccl/

For seven years our Allotment Monitoring Reports, email and other communications to responsible FS rangers and staff have included specific recommendations for how to deal with these and other documented management problems and associated impacts. Because we have been out on and have monitored these allotments much more than FS staff and decision makers, these Allotment Monitoring Reports are key information that should be considered by managers as they decide whether or not to reauthorize grazing on the East Beaver and other allotments.

The Project[rsquo]s Allotment Monitoring Reports can be read and downloaded at this Dropbox link: https:// www.dropbox.com/sh/ab81gdt4vnx46os/AAD4CSAHMpFTh74OmlAGR-nZa?dl=0. Below are links to the individual Allotment Monitoring Reports that are relevant to this analysis and the decision to be made on whether or not to reauthorize grazing in the project area:

? https://www.dropbox.com/s/ho6mqvzc5pswxo0/Project%20Report%204.07_HorseCr%26DryLk%20Allots_Sept%206-8%202013_final.pdf?dl=0

? https://www.dropbox.com/s/h2r92qt7dn8mb7a/Project%20Report%206.01_DryLk%20%26%20HorseCr_5-31-15%20%26%206-1-15_final.pdf?dl=0

? https://www.dropbox.com/s/irk3kztvi0f51k0/Project%20Rpt%206.02_SiskCrest%20Or-Ca_Aug%206-9%202015_final.pdf?dl=0

? https://www.dropbox.com/s/eu7zg7uv4dfp8ly/Project%20Rpt%207.01_HorseCr-DryLk-EBeaver_June%2026-29%202016_final.pdf?dl=0

? https://www.dropbox.com/s/y9nfrexwmjx9g1p/Project%20Rpt%208.01_SiskCrest_Aug%207-10%202017.pdf?dl=0

? https://www.dropbox.com/s/tbj3ub5uprhh436/Project%20Rpt%209.01_SiskiyouCrestAllots_6%202%263-18_final.pdf?dl=0

? https://www.dropbox.com/s/9m4sfma7vcia5dt/Project%20Rpt%209.03_2018%20Livestock%20Removal_KNF%20Westiside_Jan%202019_final.pdf?dl=0

? https://www.dropbox.com/s/nczidkyr8ovnm1j/Project%20Rpt%2010.02_SiskCrestAllots_9-26%2627-19.pdf?dl=0

Please read and consider all eight reports which contain information for allotments associated with the Siskiyou Crest grazing allotments on the KNF and RR-SNF.

Detailed Comments

1. The livestock trespass issue:

Several of the Project[rsquo]s Allotment Monitoring Reports include documentation of trespass onto headwater basins of the RR-SNF by cattle permitted to graze on the East Beaver, Dry Lake and Horse Creek Grazing Allotments, including photo documentation showing brands and ear tags. Our extensive

experience on the Siskiyou Crest and these allotments clearly indicates that the trespass issue can not be adequately addressed unless trespass from the contiguous Horse Creek, Dry Lake and East Beaver Grazing Allotments is addressed. In fact, our long experience with this area has convinced us that effective action to solve the long-standing trespass issue should include decisions on grazing management on both the KNF and RR-SNF sides of the Siskiyou Crest. As we wrote to Ranger Sullens, the responsible federal official on January 13, 2020:

[ldquo]We've learned that there are limited options to solve/resolve the cattle trespass problem. These are:
[bull] Fence the entire boundary between the KNF's East Beaver, Dry Lake and Horse Creek Grazing Allotments and RR-SNF allotments with numerous gates for PCT hikers.
[bull] Eliminate the Siskiyou Crest Area from East Beaver, Dry Lake and Horse Creek Allotments; these would become spring only allotments at lower elevation. It would take a lot of lead cow culling and herding to get this to work. Impacts to Coho Critical Habitat would likely increase.
[bull] Unify allotments on both forests across the Crest and manage the new allotments via modern grazing methods, including rest rotation grazing.[rdquo]

The proposed action will not resolve the trespass issue and for that reason it will be strenuously opposed. We urge FS managers to step back and take the time to forge a real solution to the long-standing cattle trespass issue and the associated degradation.

2. Failure to allow the recovery of dry meadow bunchgrasses along the Siskiyou Crest:

FS managers and grazing staff maintain that the extensive [ldquo]barrens[rdquo] along the Siskiyou Crest are not capable of recovery. Seeding and other FS recovery efforts have failed. But actual conditions on the Crest, documented by the Project, clearly show that cattle continue to graze on the barrens and that barrens of the same soil type on nearby Crest Grazing Allotments that have been vacant for a decade are recovering, including bunchgrasses. This clearly demonstrate that dry meadow bunchgrasses will recover and dominate Siskiyou Crest dry meadows, the current [ldquo]barrens,[rdquo] if cattle grazing is eliminated for a decade or more. These facts are illustrated by photos on the next page:

Recommendation: The destruction of dry meadow bunchgrasses as a result of poorly managed grazing, and the accelerated grazing pressure on riparian areas and wetlands can only be reversed by resting the Siskiyou Crest Area for at least a decade. The Oak Knoll Grazing decision should implement a decade long [ldquo]Rest for the Crest[rdquo] from all grazing.

3. Failure to implement Modern Grazing Management practices that long-term FS/UC Rangelands meadow monitoring indicates are needed to prevent excessive levels of riparian, wetland, water quality and baseflow degradation:

Grazing permit holders have not adequately herded their cattle in order to disperse impacts among the various pastures of the allotments and FS managers are not monitoring the allotments often enough to know when herding instructions are not being followed. In particular, instructions and management have not prevented cattle permitted to graze on the East Beaver Allotment from reaching the Siskiyou Crest Area significantly before the July 15th date before which cattle are not supposed to be on the Crest. Herding has also not been sufficient to prevent degradation of Coho Critical Habitat, particularly during the spring and fall. Managers have not given specific enough direction to permit holders to implement rest-rotation grazing and other modern grazing methods.

Under contract from and in collaboration with the Forrest Service, UC Rangelands has been [ldquo]reading[rdquo]

and reporting on long term meadow monitoring plots across California[rsquo]s national forest grazing allotments. UC Rangelands findings and recommendations resulting from this long-term monitoring of meadow conditions on California NF grazing allotments include:
[bull] Long-term loss of "hydric" plants indicating that wetlands are being dried out. This is something
the Grazing Reform Project has documented on Siskiyou Crest and other KNF grazing allotments.
[bull] Based on their long term monitoring findings, UC Rangelands asserts/confirms that:
"Management of livestock distribution is a critical management activity to enhance and sustain riparian health in mountain meadow grazing systems. Simple distribution tools such as herding, salting, and off-stream water are effective for protecting riparian areas, but management effort must be invested to assure success."
The peer-reviewed publication that presents these finds is [ldquo]Riparian Meadow Response to Modern Conservation Grazing Management[rdquo] which is available on line at this link:

https://link.springer.com/article/10.1007%2Fs00267-017-0897-1

Here is the critical summary graph and associated text revealing a long term decrease and loss of [ldquo]wetland obligate plants[rdquo]:

Long-term change ([Delta]) in allotment scale plant community metrics in 279 plant community monitoring plots in riparian meadows across California (n = 279). Metrics are species richness (S), diversity (H[prime]), and the relative frequencies of forb, non-native, wetland obligate (OBL), and upland species (UPL).
Dark lines represent the median. Top and bottom box boundaries represent the 75th and 25th percentiles, respectively. Top and bottom whiskers represent the 95th and 5th percentiles, respectively.

Impacts resulting from FS managers failure to get permit holders to adequately implement rest-rotation grazing include:
? Hydromodification of headwater wetlands resulting in larger flood flows and decreased base flows.
? Degradation of water quality as a result of excessive bank trampling, shade removal and deposition of bovine waste (nutrients and bacteria).
? Overutilization of available forage within preferred locations where poorly herded cattle congregate for long periods and the resulting over-grazing which the Project has documented.

These controllable impacts degrade Coho Critical Habitat and result in unauthorized and unnecessary [ldquo]take[rdquo] of that EA-listed species as illustrated by photos on the next page.

Recommendation: If grazing on the East Beaver Allotment is reauthorized, the Decision should include timely adoption of site specific BMPs, including a mandated and specific rest rotation grazing schedule designed to prevent cattle from accessing the Crest Area too early in the season and from accessing Coho Critical Habitat at any time. Managers should also request staffing adequate to monitor and enforce implementation of the rest-rotation grazing schedule. As UC Rangelands/FS long-term monitoring clearly indicate, failure to order adequate rest-rotation herding and failure to adequately monitor and enforce rest-rotation implementation will result in loss of wetland habitat and water quality degradation in violation of applicable standards.

4. Protection of Coho Critical Habitat:

The proposed Project includes a proposal to fence Coho Critical Habitat along lower Cow Creek. That

is a token gesture which, while appreciated, ignores all the other locations where permitted cattle are degrading Coho CH within the Beaver Creek watershed. In contrast, FS managers should use this planning and decision making process to:
[bull] Identify locations where cattle have accessed Coho CH and assess impacts. This should be done not just on the East Beaver Allotment but also on the Dry Lake and Horse Creek Allotments within which Coho CH is also being degraded as a result of poorly managed grazing.
[bull] Identify what actions/changes in management that will be effective in preventing degradation of Coho CH

As shown on the Draft EA[rsquo]s [ldquo]Fire and Corrals[rdquo] map, two of the corrals on the East Beaver Allotment
are adjacent to Coho CH. That invites the degradation of Coho CH. These two coral facilities need to be removed to locations significant distance upslope of Coho CH.

Recommendation: To prevent degradation of Coho CH and [ldquo]take[rdquo] of Coho in violation of the ESA, either fence all locations where cattle have accessed Coho CH in order to eliminate access and the resulting CH degradation and Coho [ldquo]take[rdquo] or close the allotment. If grazing continues, relocate all livestock gathering facilities at least [frac12] mile upslope of Coho CH.

5. Riparian and Willow Wetland Degradation including sedimentation, shade removal and destruction of Willow Flycatcher (WIFL) breeding habitat.

[bull] Studies indicate that cattle spend roughly half of their time in riparian areas and 40% of diet is hydric plants. The Mid-Klamath section that includes Beaver Creek is listed as nutrient and temperature impaired. Beaver Creek is specifically also listed as sediment impaired. Therefore, the EA should assess and the decision must specify how riparian access, shade removal and bank trampling by livestock will be prevented/adequately controlled.
[bull] To assess riparian impacts, the decision should implement MIM riparian monitoring on main stems and in major Beaver tributaries. Establish 10% bank disturbance and 10% riparian woody utilization as triggering management changes to reduce trampling and the resulting sedimentation and to prevent elevation of stream water temperature.
[bull] Long-term California allotment monitoring by FS and UC Range indicates that modern grazing methods, including regular herding and rest-rotation grazing are needed to control livestock impacts to riparian areas. The EA must assess the need for regular herding and rest-rotation grazing and the decision must specify adequate implementation to prevent or limit bank trampling and shade removal.

6. The Noxious Weed Assessment is inadequate because it relies on data which is too old. Surveys need to be completed to properly inform the EA and decision in relationship to this issue. The Project can take specialists to locations within the project and cattle trespass locations where noxious weeds that were likely introduced by cattle, not hikers or OHVs, are present and sometimes rampant. Grazing Reform Project volunteers are ready to assist with noxious weed surveys upon request from FS managers or specialists.

7. The Draft Environmental Assessment and related specialist reports are significantly deficient and therefore they can not serve as an adequate basis for decision making. The most glaring deficiencies misinterpret or do not mention the best available science applicable to key issue and past management failures on the allotments FS managers seek to reauthorize. Most importantly, these documents do not include analysis sufficient to support an informed decision on whether or not FS managers should reauthorize the three grazing allotments. Lack of analysis of existing and

long-standing management problems and issues also makes it impossible to define management changes that will be effective at eliminating or even significantly mitigating the long-standing management problems associated with the three grazing allotments proposed for reauthorization.

Deficiencies in the Draft EA and related specialist reports include but are not limited to:

? The Draft EA and botany reports do bot adequately analyze the impact to key plants for pollinators. In this respect please consider [ldquo] Best Management Practices for Pollinators on Western Rangelands[rdquo] at this link: https://xerces.org/sites/default/files/2019-09/18-015_BMPs%20for%20Polls%20on%20Western%20Rangelands_sml_9-12-2019%20%281%29.pdf

? Neither the Draft EA nor the Wildlife Ba/BE disclose that Willow Flycatcher is a management indicator species for the KNF, that the KNF Forest Plan (LRMP) requires monitoring of Willow Flycatcher breeding habitat and that the KNF has failed to perform any of the LRMP-required breeding ground surveys. Those surveys should have been completed in the Project Area to inform this EA and the BE/BA because the vast preponderance of scientific studies (which are not cited in either document) clearly indicate that cattle grazing disrupts and ordinarily eliminates/destroys nests and nesting habitat resulting in local extirpation. In fact, The Project has monitored to protocol for breeding WIFL on several KNF allotments and outside allotments. We[rsquo]ve found WIFL in suitable habitat outside allotments but never within a KNF grazing allotment. Our examination of willow stands on the East Beaver and other allotments indicates that fragmentation via cattle trails has destroyed the breeding habitat which is dense willows within five feet of the ground in large, contiguous willow stands. We believe grazing has cumulatively destroyed WIFL breeding habitat and that breeding WIFL have been locally extirpated as a result of poorly managed grazing on the East Beaver and probably all KNF grazing allotments.

The BA/BEs reliance on 1940s aerial photos to conclude that WIFL habitat has not been reduced is an error. First of all grazing had already been occurring for several decades when those photos were taken; therefore, alteration and unnatural habitat reduction was already advanced. More importantly, the photos can not reveal the condition of WIFL breeding habitat which is within five feet of the ground; actual on-the-ground surveys are needed to assess the condition of WIFL breeding habitat which is a Management Indicator Species which has been ignored by FS KNF managers and which continues to be ignored in the BA/BE and EA.

An informed decision can not be made until WIFL breeding habitat and the likely local extirpation of WIFL as a result of poorly managed livestock grazing is properly assessed and disclosed.

? Neither the Wildlife BA nor the Draft EA disclose or analyze the scope of the cattle trespass problem: On Page 12 the Wildlife BA states that [ldquo]some incidental drift occurs from the Klamath National Forest[rsquo]s Oak Knoll Range project area onto the Rogue River-Siskiyou National Forest.[rdquo] In fact, records indicate that the trespass is significant in number of cattle, duration of the trespass (days per year) and that the problem has occurred for decades. The cumulative impact of many years of significant trespass on affected species is thus not assessed/ ignored. Theretofore the BA and EA are not adequate for decision making. In addition, trepass cattle have not been [ldquo]promptly removed[rdquo] as claimed. FS managers have failed to monitor for drift on a weekly basis and as a result trespass has often persisted for weeks if not months.
Furthermore, permit holders have not responded quickly when informed of trespass but have dragged their feet and taken days to get the cattle removed. Finally, permit holders have not removed trespass cattle far enough from the trespass sites. The Grazing Reform Project has documented several instances of trespass cattle returning to the same trespass sites within a day or two after they were removed.

Because the intensity, scope and duration of the cattle trespass has not been disclosed, the Wildlife BA and Draft EA are inadequate for decision making.

? On Page 6 the EA asserts that [ldquo]Livestock would be moved from forage areas (or the allotments, when all pasture units have reached allowable use standards) when they reach allowable use standards on herbaceous or woody vegetation (whichever comes first).[rdquo] The asserted management action, that is, moving livestock when forage utilization standards are met or exceeded, is not going to happen and the KNF[rsquo]s FS managers know it. These managers know that the KNF grazing program
is not staffed at a level that makes possible in-season forage, riparian and woody utilization monitoring. Indeed, current FS staffing is not sufficient to allow staff to perform all the pre-grazing range readiness checks or to sufficiently monitor riparian and woody utilization after the grazing season and before snow and/or the layoff of seasonal range staff makes such monitoring impossible. Therefore, managers are proposing to reauthorize
these grazing allotments based on a fiction. Just as is the case for [ldquo]adaptive management[rdquo] managers
seek to justify reauthorization of grazing based on design and management components which they know very well are fictions. This sort of cynical behavior by managers is precisely why the public does not trust FS managers to do the right thing.

? The [ldquo]Monitoring Strategy[rdquo] (Draft EA page 8) is insufficient. For one thing it does not implement MIM or any riparian monitoring on the Hornbrook and Ash Creek Allotments. It also does not properly and fully implement MIM riparian monitoring within Beaver Creek, the East Beaver Allotment. The MIM Protocol requires at least one MIM site on the most sensitive and grazing impacted section of each major stream within the allotment. KNF managers, however, have only established two MIM site within the entire Beaver Creek watershed even though there are five major Beaver Creek tributaries which have sensitive, grazing impacted riparian areas.

The Monitoring Strategy also fails to consider significant information from long-term meadow monitoring on California[rsquo]s national forest grazing allotments conducted by UC Rangelands under contract with the FS. Long term meadow monitoring shows a progressive loss of [ldquo]wetland obligate plants[rdquo] which is an indication that wetlands are being degraded and destroyed as a result of grazing. The specific peer reviewed science paper that includes the loss of wetland obligate plants is available at this link: https://link.springer.com/article/10.1007%2Fs00267- 017-0897-1

During our ten years monitoring dozens of Northern California[rsquo]s national forest grazing allotments, the Project has documented many instances where headwater wetlands, and in particular willow wetlands, have been and continue to be degraded as a result of poorly managed livestock grazing. Over time these willow wetlands are being converted into grasslands as water tables are lowered via livestock trampling by poorly managed cattle.

One of the areas where this process is most advanced is the Upper Silver Creek Basin which is one of the areas where cattle trespass from the KNF has been ongoing and severe. Based on the scientific literature and the rofessional hydrologist repport we commissioned, we conclude that the degradation and destruction of headwater wetlands via livestock trampling on the allotments proposed for reauthorization has reduced baseflow in streams issuing from the headwater basins which negatively impacts aquatic resources including SEA-listed SONC Coho Salmon.

Recommendation: The final EA should disclose and consider long-term NF meadow monitoring findings published by UC Rangelands. The final EA should present the condition of headwater basin wetlands

within the Project Area and in particular how significantly these wetlands have been degraded via livestock grazing. The Decision Document should commit to MIM Riparian monitoring to protocol, that is, with monitoring sites on all major streams within the Project Area. Streams impacted by the proposed grazing reauthorization provide cold water refugia at their mouths which are important to Klamath River Salmon.

Recommendation: Because long term monitoring has documented the progressive loss of wetland obligate plans within California NF grazing allotments indicating a progressive loss and degradation of wetlands, KNF managers should implement wetland monitoring, including
National Core Wetland BMPs, as part of any decision to reauthorize grazing, including the decision on this project.

? On page 18-19 the EA reports the results of MIM monitoring at the Cow Creek MIM since 2014. Streambank alteration has been measured at 11%, 13% and 12%. Beaver Creek is sediment impaired and this level of bank disturbance violates the Clean Water Act (CWA) by violating Basin Plan TMDL Implementation Plans and related sediment requirements. These levels of impact are unacceptable. Within Sierra Nevada National Forests, where grazing is similarly focused on headwater basins, a maximum bank disturbance rate of 10% has been adopted based on top-notch ecological assessments.

Woody Species Use has been measured at this site at 10%, 22% and 10%. 10% and greater woody species utilization indicates significant removal of shade resulting in increased water temperatures in salmon streams below. That contributes to the Klamath River's temperature impairment and fails to comply with the Basin Plan[rsquo]s TMDL Implementation requirements.

Recommendation: The final EA should consider and directly address applicable CWA requirements contained in the North Coast Basin Plan and detail options for compliance by the three grazing allotments proposed for reauthorization. The Decision document should disclose how it will comply with applicable Basin Plan requirements.

? The EA does not disclose the long history of cattle trespass. It only reports trespass going back to 2011. However, we have seen Rogue-River Siskiyou NF documents reporting trespass going back several decades. Because it does not disclose or analyze the full extent, severity and duration of the trespass problem, the Draft EA can not serve as an adequate basis for the decision to be made. As noted elsewhere in this comment, the EA also does not acknowledge that cattle from the KNF[rsquo]s Horse Creek and Dry Lake Allotments are also involved in trespass, including trespass into some of the same basins where East Beaver Allotment cattle trespass. Indeed, trespass by Dry Lake and Horse Creek Allotment cattle into Alex Hole is one of the most severe, long-standing and controversial of KNF cattle trespass problems.

? Table 11 on page 28 of the Draft EA summarizes [ldquo]Rogue River-Siskiyou National Forest Nested Frequency plot monitoring data from 2009-2016[rdquo] which is summarized from Rogue River-Siskiyou National Forest monitoring reports. The data however, has significant gaps and is incomplete, including no data for the upper Silver Fork Basin which is one of the areas the Project has documented as significantly degraded as a result of overgrazing related to cattle trespass. Because of the lack of this and other critical data, the Draft EA is incomplete; its conclusions about impacts, especially impacts associated with trespass, riparian-wetland grazing, fisheries and botanical impacts are unreliable and can not serve as an adequate basis for decision making.

For additional Draft EA and specialist report deficiencies please refer to comments submitted by the Oregon Office of the Klamath Forest Alliance in association with local organizations based in the Applegate River Basin.

8. The EA attempts to cover its inadequacies by proposing [ldquo]adaptive management[rdquo] but the KNF does
not have the staffing capacity to effectively and properly implement adaptive grazing management and managers have not taken steps to increase staffing to secure that capacity. For this reason, the invocation of [ldquo]adaptive management[rdquo] is cynical and meaningless.

FS managers have taken no action to increase grazing staff on this district and have no intention of doing so. The Project has documented that staff currently visit these allotments to put up and take down exclusion electric fencing on a few wetlands, for pre and post grazing monitoring, or when there are complaints. Even when there are complaints, staff often do not have time to go to the allotment to investigate and even when they do they do not have time to get to trespass locations far from roads or to follow-up. Often complaints for trespass only result in a call to the permit holder and no verification that trespass cattle were removed promptly or far enough from the trespass sites that they did not return immediately to locations they are not supposed to graze. The Project has documented that trespass cattle are habituated to trespass locations and that, when they are removed, they often return to trespass locations within a day or two.

Recommendation: If FS managers rely on Adaptive Management as part of decision making, they should commit in the decision document to providing sufficient staff to properly implement it.

Recommendation. Because there is great public controversy concerning grazing in general, and even greater controversy concerning grazing on the Siskiyou Crest and grazing in areas with Critical Habitat for Coho Salmon and because of the significant issues we an others have raised concerning the proposed action and the lack of adequate (or, in some cases, any) analysis of certain expected impacts, the EA should be withdrawn and an EIS process should be initiated which includes all the allotments with ongoing trespass onto the RR-SNF and ongoing degradation of Coho Critical Habitat.

Recommendations

Recommendations contained in the text above are repeated below so that those producing the Final EA and decision makes have them all easily at hand.

Recommendation 1: The Decision for this Project should eliminate spring grazing from the East Beaver Allotment and adjust its boundaries to exclude Coho CH. Spring grazing should be limited to the Ash Creek and Hornbrook Allotments and the number of cattle permitted to graze on East Beaver Allotment should be adjusted downward as a result.

Recommendation 2: Given the primacy of the climate issue and climate adaptation, this and all grazing decisions should mandate site specific best management practices for grazing allotments, utilizing the appropriate modern grazing management methods. In this respect, please consider the UN[rdquo] Special Report on Climate Change and Land[rdquo] at https://www.ipcc.ch/srccl/

Recommendation 3: The destruction of dry meadow bunchgrasses as a result of poorly managed grazing, and the resulting accelerated grazing pressure on riparian areas and wetlands can only be

reversed by resting the Siskiyou Crest Area for at least a decade. The Oak Knoll Grazing decision should implement a decade long [ldquo]Rest for the Crest[rdquo] from all grazing.

Recommendation 3: If grazing on the East Beaver Allotment is reauthorized, the Decision should

include timely adoption of site specific BMPs, including a mandated and specific rest rotation grazing schedule designed to prevent cattle from accessing the Crest Area too early in the season and from accessing Coho Critical Habitat at any time. Managers should also request staffing adequate to monitor and enforce implementation of the rest-rotation grazing schedule. As UC Rangelands/FS long-term monitoring clearly indicate, failure to order adequate rest-rotation herding and failure to adequately monitor and enforce rest-rotation implementation will result in loss of wetland habitat and water quality degradation in violation of applicable standards.

Recommendation 4: To prevent degradation of Coho CH and [ldquo]take[rdquo] of coho in violation of the ESA, either fence all locations where cattle have accessed Coho CH in order to eliminate access and the resulting CH degradation and Coho [ldquo]take[rdquo] or close the allotment. If grazing continues, relocate all livestock gathering facilities at least [frac12] mile upslope of Coho CH.

Recommendation 5: The final EA should disclose and consider long-term NF meadow monitoring findings published by or linked to at the UC Rangelands website. The final EA should present the condition of headwater basin wetlands within the Project Area and in particular how significantly these wetlands have been degraded via livestock grazing. The Decision Document should commit to MIM riparian monitoring to protocol, that is, with monitoring sites on all major streams within the Project Area. Streams impacted by the proposed grazing reauthorization provide cold water refugia at their mouths which are critical to Klamath River Salmon.

Recommendation 6: Because long term monitoring has documented the progressive loss of wetland obligate plants within California NF grazing allotments indicating a progressive loss and degradation of wetlands, KNF managers should implement wetland monitoring, including National Core Wetland BMPs, as part of any decision to reauthorize grazing, including the decision on this project.

Recommendation 7: The final EA should consider and directly address applicable Clean Water Act requirements contained in the North Coast Basin Plan and detail options for compliance by the three grazing allotments proposed for reauthorization. The Decision document should disclose how it will comply with applicable Basin Plan requirements.

Recommendation 8: If FS managers rely on Adaptive Management as part of decision making, they should commit in the decision document to providing sufficient staff to properly implement it.

Recommendation 9: Because there is great public controversy concerning grazing in general, and even greater controversy concerning grazing on the Siskiyou Crest and grazing in areas with Critical Habitat for Coho Salmon and because of the significant issues we an others have raised concerning the proposed action and the lack of adequate (or, in some cases, any) analysis of certain expected impacts, the EA should be withdrawn and an EIS process should be initiated which includes all the allotments with ongoing trespass onto the RR-SNF and ongoing degradation of Coho Critical Habitat.

Summary and Conclusion: A call for collaboration

As detailed above, the Draft EA and associated specialist reports contain errors and omission which render them inadequate as a basis for the Decision to be made. Moreover, the scope of analysis and decision making is not congruent with the scope of the cattle trespass problem and, as a result, can not serve as a basis for decisions that will resolve the ongoing trespass. Because it does not address the full scope of the trespass and Critical Habitat gradation issues, the Draft EA is an irresponsible waste of taxpayer money and reflects bad judgment by decision makers. Moreover, the propriety and legality of combining scoping and comment on the Draft EA is questionable.

The scope of the Siskiyou Crest Livestock Trespass Issue includes the KNF[rsquo]s Horse Creek, Dry Lake and East Beaver Grazing Allotments. That is also the scope of the issue of grazing livestock accessing and degrading the Critical Habitat of ESA-listed Coho Salmon and the issue of cattle-caused degradation of the Siskiyou Crest and its headwater basins. In order to actually and effectively address these contentious and controversial issues, and to resolve both the trespass and Critical Habitat degradation problems, KNF managers should abandon this flawed Draft EA and decision making process and prepare an EIS that applies to the Horse Creek, Dry Lake and East Beaver Allotments.

That EIS and decision making process should be pursued in a collaborative manner which brings together the grazing permit holders, the Grazing Reform Project, other interested local/regional organizations, county and tribal governments to work together for long-term solutions that all of us can support. All-party collaboration may be the only way to resolve conflict and controversy over management of the Siskiyou Crest. These are public lands; Forest Service managers should embrace and implement a collaborative process to involve and include all the public in their management.

Please keep us informed of all developments related to the proposed action.