

April 22, 2021

To: Shane Jeffries

Forest Supervisor

Ochoco National Forest

From: Chris Paulson

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RE: Objection to the Proposed Draft Decision Notice for the Sunflower Allotment Management Plan (AMP)

I would respectfully request that you review both my **Comments on the Sunflower Grazing Reauthorization and Wildlife Habitat Improvement Project—Draft Environmental Analysis** (12-20-2020) and **Comments on the Sunflower Project Area Proposals** (11-18-2019). My objection to the Sunflower Allotment Management Plan (AMP) is rooted in the failure of the Forest Service to adequately and satisfactorily address the issues raised in my previous correspondence in the final Environmental Assessment (EA) for the project.

## Wildlife Habitat Improvement Projects:

The proposed closure of Forest Road 550 is unwarranted. The Environmental Assessment (EA) for this project does not provide any evidence that terminating over a century of public use of this road would result in any specific benefit for wildlife. The EA also completely ignored the historic role this alignment played in the homesteading of the Hardscrabble-Sunflower area and the Federal Grazing Permit Program; which came into being after the government intervention in the Oregon Sheepshooters' War.

The closure of Forest Road 550 would require me to rely on Forest Road 100 as the only alternative route available to access my Columbus Creek in-holding property. This route has sloughing fill and cut slopes and an actively eroding road prism with steep pitches that are hazardous in inclemental weather. Forest Road 100's fundamental design, location and condition makes this road significantly less stable and safe to travel than the ridge-line alignment of Forest Road 550. The EA completely ignored the consequences and issues of eliminating vehicular travel over Forest Road 550, which is the long-standing Forest Service documented access to my in-holding. Forest Road 550 should remain open to public vehicular travel.

## Sunflower Grazing Reauthorization:

The EA does not establish the statistical justification for using the employed field data across the Project Area. The number of sample plots in the Project Area are inadequate in number and have not been subjected to a consistent validating protocol. With over a hundred years of grazing history, it is also disappointing that the Forest Service has so few aged permanent plots and study areas in the Project Area. The inadequacies of the field measurements used in the EA have resulted in a flawed determination that allows for too many cows, too few pasture rest periods, and inadequate remedial actions to address the extensive environmental impairments that exists in the Project Area.

The Best Management Practices outlined in the EA provide a sound approach to managing the grazing activities in the Project Area. However, without a detailed Administrative Compliance Plan (ACP) in the EA, the stakeholders do not have a means of measuring the level of enforcement commitment that these practices will receive from the Agency. The EA should be amended to include a detailed ACP.

Discoloration and septic odor from cattle excrement is commonplace in the stream courses and riparian zones throughout the Project Area. The objectives and commitments to the public regarding water quality in the Forest Plan cannot simply be delegated to the Oregon Department of Environmental Quality. The Forest Service has the ultimate responsibility to meet the water quality obligations stipulated in the Forest Plan. In light of commonly occurring fecal contamination by cattle in the stream courses and riparian zones in the Project Area, a water quality sampling regimen should be included in the EA to insure that the Forest Service is meeting its obligations as set forth in the Forest Plan.

The riparian zones and stream courses in the Project Area are severely impaired from the historic grazing practices. Exclusion barriers and pasture rest periods are the only effective means reasonably available to protect and to begin to rehabilitate these damage sites. The EA fails to adequately recognize the current conditions of these sites and to prescribe sufficient protections for them. It also fails to consider low impact stock management tools, such as temporary electrical fencing and vegetative barriers as a means to prevent further degradation of these fragile areas.

I urge you to postpone the final decision on the Sunflower Allotment Management Plan (AMP) and invest time this summer walking the drainages in the Project Area with your key leadership and a credentialed hydrologist. I believe that an objective boots-on-the-ground field review will lead you to the determination that implementing the AMP, based on the currently written EA, will fall far short of achieving the objectives and commitments in the Forest Plan.

Thank you for considering my Objection to the Proposed Draft Decision Notice for the Sunflower Allotment Management Plan (SAMP)

Sincerely  
Chris Paulson

CC: Johanna Kovarik  
Jacob Young