

**OBJECTOR'S NOTICE OF OBJECTION, STATEMENT OF ISSUES AND LAWS,
AND REQUESTED REMEDIES**

NOTICE OF OBJECTION

April 10th, 2021

Shane Jeffries, Forest Supervisor
Ochoco National Forest
3160 NE Third Street
Prineville, OR 97754

RE: Blue Mountains Biodiversity Project's objection to the Sunflower Grazing Reauthorization and Wildlife Habitat Improvement Project Draft Decision Notice and Finding of No Significant Impact and Environmental Assessment

Dear Objection Reviewing Officer,

Blue Mountains Biodiversity Project (BMBP) hereby formally submits the following objections to the Ochoco National Forest's Sunflower Grazing Reauthorization and Wildlife Habitat Improvement Project (aka "Sunflower Grazing Reauthorization") Environmental Assessment and Draft Decision Notice and Finding of No Significant Impact. BMBP has secured the right to submit objections and thereby participate in the pre-decisional administrative review process for this project. BMBP has submitted timely written scoping comments regarding this project and extensive comments on the Draft Environmental Assessment, including field survey sheets and photographs from our surveying the affected area. ** See attached.*

Decision Document

Sunflower Grazing Reauthorization and Wildlife Habitat Improvement Project Environmental Assessment and Draft Decision Notice and Finding of No Significant Impact

Date Decision published

March 12th, 2021

Responsible Official

Shane Jeffries, Forest Supervisor, Ochoco National Forest

Description of the Project

The Ochoco National Forest Service has selected in its entirety the Proposed Action, including the following proposed management actions. Therefore, this objection focuses on the Proposed Action, as specified in the Draft Decision Notice. The Decision is summarized as follows:

"Table 1 summarizes management activities of the Proposed Action [on p. 3 of the Draft Decision Notice]. Activities proposed generally include reauthorization of grazing, changes in numbers of pastures, changes in livestock management requirements (i.e. grazing rotation, timing of grazing), construction or reconstruction of rangeland improvements, planting of riparian hardwoods, felling trees into and along stream channels and stream restoration activities, including head-cut repair. Also, wildlife

habitat improvements of road closures and conifer thinning would occur. Appendix A contains the Resource Protection Measures (RPM), design elements, and monitoring described in the Final EA, while Appendix B contains maps of the spatial locations of the management activities and actions.” (Draft Decision Notice, pp. 2-3)

The following are specific management actions to be taken under the Proposed Action that are specified in Table 1 that we find to be excessive regarding potential negative impacts to the ecosystem, wildlife, soils, riparian functioning, hydrologic flows, and/or water quality or that are both excessive management and very costly, considering the already very degraded conditions and increasing climate change inevitably making these allotments even more unsuitable and unsustainable for continued cattle grazing: providing forage at the current rate; high allowed numbers of AUMS and cow/calf pairs of up to 200 cow/calf pairs (now averaging 120), up to 800 cow/calf pairs (now averaging 600 pairs), and 563 cow/calf pairs (now averaging 400 pairs) for the three allotments; long allowed seasons of cattle grazing use up to April 15th or May 1st all the way to October 31st although current season target or average seasons of use are usually shorter (May 15 or June 1st to August 15th to September 15th, likely due to lack of enough forage by early fall, as we witnessed in early September); 106 planned water developments; 61.5 miles of new fencing; and approximately 1,966 acres of thinning out juniper up to 20.9” dbh with fir and pine to be thinned at less than 12” dbh. Not included in Table 1 is planned leaving of livestock ponds in their current condition that are currently directly blocking stream channels and blocking natural stream flows, which we also oppose.

Location

The project area is located on the Paulina Ranger District of the Ochoco National Forest (ONF), approximately 17 miles northeast of Paulina, Oregon, along the eastern edge of the ONF. The project area encompasses three grazing allotments (Dry Corner, Sunflower, and Wind Creek) covering 51,530 acres of National Forest System Lands.

Appellant’s Interests

Blue Mountains Biodiversity Project has a specific interest in this decision, which has been expressed through participation throughout the NEPA process. BMBP supporters visit much of the affected area for hiking; camping; relaxing; bird, wildlife, and wild flower viewing; photography; hunting; and more. The value of the activities engaged in by BMBP volunteers, supporters, and staff would be damaged by the implementation of this project.

BMBP is a non-profit organization that works to protect Eastern Oregon National Forests. Staff, volunteers, and supporters of BMBP live in various communities surrounding the Ochoco National Forest and use and enjoy the Forest extensively for camping; hiking; drinking water; hunting; fishing; general aesthetic enjoyment; gatherings; viewing flora and fauna; gathering forest products; and other purposes, such as solar eclipse viewing.

Request for meeting

BMBP requests a meeting with the Forest Service to discuss matters in this objection and seek resolution of concerns through negotiation before the Ochoco Forest Service makes a final decision on the Sunflower Grazing Reauthorization and Wildlife Habitat Improvement Project (aka the Sunflower Grazing Reauthorization Project).

Specific issues addressed in this objection

NEPA (National Environmental Policy Act) violations, including: proposing actions inconsistent with achieving the stated purpose and need for the project; failure to provide an adequate range of alternatives; failure to adequately analyze direct, indirect, and cumulative impacts of the project; inaccurate use of the science; failure to disclose the methodology used; and planning large scale conifer thinning outside the scope of allotment renewal without adequate analysis of effects.

Violations of the National Forest Management Act (NFMA) and the Ochoco Forest Plan, including failure to provide for population viability for multiple Management Indicator species and other wildlife species and violations of the Ochoco Forest Plan, as well as relying on a very outdated Forest Plan to justify allotment grazing reauthorization .

Potential violations of the Ochoco National Forest Plan include not updating suitability assessment for livestock grazing under current science and conditions; failing to adequately consider and uphold other multiple use values under the Forest Plan other than livestock grazing; and violations of Forest Plan standards, including INFISH/PACFISH requirements and Northern goshawk protections under the Eastside Screens; and violations of Forest Plan standards for avoiding detrimental impacts to soils and ensuring that permittees meet grazing standards, including stubble heights.

Endangered Species Act violations include contributing to a trend toward federal uplisting for the following species: Threatened-listed Gray wolf; Threatened-listed Mid-Columbia steelhead trout; Sensitive Columbia Spotted frog; Sensitive Redband trout; and various Sensitive-listed wildlife species and plants known to be or suspected to be within the project area.

Potential Clean Water Act violations include failure to ensure water quality and water flows in streams, springs, and areas with livestock ponds.

We also express concerns regarding potential violation of adequate prevention measures for preventing invasive plant introduction and dispersal under the Region 6 invasive plant management plan, the excessive public costs of the many developments planned to enable current and future unsustainable livestock use of the area, and foreseeable impacts to climate stability.

BMBP objects to the Sunflower allotments grazing reauthorization for the following reasons:

I. The Sunflower Grazing Reauthorization Project violates the National Environmental Policy Act

The Sunflower Grazing Reauthorization project violates the National Environmental Policy Act in the following ways: inconsistency with the stated “purpose and need” of the project; failure to provide an adequate range of alternatives; failure to adequately analyze direct, indirect, and cumulative impacts of the project; failure to take the requisite “hard look” at project impacts required by NEPA; inaccurate use of the science; and failure to disclose methodology for key analysis assumptions; and proposing large scale thinning outside the scope of grazing reauthorization without adequate analysis of potential effects.

Inconsistency with the stated purpose and need of the project

The Sunflower Grazing Reauthorization project (aka Sunflower project) is not consistent with all the purpose and need goals as expressed in the Environmental Assessment. The Sunflower project includes the following statement that constitutes the purpose and need for the Sunflower Grazing Reauthorization project in the Environmental Assessment (EA) page 3:

“Grazing....

The purpose of NEPA review and evaluation of livestock grazing reauthorization in the Sunflower Cluster is to meet the stipulations of the Recission Act (1995) and ensure livestock grazing would be

managed in a manner that maintains or moves National Forest grazing allotments towards the objectives, desired conditions, and standards and guidelines identified in the Ochoco National Forest Land and Resource Management Plan (Forest Plan).

Review and evaluation of livestock grazing on the Sunflower Cluster allotment is needed because:

- *Where consistent with other multiple use goals and objectives, Congressional intent is to allow grazing on suitable lands....

- *National Forest lands within the Sunflower Cluster are identified as suitable for domestic livestock grazing in the Forest Plan and continued domestic livestock grazing is consistent with the goals and objectives of the Forest Plan.

- *It is Forest Service policy to make forage available to qualified livestock operators from lands suitable for grazing consistent with the Forest Plan....

- *It is Forest Service policy to contribute to the economic and social well-being of people by providing opportunities for economic diversity and promoting stability in communities that depend on range resources for their livelihood....

Wildlife Habitat Improvement: Thinning and Road Closures

...The proposed road closures, conifer thinning and riparian restoration activities in the Sunflower project area are needed to:

- *Address the increase in conifer (primarily juniper) encroachment to restore/improve the native bunchgrass and shrub understories;

- *Promote elk and deer distribution on their seasonal ranges on National Forest System lands and reduce impacts to adjacent private lands where they damage crops and pastures and limit the State's ability to manage populations;

- *Restore/improve the native bunchgrass and shrub communities;

- *Provide more secure calving and fawning habitat for elk and deer;

- *Reduce sediment delivery into tributaries leading to critical steelhead habitat; and

- *Provide an economically sustainable transportation system.

(from the final Environment Assessment for the Sunflower project, pp. 3-4)

The need for action should be based on current habitat conditions within the project area, which we field-surveyed and documented in our survey sheets and photographs, incorporating our field survey sheets and photographs of conditions on the ground as part of our comments. Comments are quoted and cited below based on the page number of our typed comments on the EA where they can be found.

Examples of our comments on the inconsistency of proposed management actions with the stated purpose and need for the Sunflower Grazing Reauthorization project, regarding encouraging the continued grazing of livestock at current levels not being consistent with: promoting stability in communities that depend on range resources for their livelihood; promoting elk and deer distribution and reducing impacts to adjacent private lands; reducing fine sediment delivery to streams; improving wildlife habitat in general; and regarding reduction of dense small trees over time, as cattle over-grazing promotes the dense in-growth of small young trees by eliminating competition with the trees from higher, denser grasses and shrubs:

"Encouraging the continued grazing of livestock on very marginal and degraded grasslands, when creeks are drying up is not "promoting stability in communities that depend on range resources." (EA p. 5) This is especially true with the foreseeable advent of more high temperatures and droughts and more intense wild fires under escalating climate change. Yet the Forest Service fails to analyze climate change effects and their interactions with the existing situation of severe extensive over-grazing, long-term riparian

damage, and evidence of what were probably historically perennial creeks drying up. If the cumulative effects of climate change and continued livestock grazing in this area were analyzed in depth, there would be a clear indication that continued livestock grazing authorization is not advisable. Local ranchers are bound to face more and more cut-backs in the grazing season and numbers of cattle that can be supported and other limiting grazing requirements under adaptive management due to increased loss of forage to drought and fires and lack of sufficient water due to drought, high temperatures, and the continued high demand on water by the cattle. This situation can lead to increasing economic loss to the ranchers and eventual abandonment of the allotments, at which point the existing riparian area destruction, loss of plant diversity and abundance, soil impacts, and stress on wildlife populations will be even more intense and much harder to recover and restore.” (BMBP comments p. 4, last par. & par. 1, p.5)

“Elk and deer would be far better distributed on these allotment areas if they had enough to eat. It’s no wonder that we were not seeing elk or deer or even much sign of elk (none) or deer use (few tracks) because there is not enough forage left for them due to the excessive cattle consumption of already marginal available forage. Cattle are at least as big a factor in poor deer and elk distribution and excessive fine sediment loading in streams as roads, if not more.” (BMBP Comments, p. 5, par. 2)

“Continued livestock grazing in these allotments would be contrary to, and not compatible with wildlife habitat improvement, as the ecological destruction from cattle is too severe and entrenched to be remedied by the proposed alternative.” (BMBP Comments, p. 9, 1st par.)

“So much proposed tree felling up to 20.9” dbh cannot be explained by a goal of increasing forage for cattle—especially as livestock over-grazing creates the conditions for dense young tree growth, so such growth would likely re-grow if the grazing pressure isn’t discontinued completely. There are clearly too many cattle in the allotments over too long a season still planned.” (BMBP Comments, p. 16, last full par.)

Resolution

BMBP has commented on its objection to the Ochoco National Forest’s (ONF) Sunflower Grazing Reauthorization project in comments (see quotes and citations above.)

We request that, to be consistent with the purpose and need for the project, conditions on the ground, and restoration goals, that the Forest Service:

*Re-plan and re-write the proposed action to be consistent with the purpose and need stated for the project in a new Environmental Assessment or Environmental Impact Statement or choose a modified alternative that is consistent with the stated purpose and need for the project as follows: not permitting grazing re-authorization or significantly reducing cattle numbers to sustainable levels for the land and requiring a shorter grazing season which avoids the early Spring reproductive season of April and May and prohibits fall grazing beyond September. These measures would allow for greater ranching community stability and for more available forage for elk and deer to help with their distribution. Such a modified alternative should also include needed active riparian restoration and exclusion of cattle from perennial creeks and intermittent stream sections that are damaged and not meeting riparian management objectives.

Failure to provide an adequate range of alternatives

The Sunflower Grazing Reauthorization Environmental Assessment included an inadequate range of alternatives.

Our related comments explain our position and include the following:

"The Forest Service is obviously not considering and analyzing in depth a full range of alternatives when both the No Action alternative alone and the Proposed Action alternative alone are only expected to improve upland plant vigor 'slowly' and over an unspecified 'long' term. Riparian plant conditions are expected 'to improve at a more accelerated rate than alternative 2' through the No Action alternative—i.e. from removing all cattle after two years. Yet riparian functioning in the most damaged creeks would likely be slower without some active restoration, so the obvious solution would be to combine cessation of livestock grazing after the required two years with proposed active riparian restoration such as needed head-cut repair, wood placement to stabilize stream channels, and riparian hardwood planting, as well as closing road segments damaging RHCAs. This would be the environmentally preferred alternative." (BMBP Comments, pp. 9-10)

"Following is a summary of some of our key concerns about the proposed action and reasons to support either the No Action alternative 1 or a modified alternative we are suggesting that would phase out livestock grazing over two years as with No Action and include proposed active riparian restoration, but not the extensive conifer thinning planned unless it is reduced to the typical non-commercial size limit of 9" dbh and is done by hand only, with more limited scale based on specific criteria relating only to riparian area restoration.

- The No Action or a modified No Action/Active Riparian Restoration Only alternative would have far greater benefits for riparian recovery and for the viability and recovery of Threatened Mid-Columbia steelhead trout, Sensitive Redband trout, Sensitive Columbia spotted frog, and other aquatic life and riparian plant biodiversity than the proposed continuance of livestock grazing under Alternative 2 and would better meet Forest Plan standards, PACFISH/INFISH objectives, and Clean Water Act requirements. The Environmental Assessment analysis supports our contention that recovery of riparian areas would occur more quickly (and more completely) with no continued cattle grazing. This leads to the logical conclusion that existing fish populations of Redband trout and downstream Threatened Mid-Columbia Steelhead trout, Columbia Spotted frogs, and other aquatic life and riparian-associated Sensitive plants would be more likely to survive and would benefit more from either the No Action alternative, or better yet, our proposed modified alternative that incorporates both no reauthorization of the grazing permits plus the proposed riparian restoration activities planned for Alternative 2. Such a modified alternative is such an obvious solution to the existing riparian condition problems as an environmentally preferred alternative that the Forest Service should have thought of it, based on staff and public concerns, and proposed this as an alternative. The EA instead has an inadequate range of alternatives." (BMBP Comments, p. 1, par.s 2 & 3)

"It is easily foreseeable that proposed grazing management changes would not be sufficient, as there is so much long-term livestock damage to these creeks and the Forest Service is not proposing a definite reduction in cattle numbers, changes in the season of use, or keeping cattle completely out of the riparian areas." (BMBP Comment pp. 7-8)

"Beneficial effects rather than further impacts to Mid-Columbia Steelhead trout, Redband trout, and Columbia Spotted frog is another reason for our support for the No Action alternative or our suggested

“No grazing reauthorization plus riparian restoration” alternative over the Proposed Action alternative.” (BMBP Comment, p. 11, par. 3)

“The Forest Service is failing to provide a full range of alternatives, as the first two alternatives considered but eliminated from detailed study are viable alternatives in keeping with the purpose and need of improving upland and riparian conditions. Actually, an alternative that suggests dramatically reduced utilization is not covered by the proposed alternative as claimed. Alternative 2 proposes variable seasons of use without significantly reducing cattle numbers, and therefore not reducing overall utilization levels. It’s not at all clear that the proposed action would actually sufficiently reduce the season of use in riparian areas or other sensitive areas. This is perhaps the reason why the Forest Service characterized this as only “implied” by the analysis of the proposed action. The suggested reduction or elimination of the season of use in riparian and other sensitive areas is by no means guaranteed by the proposed action. Existing severely degraded riparian areas give reason for concern that there should be mandated reduction or elimination of the season of use in riparian areas or other sensitive areas to allow for their full recovery” (BMBP Comments, p. 9)

“We support the No Action/No Grazing alternative or No Action combined with Riparian Restoration Only as an alternative that does not reauthorize livestock grazing but still proposes needed active restoration for riparian areas. Decommissioning of livestock-related water developments and removal of fencing no longer needed could be included as part of our proposed modified alternative. The most destructive water developments and fencing could be prioritized for decommissioning if there is not enough current funding for immediate removal, with scheduling for removing defunct water developments and unnecessary fencing later. Road closures and decommissioning could also be included, although these are not usually planned for livestock grazing reauthorization and could be done separately. This alternative would not include non-commercial thinning without significant tree size and acreage reduction, confining it only to riparian restoration objectives, as discussed above. Such changes and limitations would turn this into a credible “Wildlife Habitat Improvement Project”, which could be the name of this proposed modified alternative. This new alternative would still provide local jobs.” (BMBP Comments, p.8)

Resolution

BMBP has commented on its objection to the ONF’s inadequate range of alternatives in the Sunflower Grazing Reauthorization Environmental Assessment and requested a broader range of alternatives in our comments. See our comments quoted and cited above.

To remedy this problem, the Forest Service would either have to reissue a new Environmental Impact Statement offering a full range of alternatives as required by NEPA for public review and comment, or better meet our concerns by choosing our modified alternative or the No Action alternative, as expressed in related comments as follow:

“We support the No Action/No Grazing alternative or No Action combined with Riparian Restoration Only as an alternative that does not reauthorize livestock grazing but still proposes needed active restoration for riparian areas. Decommissioning of livestock-related water developments and removal of fencing no longer needed could be included as part of our proposed modified alternative. The most destructive water developments and fencing could be prioritized for decommissioning if there is not enough current funding for immediate removal, with scheduling for removing defunct water

developments and unnecessary fencing later. Road closures and decommissioning could also be included, although these are not usually planned for livestock grazing reauthorization and could be done separately. This alternative would not include non-commercial thinning without significant tree size and acreage reduction, confining it only to riparian restoration objectives, as discussed above. Such changes and limitations would turn this into a credible “Wildlife Habitat Improvement Project”, which could be the name of this proposed modified alternative. This new alternative would still provide local jobs.” (BMBP Comments, p.8)

Failure to adequately analyze direct, indirect, and cumulative effects

The Sunflower Grazing Reauthorization Environmental Assessment demonstrates failure to adequately analyze environmental effects of the project in various parts of the document, including omissions and distortions such as the following addressed in our comments:

“The non-commercial thinning proposed sounds more like a subsidized hand-out to the allotment permittees to increase forage for cows than a justified wildlife habitat improvement. Such thinning is not likely to increase forage significantly under current grazing pressure. The proposed conifer negative thinning impacts to wildlife, carbon storage, and recreational values would need to be analyzed in depth. Non-commercial thinning up to only 9” dbh by hand only is much less damaging and less controversial than planning to thin up to 21” dbh, which is equivalent to a timber sale regarding the loss of live trees for wildlife, long-term snag and log habitat, recreational values, and carbon sequestration. Such foreseeable impacts need to be analyzed and avoided. We suggest limiting any non-commercial thinning to 9” dbh maximum, greatly scaling down the acreage on which this occurs by confining it to situations of meadow and riparian hardwood encroachment, and setting clear criteria for where, under what circumstances, at what degree of intensity, and why this would take place—or drop the non-commercial thinning with this project.” (BMBP Comments, p. 8, par. 4)

“It sounds like planned non-commercial thinning with tracked excavating equipment with booms would be likely to exceed the Forest Plan limit for detrimental soil impacts of 20% of an activity area when calculated combined with existing detrimental soil impacts. Further, [the] EA does not analyze in depth the effects of intensive thinning up to 20.9” dbh over larger areas for specific areas.” (BMBP Comments, p. 10, 4th par.)

“The Table 2 findings of continued adverse bank stability and fine sediment loading for the No Action alternative fails to account for mid to long-term benefits from plant regeneration on stream banks from no cattle grazing and passive recovery, which would gradually stabilize stream banks and reduce bank instability and fine sediment delivery. Cattle trampling around riparian areas causes bank instability and excess fine sediment loading in streams. No cattle use would also contribute to a better width to depth ration for stream channels and help reduce stream temperatures due to far less grazing and hedging of riparian hardwoods.” (BMBP Comments, p. 11, par. 3)

“Limit tree felling to only limited wood placement in stream channels and floodplains and limited non-commercial thinning only up to 9” dbh by hand, only where trees are encroaching on riparian hardwood habitat or moist meadows. There should be detailed analysis justifying any tree felling or non-commercial thinning. Just citing project design criteria is not enough for NEPA requirements or to allay our concerns.” (BMBP Comments, p. 15, last par.)

Re: inadequate cumulative effects analysis:

“Encouraging the continued grazing of livestock on very marginal and degraded grasslands, when creeks are drying up is not “promoting stability in communities that depend on range resources.” (EA p. 5) This is especially true with the foreseeable advent of more high temperatures and droughts and more intense wild fires under escalating climate change. Yet the Forest Service fails to analyze climate change effects and their interactions with the existing situation of severe extensive over-grazing, long-term riparian damage, and evidence of what were probably historically perennial creeks drying up. If the cumulative effects of climate change and continued livestock grazing in this area were analyzed in depth, there would be a clear indication that continued livestock grazing authorization is not advisable. Local ranchers are bound to face more and more cut-backs in the grazing season and numbers of cattle that can be supported and other limiting grazing requirements under adaptive management due to increased loss of forage to drought and fires and lack of sufficient water due to drought, high temperatures, and the continued high demand on water by the cattle. This situation can lead to increasing economic loss to the ranchers and eventual abandonment of the allotments, at which point the existing riparian area destruction, loss of plant diversity and abundance, soil impacts, and stress on wildlife populations will be even more intense and much harder to recover and restore.” (BMBP comments, pp. 4-5)

“The costs of new water developments, water development reconstruction, miles of new fencing, and active riparian restoration far outweigh any benefit to the ranchers. The public and the ecosystem bear the expense. These ecological expenses include continuing destruction of fish populations; and loss of: water retention; water and forage for wildlife; natural hydrologic and riparian functioning; plant diversity; and recreational and scenic values. Beyond all this, the cattle also contribute to the severity of climate change effects through both methane gas emissions and depletion of water, loss of water retention, and soil and plant impacts that decrease the viability of wildlife species. Elk also spend energy and lose otherwise suitable habitat by actively avoiding cattle.” (BMBP comments that specify ecological expenses/impacts not considered in any depth in the EA analysis, p. 7, 4th par.)

Resolution:

BMBP has commented on its objection to the ONF’s failure to adequately analyze direct, indirect, and cumulative effects of the Sunflower Grazing Reauthorization project on a range of receptors. See our comment quotations and citations in the paragraphs above regarding inadequate analysis.

To resolve this objection, an EIS needs to be prepared that adequately analyzes direct and indirect effects of the Sunflower Grazing Reauthorization project, and cumulative effects of the project in combination with past, ongoing, and reasonably foreseeable future actions to NEPA standards, with a public comment period to enable informed public comment and agency review.

Inaccurate use of the science

There are some instances in the Sunflower Grazing Reauthorization EA of analysis not reflecting the full range of best available science or using science inaccurately. Examples of failure to accurately using science from our comments:

“What exact field evidence studies support full recovery of streamside plants through cattle dispersal and riparian restoration without full exclusion fencing or reduction in numbers of livestock and shortening

the season of use? The benefits of no cattle use to both riparian and upland plant diversity are well documented for cattle exclusion and passive recovery. It is not clear (or discussed in the analysis) that cattle dispersal due to management actions proposed would come close at all to full riparian and upland recovery even in the long-term.” (BMBP comments, p. 11, 1st par.)

“It seems highly questionable to assume that potential for effects to infiltration rates and soil structure by such heavy animals with intensive grazing habits and tendency to congregate only occur during the growing season, not during the later summer dry season recurrent use of riparian areas and continued upland grazing. It is also dubious whether these effects ‘are relieved by freeze-thaw processes the following winter.’ This does not account for the legacy impacts of cattle trampling and compaction of soils from year to year and over decades compounding the intensity of impacts. This seems like a biased selection from the science and a misrepresentation of the science as a whole.” (BMBP Comments, p. 13, 1st par.)

Resolution

BMBP has commented on its objection to the ONF’s failure to use science accurately. See our comment citations and quotations in the paragraphs above.

In order for the Sunflower Grazing Reauthorization project to comply with NEPA, the Forest Service needs to use the science accurately, with professional integrity in analysis in a new EIS available for public comment. This would better and more accurately inform public comments, agency review, and decision-making.

II. The Sunflower Grazing Reauthorization project violates the National Forest Management Act

The Sunflower Grazing Reauthorization project violates the National Forest Management Act in the following ways: failure to ensure the viability of Management Indicator and other species, including Northern goshawk, failure to ensure current suitability of the allotment lands for continued livestock grazing, and potential violation of Forest Plan standards and guidelines for riparian area (RHCA) protection, grazing standards, and protection of soils through proposed actions. The Forest Plan requires adherence to INFISH requirements, including moving toward attainment of Riparian Management Objectives in forest areas, and protection guidance for the Northern goshawk under the Eastside Screens requirements.

Failure to ensure the viability of Management Indicator Species (MIS)

Our comments noted many areas of analysis in which the Sunflower Grazing Reauthorization EA failed to demonstrate that the viability of Management Indicator (MIS) and Sensitive species would be ensured with project implementation. Species of concern for protection of viability include the following Management Indicator species: Redband trout, and Rocky Mountain elk, as well as Northern goshawk, which has protection guidance under the Eastside Screens.

We are also concerned about failure to ensure viability of Sensitive and Threatened-listed species on the Forest, including Threatened-listed Gray wolf; Threatened-listed Mid-Columbia River steelhead trout; Sensitive-listed Wolverine; Sensitive Columbia Spotted frog, and Sensitive-listed Redband trout.

The Forest Service has legal responsibilities to protect the viability of Management Indicator species,

but not to reauthorize livestock grazing no matter what the cost to other values protected by the Forest Plan.

Examples of how our comments express these concerns regarding the failure to ensure the viability of Management Indicator and other species:

“The ‘Sunflower Grazing Reauthorization and Wildlife Habitat Improvement Project’ Environmental Assessment’s Proposed Action (alternative 2) would reauthorize cattle grazing on Ochoco National Forest public/treaty lands on the Paulina Ranger District despite widespread severe over-grazing and long-term riparian damage to creeks and springs from current and past livestock grazing. Continued cattle use would set back badly needed recovery of riparian areas, natural plant cover and diversity, and soil integrity and fertility. Continued cattle grazing of the allotments area, even with proposed adaptive management and limited riparian restoration, threatens the continued viability of the Sensitive Redband trout populations and Sensitive Columbia Spotted frogs, downstream Threatened Mid-Columbia Steelhead trout, and many Sensitive or declining bird species, including the Greater Sage Grouse, as well as harming meadow habitat for Sensitive native Bumblebee species and a Sensitive butterfly species. The planned continued grazing of 1,563 cow and calf pairs would still remove needed forage for native Mule deer, Rocky Mountain elk, and Pronghorn. The long grazing season, which the Forest Service does not promise to reduce, eliminates nutritious spring forage for wild ungulates and wild horses, summer forage, and late fall forage very important to deer and elk winter survival. Many Sensitive plants, especially riparian plants, would also be at risk from continued cattle grazing. Water quality and hydrologic flow recovery would also be significantly impeded by continued cattle grazing even with planned adaptive management and limited active riparian restoration.” (BMBP Comments, p. 1, par. 1)

3)“Based on the EA analysis, wildlife species that would be threatened by the proposed cattle grazing reauthorization (and some by the proposed extensive tree thinning up to 16-20.9” dbh) but would benefit from the No Action or modified No Action/Active riparian restoration alternative include: the Sensitive Greater Sage grouse; the Sensitive Silver-bordered Fritillary butterfly; the Sensitive Western bumble bee and the Morrison bumble bee; the Sensitive Fir Pinwheel snail; Management Indicator species Rocky Mountain elk and Mule deer; Focal species Pronghorn, wild horses, and Northern goshawk; Sensitive Lewis’ woodpecker; raptors; and a number of Birds of Conservation Concern, including: Flammulated owl; Calliope hummingbird; Olive-sided flycatcher; Willow flycatcher; Loggerhead shrike; Sage thrasher; Brewer’s sparrow; and Sage sparrow; as well as Focal bird species: Chipping sparrow; Nashville warbler; Red-naped sapsucker; Red-eyed vireo; Yellow warbler; MacGillivray’s warbler; Western wood peewee; Warbling vireo; Vesper sparrow; Lincoln’s sparrow; and Savannah sparrow. This is an extraordinarily high number of Sensitive-designated species, Focal species, and species in decline (which also would include Threatened Steelhead trout, Sensitive Redband trout, Sensitive Columbia Spotted frog, and many Sensitive plant species) that would potentially be harmed by the proposed action. This is especially egregious in that the No Action alternative should have been identified as the Environmentally preferred action or a modified No Action/riparian restoration alternative should have been proposed, identified as the Environmentally preferred action, analyzed in depth, and offered as the Proposed Action. Planning for potential continued decline of so many Sensitive wildlife species demonstrates Forest Service disregard for the Endangered Species Act goal of preventing upward trends in species listed—for example, from Sensitive to Threatened and from Threatened to Endangered listing. The agency’s willingness to sacrifice so many wildlife species also shows disdain for the National Forest Management Act’s goal of ensuring the viability of all native vertebrate species.” (BMBP comments,

p. 2, #3)

“Beneficial effects rather than further impacts to Mid-Columbia Steelhead trout, Redband trout, and Columbia Spotted frog is another reason for our support for the No Action alternative or our suggested ‘No grazing reauthorization plus riparian restoration’ alternative over the Proposed Action alternative.” (BMBP comment, p. 11, par. 3)

“Drop all planned thinning within goshawk Post Fledging Areas. Northern goshawks select for denser forest habitat for nesting and foraging. Apparently the planned thinning in goshawk PFAs is ignoring (and not discussing) Greenwood [Greenwald] et al.’s literature review on goshawk habitat requirements. Goshawks need dense forest, not just large trees, snags, and down wood. Along with other accipiter hawks, they evolved for a dense forest habitat niche and are out-competed by raptors and large owls for prey if the forest is opened up too much by logging. Goshawks also need at least 60% canopy closure for nesting and at least 40% for foraging, based on the science. The proposed thinning is so unrestricted that there is no guarantee that areas thinned would remain suitable goshawk foraging or nesting habitat.” (BMBP comments, p. 16, 2nd par.)

See our additional comments supporting our objection re: the need to maintain the viability of MIS species under NFMA at p.5, 2nd par. and p. 9, 1st par.

Resolution

BMBP has commented on its objection to the ONF’s failure to provide for viability of Management Indicator and other species in the Sunflower Grazing Reauthorization project. See our comment citations and sample quotes in the above paragraphs.

Resolution of this issue would include:

Re: Northern goshawk:

- * No commercial-size logging in suitable primary goshawk habitat and PFAs and any non-commercial size thinning (up to 9” dbh) should be dropped or limited to less than one quarter of a PFA and not occur within the nest core 30 acre buffer.

Re: deer and elk:

- * Retain more overall tree density and deer and elk cover—especially by dropping thinning in microhabitat patches where greater density would naturally occur, such as at higher elevations, within RHCAs, on North to Northeast aspect slopes or in hollows, and in wildlife connectivity corridors.

- * Road density should be reduced to at least the Forest Plan standards and objectives for elk.

Re: Redband trout and Columbia Spotted frog: See recommended remedies below, under Forest Plan violations—INFISH. Riparian and aquatic species in particular would benefit from no continued livestock grazing combined with active riparian restoration.

- * Other species mentioned in our comments would likely benefit from much less livestock grazing intensity (i.e. no livestock grazing or much smaller numbers, no livestock use or shorter seasons of livestock use than the average current seasons which avoid the early Spring reproductive season in April and May) and active riparian restoration to bring back native grasses, shrubs, and riparian hardwoods, including planting of native riparian hardwoods.

Forest Plan violations

Forest Plan violations in the Sunflower Grazing Reauthorization project include likely continued violations of Forest Plan standards by further setting back attainment of INFISH/PACFISH Riparian Management Objectives; not updating suitability of the land for livestock grazing based on current conditions; sacrificing other values and goals under the Forest Plan in order to perpetuate the single use of livestock grazing; failing to meet grazing standards (e.g. stubble height) and a disconnect between proposed actions and full use of the current best available science due to reliance on an outdated Forest Plan. Violation of Forest Plan standards also include potentially not adequately protecting Northern goshawk under the Eastside Screens and exceeding Forest Plan limits to detrimental impacts to soils.

Violation of the Forest Plan Eastside Screens

INFISH Violations

Our comments on potential Forest Plan violation regarding failure to demonstrate adherence to Riparian Management Objectives clearly state our concerns. See BMBP comments quoted and cited below:

“The ‘Sunflower Grazing Reauthorization and Wildlife Habitat Improvement Project’ Environmental Assessment’s Proposed Action (alternative 2) would reauthorize cattle grazing on Ochoco National Forest public/treaty lands on the Paulina Ranger District despite widespread severe over-grazing and long-term riparian damage to creeks and springs from current and past livestock grazing. Continued cattle use would set back badly needed recovery of riparian areas, natural plant cover and diversity, and soil integrity and fertility. Continued cattle grazing of the allotments area, even with proposed adaptive management and limited riparian restoration, threatens the continued viability of the Sensitive Redband trout populations and Sensitive Columbia Spotted frogs, downstream Threatened Mid-Columbia Steelhead trout, and many Sensitive or declining bird species, including the Greater Sage Grouse, as well as harming meadow habitat for Sensitive native Bumblebee species and a Sensitive butterfly species....Many Sensitive plants, especially riparian plants, would also be at risk from continued cattle grazing. Water quality and hydrologic flow recovery would also be significantly impeded by continued cattle grazing even with planned adaptive management and limited active riparian restoration.” (BMBP comment, p. 1, par. 1)

“Creeks are also drying up outside of exclosures, where the only lush, healthy forage and hardwoods remain. This level of intense forage and water consumption by cattle alone is in violation of numerous Forest Plan standards and goals, such as for higher residual stubble heights, less browsing on riparian hardwoods, the forage to be reserved for wildlife, and Riparian Management Objectives in general under PACFISH/INFISH to preserve fish habitat, riparian biodiversity, and ecological processes. Creeks in the allotments are clearly not meeting criteria for bank stability, sediment, width-to depth channel ratios, and riparian hardwoods. See our survey sheets and photos from sample riparian locations.” (BMBP comments, p. 9, last par.)

“We’re concerned that so much mechanized equipment use could contribute significant excess fine sediment to the channel, further erode banks, or otherwise degrade riparian conditions. What project design would be used to avoid these impacts?” (BMBP comment, p. 5, 3rd par.)

“All the severely damaged riparian areas outside exclosures are not moving toward Riparian

Management objectives under INFISH. “ (BMBP comment, p. 7, 3rd par.)

“This is not that reassuring, the voluntary possibility that now the Forest Service might adjust the season [of livestock use to meet Forest Plan goals, objectives, and desired conditions, as well as the ability to meet utilization and] streambank alteration standards after many decades of apparently not doing so in these allotments. The riparian and upland forage conditions are far too degraded to just hope that the Forest Service staff (some of whom may be the same during the long period of neglect) will now be able to meet the Forest Plan goals, objectives, desired conditions, and utilization and streambank alteration standards without reducing the number of cattle greatly and shortening the season of use or removing the cattle altogether.” (BMBP comment, p. 13, par. 2) (The brackets indicate a typo of missing text in the original comment.)

“We are strongly opposed to the conversion of any existing exclosures, including the Murray “Holding Pasture” to “holding” or “riparian” pastures for cattle use or any other livestock use. These exclosures are the only remaining examples of riparian vitality resembling conditions prior to livestock grazing. They are important reference condition or near reference condition areas to show how riparian areas in these allotments could flourish without livestock use. Allowing cattle into the exclosures defeats their purpose and degrades the last riparian reserves in the area for wildlife.”

“ Exclosure fences around spring development areas should not be ‘small’ but big enough to encompass the entire spring and ground water source riparian area to protect associated biodiversity. The planned exclosure around Cougar Creek is not big enough and should not be grazed at all. There is severe over-grazing by cattle all around Cougar Creek with very short stubble heights and areas of bare ground. (See our photos around Cougar Creek.) Cattle allotment planning needs to either fully exclude livestock from riparian areas except for small water gaps and exclude cattle from all damaged areas or else not reauthorize cattle grazing. It’s extremely sobering to witness the extreme cattle damage in these allotments.”(BMBP comments, p. 6, last two par.s)

“We oppose developing new spring sites for use by cattle and drilling any new wells for livestock. Springs are one of the greatest sources of natural biodiversity, along with other riparian areas such as creeks, seeps, and fens, and should no longer be allocated to and destroyed by livestock.” (BMBP comments, p.7, par. 1)

Resolution

BMBP has commented on the Sunflower Grazing Reauthorization project’s potential violations of INFISH Riparian Management Objectives. See our comments cited and quoted above.

To resolve this objection, the Forest Service needs to:

- *Reduce the number of cattle allowed to use allotment pastures with degraded riparian zones, creeks, or springs, including but not limited to those pastures not meeting Riparian Management objectives and not showing a consistent upward trend toward meeting RMOs.
- *Shorten the season of use for pastures with riparian zones, including creeks, streams, and springs to exclude the early Spring season of April and May, to allow for full growth and re-seeding of riparian zones before any cattle grazing. Remove the cattle off pastures every season before too much plant

reduction and trampling of meadows, floodplains, stream channels, and streambanks occurs in the fall—i.e. before wet weather resumes, so no later than the end of August or mid-September.

*Prohibit any cattle entry or use within riparian exclosures and keep exclosure fencing maintained.

“Exclosure fences around spring development areas should not be ‘small’ but big enough to encompass the entire spring and ground water source riparian area to protect associated biodiversity. The planned exclosure around Cougar Creek is not big enough and should not be grazed at all. There is severe overgrazing by cattle all around Cougar Creek with very short stubble heights and areas of bare ground. (See our photos around Cougar Creek.) Cattle allotment planning needs to either fully exclude livestock from riparian areas except for small water gaps and exclude cattle from all damaged areas or else not reauthorize cattle grazing....” (BMBP comments, p. 6, 2nd to last par.)

“If the Forest Service is going to reauthorize the cattle grazing on the Wind Creek allotment (which we oppose), the North Wind Creek exclosure should be built before any grazing is allowed, not waiting to see if proposed grazing management changes result in the desired effects in North Fork Wind Creek. It is easily foreseeable that proposed grazing management changes would not be sufficient, as there is so much long-term livestock damage to these creeks and the Forest Service is not proposing a definite reduction in cattle numbers, changes in the season of use, or keeping cattle completely out of the riparian areas.” (BMBP comments, p. 7, last par.)

*Drop development of any new spring sites and wells for cattle.

“There needs to be a strict prohibition against causing any more impacts to groundwater-dependent ecosystems. Don’t develop any more springs for livestock use. Instead use exclosure fencing around all existing springs and fens to keep livestock out and allow for the passive restoration of spring and fen riparian functions and biodiversity. Existing spring developments should be changed to meet proposed criteria or decommissioned and restored, as in the case of cattle removal.” (BMBP comment, p. 15, 2nd par.)

“Spring ‘development’ (destruction) for livestock should not be an exception that allows for fence construction within spring sites, seeps, or other ground water-dependent ecosystems, such as fens. These areas should have large exclosure buffers that encompass the entire affected zone—or better yet, close that part of the pasture to livestock use.” (BMBP comments, p. 15, 3rd par.)

***Trees cut for in-channel wood and floodplain roughness should not be trees contributing to shade (or bank stability) at all. Get rid of loopholes! Ground-disturbing equipment should not be used in RHCA’s at all unless operating from a Forest Service open road. Except for loophole exceptions that allow for more riparian damage, we generally support proposed aquatic restoration criteria. There are science-based guidelines for most appropriate cross-channel angles for tree felling for large wood abundance.” (BMBP comment, p. 14, 2nd to last par.)

*Drop commercial logging and heavy equipment use within RHCA buffers except for large wood placement up to 18” dbh for riparian restoration which retains conifers providing streambank stability and primary shading.

*Drop any planned heavy equipment stream drainage crossings.

Failing to adhere to Eastside Screens Protections for Northern goshawks

Our comments on the EA regarding goshawk clearly explain our rationale for this objection:

“Drop all planned thinning within goshawk Post Fledging Areas. Northern goshawks select for denser forest habitat for nesting and foraging. Apparently the planned thinning in goshawk PFAs is ignoring (and not discussing) Greenwood [Greenwald] et al.’s literature review on goshawk habitat requirements. Goshawks need dense forest, not just large trees, snags, and down wood. Along with other accipiter hawks, they evolved for a dense forest habitat niche and are out-competed by raptors and large owls for prey if the forest is opened up too much by logging. Goshawks also need at least 60% canopy closure for nesting and at least 40% for foraging, based on the science. The proposed thinning is so unrestricted that there is no guarantee that areas thinned would remain suitable goshawk foraging or nesting habitat.” (BMBP comments, p. 16, 2nd par.)

Resolution

* Keep noncommercial thinning away from recently active goshawk nest sites, including outside the 30 acre buffer around the nest—i.e. for goshawk nests occupied within the last 5 years.

**“Drop all planned thinning within goshawk Post Fledging Areas....” (BMBP comment, p. 16, 2nd par.)

Road system management:

Our related comments support planned road closure and decommissioning and also propose more effective closure and decommissioning methods than have usually been used on the Ochoco National Forest:

“While we support closure and decommissioning of ecologically damaging, unnecessary, or redundant roads, rocks and berms often fail to prevent continued ATV or truck traffic. The post and pole gates are often destroyed or modified for easy access. The Forest Service should use strong metal gates for system roads and fully decommission hydrologically connected and otherwise ecologically damaging roads. Preventing continuing resource (life source) damage and hydrologically stabilizing the road should be required, not be optional. We ask that all ecologically damaging roads, overgrown roads, and redundant roads identified for closure be closed permanently. As many as possible of the damaging roads should be fully decommissioned or scheduled officially for future decommissioning if funding is not available currently.” (BMBP comments, p. 8, 3rd par.)

Potential Violation of Soil Protection Standards

Our comments explain our objection:

“The proposed action would increase already extensive detrimental soil impacts to levels that would likely exceed Forest Plan standards, while the No Action or modified No Action/Active riparian restoration alternative would greatly decrease detrimental soil conditions and more quickly restore riparian areas and plant biodiversity. The Environmental Assessment analysis supports our concern that existing detrimental soil impacts likely already violate the Forest Plan standard limit and would definitely perpetuate violation of the Forest Plan 20% of the total activity area standard after implementation of Alternative 2.” (BMBP comments, p. 2, #2)

“ Re: Table 2, regarding detrimental soil impact calculation for Alternative 2, in many cases much more

than 20 feet (10 feet on each side of the drainage) is badly over-grazed, trampled, compacted, and/or contributing excess fine sediment to creeks. See our field survey photos showing wider expanses of detrimental soil conditions. This indicates Forest Service under-estimating of detrimental soil conditions from alternative 2.” (BMBP comment p. 10, par. 2)

“The proposed action description for detrimental soil conditions in Table 2, pp. 18-19, fails to state whether or not detrimental soil conditions from the proposed action would cumulatively exceed the Forest Plan standard limit of 20% of an area or other relevant Forest Plan standards. The analysis also understates the scale of effects from alternative 2, with no survey of existing detrimental soil impacts, including upland overgrazed areas.” (BMBP comments, p. 10, par. 3)

“It sounds like planned non-commercial thinning with tracked excavating equipment with booms would be likely to exceed the Forest Plan limit for detrimental soil impacts of 20% of an activity area when calculated combined with existing detrimental soil impacts. Further, [the] EA does not analyze in depth the effects of intensive thinning up to 20.9” dbh over larger areas for specific areas.” (BMBP comments, p. 10, par. 4)

Resolution

BMBP has commented on our objection that the Sunflower Grazing Reauthorization Project as proposed could violate Forest Plan soil protection standards. See our comments quoted and cited above.

To resolve this objection, the Forest Service needs to do the following:

- *Identify specific areas where extensive or intensive ground disturbing management is planned and, additionally, specific areas that already have existing high levels of ground disturbance and soil impacts approaching, equal to, or exceeding the 20% area limit for detrimental soil disturbance in the Sunflower Grazing Reauthorization project area. Then the overlap of planned extensive or intensive ground disturbance with existing high levels of detrimental soil impacts should be analyzed in order to identify areas where additional detrimental soil impacts should not be allowed.
- *Drop ground disturbance planned in areas which have already high degrees of detrimental soil impacts or sensitive soils making further extensive ground disturbance likely to lead to violation of Forest Plan standards for soil protection with proposed management. Sources of additional detrimental soil impacts can include continued livestock use of an area, ground disturbance from planned thinning, or soil impacts from planned riparian restoration actions.
- *Drop thinning of any steep slopes or areas within RHCA's to reduce potential erosion, loss of soil integrity, and potential sedimentation of creeks, if adjacent.
- *Drop any ground disturbing management in areas unlikely to meet Forest Plan standards for detrimental soil standards without further mitigation, as mitigation is unlikely to be 100% effective.
- * “Keep cattle out of lithosol habitat (“scabland”) completely.” (BMBP comment, p. 14, 2nd to last par.)

Suitability of the Land for Livestock Grazing and Violation of Grazing Standards

Our comments express our concerns for these objections.

Re: Suitability of the land for livestock grazing:

“The ‘Sunflower Grazing Reauthorization and Wildlife Habitat Improvement Project’ Environmental Assessment’s Proposed Action (alternative 2) would reauthorize cattle grazing on Ochoco National Forest public/treaty lands on the Paulina Ranger District despite widespread severe over-grazing and long-term riparian damage to creeks and springs from current and past livestock grazing. Continued cattle

use would set back badly needed recovery of riparian areas, natural plant cover and diversity, and soil integrity and fertility.” (BMBP comment, p. 1, par. 1)

“The Sunflower allotment lands should no longer be considered suitable for domestic livestock grazing based on current extensive and intensive cattle grazing damage to riparian areas, plant diversity, forage abundance, soils, and associated water quality, hydrologic flows, and wildlife habitat. The Ochoco Forest Plan is very outdated, including in its designation of lands suitable for livestock grazing. The Sunflower allotment cluster area has had such extreme over-grazing for so long that the area likely will never fully recover for decades or meet Forest Plan standards and guidelines, including PACFISH/INFISH RMOs and newer stream assessment objectives without the complete removal of all cattle and the use of both active riparian restoration and long-term passive recovery made possible by cattle removal.” (BMBP comment, p. 4, 2nd to last par.)

“Based on the maps of proposed grazing-related actions, it’s clear that too many water developments are being used and planned for cattle, including new wells and new spring development and much water development reconstruction, for the area to be viable for cattle grazing. See Figures 2, 3, and 4.” (BMBP comment, p. 8, 2nd par.)

“The provision of the current rate of forage for cattle, as proposed under Alternative 2 (see Table 1), is obviously unsustainable, as virtually no forage was left in both the Sunflower and the Wind Creek allotments (we didn’t check the Dry Corner allotment) as of early September. Significantly, most of the cattle had already been removed, probably due to the lack of forage and diminishing water availability. The cattle are consuming far more than their share (assuming that they should have a share at all), with nothing left for fall forage for wildlife. No wonder Mule deer are declining! While there are other factors in Mule deer decline, in the Sunflower allotments, the lack of forage left for deer may be a key cause.” (BMBP comments, p. 9, 3rd to last par.)

Comments re: violation of grazing standards, particularly stubble height:

“Creeks are also drying up outside of exclosures, where the only lush, healthy forage and hardwoods remain. This level of intense forage and water consumption by cattle alone is in violation of numerous Forest Plan standards and goals, such as for higher residual stubble heights, less browsing on riparian hardwoods, the forage to be reserved for wildlife, and Riparian Management Objectives in general under PACFISH/INFISH to preserve fish habitat, riparian biodiversity, and ecological processes.” (BMBP comments, p. 9, 2nd to last par.)

“There is severe over-grazing by cattle all around Cougar Creek with very short stubble heights and areas of bare ground. (See our photos around Cougar Creek.) Cattle allotment planning needs to either fully exclude livestock from riparian areas except for small water gaps and exclude cattle from all damaged areas or else not reauthorize cattle grazing. It’s extremely sobering to witness the extreme cattle damage in these allotments.” (BMBP comments, p. 6, most of last par.)

“The Forest Service is not obligated to reauthorize livestock grazing when the damage threatens or destroys other values under the Forest Plan or fails to meet Forest Plan standards, as is the case with these allotments. Remaining stubble as short as 1 to 2” tall with areas of bare ground does not meet Forest Plan standards or best available science constraints.” (BMBP comments, p. 7, 3rd par.)

“Conditions are currently so bad on the Wind Creek allotment (as of early September 2020) that most of these pastures, if not all, need to have no cattle grazing at least until after bunch grass seed set every

year for years to come to recover from long-term over-grazing effects to the bunch grasses, as well as to most other plants.” (BMBP comment, p. 7, last par.)

“Based on our field surveying, cattle were not being removed from pastures before the forage stubble height limit was reached. Current typical stubble height requirements for removal of livestock are triggered by reaching 4 to 6” of stubble height. Such stubble height limits were violated —apparently as the norm, considering the long-term cumulative legacy effects—across pastures and allotments. So monitoring of conditions and removal of cattle prior to stubble height thresholds being reached are not “routine administration” on this part of the Ochoco. So now a whole new culture of livestock management would have to be instilled and enforced, preferably with different new staff who were not involved with allowing the previous cattle degradation to occur year after year.” (BMBP p. 13, par. 3)

“ Almost all pastures are already in unsatisfactory condition. The starting points for proposed monitoring and standard enforcement should start immediately with these dismal conditions. These measures should have been taken decades ago. Almost every part of pastures we surveyed were at only one to two inches of stubble with extensive or intermittent bare ground. Severely degraded creek banks and stream channels and hardly any or no riparian hardwoods was the norm outside of exclosures. Notably our field surveying locations were relatively random, based on easily accessible mapped locations of livestock ponds and road crossings of creeks and on a few opportunistic stops, not based on selecting for the most damaged locations.” (BMBP comments, p. 14, par. 4)

Resolution:

*Due to the current lack of suitability of the Sunflower allotments area for cattle grazing, our preferred resolution would be no reauthorization of livestock grazing, as under the No Action alternative, with two years before cattle removal, but with active riparian restoration implemented to restore riparian conditions from what appears to be decades of legacy damage from over-grazing from livestock. Current cattle use at current numbers and current long seasons of use apparently is preventing any significant riparian recovery, as well as not meeting stubble height requirements (as of early September 2020, based on our field surveying) over the majority of the Sunflower and Wind Creek allotments. Only complete removal of cattle and related passive recovery over years may restore riparian areas to meet riparian management objectives and restore conspicuous large areas of bare ground, as well as simplified plant communities with little botanical diversity.

If grazing is reauthorized, the following partial remedies should apply:

*“Why hasn’t all this monitoring to meet grazing criteria and Forest Plan requirements not been done? Range monitoring should be done more than twice a season to avoid damage. Monitoring at the end of the grazing season could indicate changes that need to be made for the next season but does not prevent the tremendous amount of damage that could occur between mid-season and the end of the season. There should be at least three monitoring visits during the grazing season for each pasture in each allotment, such as in late Spring, mid-summer, and at the end of the season. If active herding is required, ideally the permittees would be required to move the cattle at least every three or four days. More monitoring is needed to make sure that active herding is happening, there are no exclosure fence gaps, that cattle numbers and distribution are as they were directed, and that thresholds for stubble heights, riparian hardwoods, and bank stability (etc.) are not being violated.” (BMBP comments, p. 13, 2nd to last full par.)

* “Were the cattle in these allotments taken off the pastures early due to lack of forage in 2020? It looked that way in early September. So much for our faith in the Forest Service using “range readiness”

criteria to guarantee avoidance of legacy soil, plant cover, and riparian impacts. The Forest Service should be monitoring livestock grazing frequently enough to stop impacts before they become severe or legacy impacts regardless of the status or stage of the permit authorization process.” (BMBP comments, p. 12, last par.)

*“Conditions are currently so bad on the Wind Creek allotment (as of early September 2020) that most of these pastures, if not all, need to have no cattle grazing at least until after bunch grass seed set every year for years to come to recover from long-term over-grazing effects to the bunch grasses, as well as to most other plants.” (BMBP comment, p. 7, 2nd to last par.)

* “The stubble height standard should be at least four inches for all pastures and at least six inches for all riparian zones. This is standard on other Forests where there is active herding or up-to-date better grazing management being practiced.” (BMBP comment, p. 14, par. 3)

*“Stubble height triggers for livestock movement in green line plants should be six inches across the board, not just for existing unsatisfactory conditions. Unsatisfactory conditions are already ubiquitous across these allotments. This, too, is standard for Forests and Districts with better grazing management, using best available science. Given the drastically altered riparian conditions and greatly diminished upland plant diversity, we are asking the Forest Service to automatically require reductions in livestock numbers, a full-time rider for each allotment, rest of pastures, and increased stubble height, as well as a shorter grazing season (e.g. July 15th to mid or late September) based on existing degraded conditions, rather than allowing another season of damage first. Of course we support No Action or our modified No Action/active riparian restoration alternative for quicker riparian recovery and the opportunity for years of passive recovery to fully restore proper functioning over long-term continued livestock use.” (BMBP comments, p. 14, par. 5)

* “ The Forest Service needs to use the precautionary principle to achieve maximum, not minimum riparian and upland biodiversity restoration. It is not just a matter of protecting existing riparian and upland diversity and ecological processes, but of restoring them where they no longer exist, which applies to the majority of these allotments outside of the small exclosures.” (BMBP comments, p. 14, par. 6)

Potential Violation of Region 6 FEIS on Invasive Plant Management

The Region 6 Invasive Plant Management FEIS emphasizes prevention of the introduction and dispersal of invasive plants. Prevention measures need to include limiting ground disturbance and controlling livestock as vectors of invasive plants to be effective. We are especially concerned regarding the high potential for invasive plant introduction and dispersal in the Sunflower allotment complex because of the already very extensive detrimental soil impacts, bare ground, and minimal forage cover, as expressed above under detrimental soil impacts and failure to meet stubble height grazing standards objections. As discussed below, much more ground disturbance is planned, with no reduction in cattle numbers or length of the grazing season to reduce the potential for over-grazing and perpetuation of extensive ground disturbance. There is also no apparent strategic plan to identify the sources of invasive plant species into the area and to control the vectors, which include the cattle for dispersal, if not for introduction, of the invasive plants.

Our comments document our concerns:

‘The Proposed Action would increase the introduction and dispersal of exotic invasive plants. Exotic invasive plants that would be increased by extensive ground disturbance through continued cattle grazing, extensive tree thinning, water development construction and reconstruction, and more fencing, plus the use of heavy equipment such as bulldozers for riparian restoration, include the already existing: Bull thistle; Butter and eggs; Canada thistle; Common mullein; Common St. Johnswort; Dalmatian toadflax; Diffuse knapweed; Houndstongue; Hardheads; Jointed goatgrass; Leafy spurge; Medusahead; North Africa grass; Oxeye daisy; Scotch cottonthistle; Spotted knapweed; Sulphur cinquefoil; and Whitetop, for a combined total acreage over the three allotments of 744.90 acres of invasive plants—before they are dispersed further by ground disturbance. Cattle are known contributors to invasive exotic plant species introduction and dispersal in allotments. This is a strikingly high acreage and number of exotic invasive plant species already established in the allotments.’” (BMBP comments, p. 3, #5, 1st par.)

“Continued cattle use of the allotments would continue to disperse the existing exotic invasive plants and likely introduce more invasive plants. The Region 6 FEIS on invasive plant management requires prevention of the sources of invasive plants, not just perpetual herbicide spraying or other ‘treatment’. Cattle are a known source of exotic invasive plants. Until the cattle are excluded from all existing infestations of invasive plants, it is foreseeable that their dispersal would continue, establishing new populations. Then it would be virtually impossible to control the invasive plants, as demonstrated by the high acreage and number of exotic plant species already in the allotment. The National Environmental Policy Act incorporates the goal of using analysis to solve existing resource (life source) problems. The Forest Service should have analyzed the issue of cattle perpetuation of invasive plant establishment and spread in more depth and included rather evident solutions to this problem, such as completely excluding cattle from invasive plant infested areas as part of the Proposed Action or proposing the No Action alternative.” (BMBP comments, p. 3, #5, 2nd par.)

“ Re: the Table 2 effects determination of “moderate” for No Action and “low” for the Proposed Action for risk of “range improvements” to contribute to establishment and/or spread of invasive plants, this hardly makes sense, as wildlife habitat “improvements” are not proposed for the No Action alternative yet are judged to contribute to establishment and/or spread of invasive plants more than for alt. 2, which does plan such “range improvements.” (BMBP comment, p. 12, 2nd to last par.) In other words, increased ground disturbance is planned for the proposed action, which provides a larger seedbed for invasive plants, while the No Action alternative would decrease ground disturbance after cattle are removed from the area and allows for much greater passive recovery of plant cover growth. Thus the proposed action should be predicted to have more potential for invasive plant introduction, dispersal, and establishment than the No Action alternative. This is especially the case since cattle are known vectors for introduction and dispersal of invasive plants.

Resolution:

* “All existing invasive plant populations should be buffered from ground disturbance and cattle should be excluded from entering them. All Region 6 FEIS prevention measures regarding invasive plant

introduction and dispersal should be followed. Permittees should be required to use only weed free feed or pastures for at least two weeks prior to coming onto National Forest lands.” (BMBP comments, p. 16, 2nd to last par.)

* We also recommend evaluating likely entry points for exotic invasive plants on the ground as part of field surveys and figuring out means of control for point sources and more indirect vectors. Often invasive plants start at roads or at points of entry (holding corrals) for livestock. Cattle also trail along riparian zones, dispersing invasive plants that catch on their hair, such as Houndstongue. Cattle manure can also provide a rich source of nutrients for invasive plant growth, as I’ve seen with Star thistle along the John Day River.

Failure to Uphold Other Forest Plan Goals and Objectives

While the Forest Service dutifully reiterates the guidance of multiple planning documents and legally binding Acts that require management decisions to be “consistent with other multiple uses and objectives” and to ensure that “continued domestic livestock grazing is consistent with the goals and objectives of the Forest Plan”, the agency fails to use in-depth analysis to determine whether continued livestock grazing is really consistent with the multiple uses protected by the Forest Plan. Forest Plan goals and objectives include preserving hydrologic flows, retaining riparian ecosystem functioning and biodiversity, protecting soil integrity, and protecting the habitat needs of wildlife and aquatic species that evolved with pre-European colonization historic levels of water abundance and plant biodiversity. Yet extreme over-grazing situations in allotments such as the Sunflower allotment complex, based on the cumulative impacts of both legacy over-use by livestock for decades and continued livestock damages preventing full recovery, challenge the Forest Service automatic assumption of consistency with other Forest Plan goals and objectives. Other past and ongoing management impacts from timber sales and roads in the Sunflower allotment complex also contribute to the existing degradation, but full ecological restoration entails removal of the causes of degradation, including cattle grazing, which is admitted in the EA to be an unnatural impact that is well beyond the historic range of variability.

Despite such existing legacy damage, the Forest Service is merely proposing cosmetic reforms that are relatively ineffectual by not supporting cessation of cattle grazing or at the least, significant reductions in the number of cattle allowed and shortening of the grazing season to allow for significant ecological recovery.

The Forest Service not only has the ability, but the obligation under the law, to ensure that proposed management is consistent with other multiple use goals and objectives of the Forest Plan:

“The purpose of NEPA review and evaluation of livestock grazing reauthorization in the Sunflower Cluster is to...ensure livestock grazing would be managed in a manner that maintains or moves National Forest grazing allotments towards the objectives, desired conditions, and standards and guidelines identified in the Ochoco National Forest Land and Resource Management Plan (Forest Plan).

Review and evaluation of livestock grazing reauthorization on the Sunflower Cluster allotments is needed because:

- Where consistent with other multiple use goals and objectives, Congressional intent is to allow grazing on suitable lands (Multiple Use Sustained Yield Act of 1960, Forest and Rangeland Renewable Resources Planning Act of 1974, Federal Land and Management Act of 1976)....
- It is Forest Service policy to make forage available to qualified livestock operators from lands suitable for grazing consistent with the Forest Plan (FSM 2203.1, 36 CFR 222.2(c)).
- It is Forest Service policy to contribute to the economic and social well-being of people by providing opportunities for economic diversity and promoting stability in communities that depend on range resources for their livelihood (FSM 2202.1).” (EA (final version), p. 3, underlining emphasis ours)

As mentioned before, planning to continue unsustainable levels of livestock use in the face of extreme climate change raising ambient temperatures and causing droughts, leading to predictable water scarcity in already very marginal and degraded lands where creeks that may have been perennial in the past appear to be drying up, is not providing any opportunity for economic diversity, nor promoting long-term or even current stability in communities that depend on range resources for their livelihood.

Our comments supporting this objection:

“The Forest Service is not obligated to reauthorize livestock grazing when the damage threatens or destroys other values under the Forest Plan or fails to meet Forest Plan standards, as is the case with these allotments. Remaining stubble as short as 1 to 2” tall with areas of bare ground does not meet Forest Plan standards or best available science constraints. All the severely damaged riparian areas outside exclosures are not moving toward Riparian Management objectives under INFISH.” (BMBP comments, p. 7, 3rd par.)

“This is a tremendous amount of taxpayer-subsidized bolstering planned for a failed and highly ecologically destructive cattle grazing situation: 50 water developments and 26.2 miles of fence reconstruction, 8 new water developments, 4 miles of new fencing, non-commercial young and mature tree thinning of 1,966 acres, pile burning, stream restoration on three creeks—all to prop up a cattle grazing regime that is clearly not working with these methods. This is insane.” (BMBP comments, p. 6, 3rd par.)

“These plans demonstrate how unsustainable this allotment is for cattle grazing, when wells are dug and maintained to support the cattle’s heavy water demand on an area with little water, where the creeks and springs have already been sacrificed to cattle at the expense of plant biodiversity and water retention for wildlife and fish. The unsustainability of the situation is also clear from the perpetual plans for reconstruction of water developments, construction of new spring developments and wells, and active riparian restoration to start repairing long-term livestock damage on a woefully limited basis compared to the extensiveness of the damage.” (BMBP comments, p. 6, par. 4)

“The costs of new water developments, water development reconstruction, miles of new fencing, and active riparian restoration far outweigh any benefit to the ranchers. The public and the ecosystem bear the expense. These ecological expenses include continuing destruction of fish populations; and loss of: water retention; water and forage for wildlife; natural hydrologic and riparian functioning; plant diversity; and recreational and scenic values. Beyond all this, the cattle also contribute to the severity of climate change effects through both methane gas emissions and depletion of water, loss of water retention, and soil and plant impacts that decrease the viability of wildlife species. Elk also spend energy

and lose otherwise suitable habitat by actively avoiding cattle.” (BMBP comments, p. 7, 4th par.)

“Elk and deer would be far better distributed on these allotment areas if they had enough to eat. It’s no wonder that we were not seeing elk or deer or even much sign of elk (none) or deer use (few tracks) because there is not enough forage left for them due to the excessive cattle consumption of already marginal available forage. Cattle are at least as big a factor in poor deer and elk distribution and excessive fine sediment loading in streams as roads, if not more.” (BMBP comments, p. 5, par.2)

“ It seems that the Forest Service really doesn’t care about Sensitive plants or enough about riparian ecological functioning and biodiversity to avoid foreseen negative impacts to both from continued livestock impacts. The agency bias toward livestock destruction violates Forest Plan requirements to protect other Forest Plan values. Likewise, the Forest Service doesn’t seem to care about negative effects to recreation and wildlife from continued cattle impacts. (See Table 2 Proposed Action negative effects determinations to Sensitive plants and their habitat versus No Action Beneficial effects and No impact effect determinations for grazing impacts and effects from proposed “range improvements” on EA p. 23 and risk to dispersed recreation sites and Wilderness values determinations on EA p. 24.)” (BMBP comments, p. 12, 4th par.)

“The Forest Service does not have a good track record for ecologically sound spring development. There has been little good placement, few adequately sized exclosures, and little avoidance of severe degradation of associated biodiversity for many decades, across multiple Forests. Livestock use has been allowed to outweigh all other Forest Plan values for far too long. Spring development inevitably leads to increased livestock use and degradation in the spring area, so we oppose new spring developments and support full exclosure of spring areas (and other riparian zones) from cattle [and] sheep for as long as livestock are allowed on the “pastures”. Too much riparian biodiversity has already been sacrificed to cattle. Springs should receive at least as much protection as lithosol habitat, which is not proposed for new water developments or other livestock-attracting modifications.” (BMBP comments, p. 15, par. 4)

Resolution:

*Our preferred remedy would be to not reauthorize livestock grazing on the Sunflower Cluster allotments, as continued livestock use seems doomed to failure, especially with legacy degradation and escalating extreme climate change. Complete removal of the cattle after two years would best ensure meeting all the other Forest Plan goals and objectives that are currently not being met. However, including planned active riparian restoration in the modified No Action alternative would help meet riparian management objectives faster and better support recovery of fish populations and other aquatic species, as well as sensitive plants, and better restore hydrologic flows and floodplains for greater water retention, which is badly needed. We ask for a combination of No Action with planned active riparian restoration.

*If cattle grazing is reauthorized, there needs to be significant reduction in cattle numbers allowed on these allotments and a shorter grazing season overall that excludes the early Spring reproductive season (April and May) to allow for plant re-seeding across the area and better re-growth of riparian hardwoods. The fall grazing season should not extend beyond mid-to late September or when stubble height limits are reached, whichever comes first. There should still be active herding and adaptive management planned, as well as rotational deferring of pastures for rest. Cattle should be fully excluded from

perennial riparian creeks, springs (the full riparian zones), and badly damaged intermittent stream sections either by fencing (temporary or permanent) or by complete exclusion from that portion of the pasture. Livestock ponds blocking natural stream channels need to be removed to allow for natural stream systems and riparian functioning.

III. The Sunflower Grazing Reauthorization Project Would Violate the Endangered Species Act

We are very concerned that the Forest Service may not be adhering to the intent and management guidance of the Endangered Species Act. We are concerned regarding Forest Service disregard for the need to maintain sufficient suitable habitat and conditions to prevent a trend toward federal up-listing for Threatened-listed Mid-Columbia Steelhead trout; Threatened-listed Gray wolf; Sensitive-listed Columbia Spotted frog and Redband trout; Sensitive-listed plant species; and Northern goshawk, which is cumulatively threatened by the ever escalating scale and pace of heavy logging based on density reduction. All of these species have known active or potential suitable habitat in the Sunflower Grazing Reauthorization project area that is potentially threatened by the Sunflower Grazing Reauthorization management plans.

Our comments explain our concerns regarding potential violation of the Endangered Species Act through degradation or elimination of suitable and core habitat setting back species recovery, threatening loss of population viability, or otherwise contributing to a federal uplisting trend for the species. Comments re: Threatened-listed Mid-Columbia River steelhead trout, Sensitive Redband trout, Sensitive Columbia spotted frog and other Sensitive designated wildlife species, including Sensitive Greater sage grouse, Sensitive butterfly and bee species, and Birds of Conservation Concern:

“The ‘Sunflower Grazing Reauthorization and Wildlife Habitat Improvement Project’ Environmental Assessment’s Proposed Action (alternative 2) would reauthorize cattle grazing on Ochoco National Forest public/treaty lands on the Paulina Ranger District despite widespread severe over-grazing and long-term riparian damage to creeks and springs from current and past livestock grazing. Continued cattle use would set back badly needed recovery of riparian areas, natural plant cover and diversity, and soil integrity and fertility. Continued cattle grazing of the allotments area, even with proposed adaptive management and limited riparian restoration, threatens the continued viability of the Sensitive Redband trout populations and Sensitive Columbia Spotted frogs, downstream Threatened Mid-Columbia Steelhead trout, and many Sensitive or declining bird species, including the Greater Sage Grouse, as well as harming meadow habitat for Sensitive native Bumblebee species and a Sensitive butterfly species.” (BMBP comments, p. 1, par. 1)

“Based on the EA analysis, wildlife species that would be threatened by the proposed cattle grazing reauthorization (and some by the proposed extensive tree thinning up to 16-20.9” dbh) but would benefit from the No Action or modified No Action/Active riparian restoration alternative include: the Sensitive Greater Sage grouse; the Sensitive Silver-bordered Fritillary butterfly; the Sensitive Western bumble bee and the Morrison bumble bee; the Sensitive Fir Pinwheel snail; Management Indicator species Rocky Mountain elk and Mule deer; Focal species Pronghorn, wild horses, and Northern goshawk; Sensitive Lewis’ woodpecker; raptors; and a number of Birds of Conservation Concern, including: Flammulated owl; Calliope hummingbird; Olive-sided flycatcher; Willow flycatcher; Loggerhead shrike; Sage thrasher; Brewer’s sparrow; and Sage sparrow; as well as Focal

bird species: Chipping sparrow; Nashville warbler; Red-naped sapsucker; Red-eyed vireo; Yellow warbler; MacGillivray's warbler; Western wood peewee; Warbling vireo; Vesper sparrow; Lincoln's sparrow; and Savannah sparrow. This is an extraordinarily high number of Sensitive-designated species, Focal species, and species in decline (which also would include Threatened Steelhead trout, Sensitive Redband trout, Sensitive Columbia Spotted frog, and many Sensitive plant species) that would potentially be harmed by the proposed action. This is especially egregious in that the No Action alternative should have been identified as the Environmentally preferred action or a modified No Action/riparian restoration alternative should have been proposed, identified as the Environmentally preferred action, analyzed in depth, and offered as the Proposed Action. Planning for potential continued decline of so many Sensitive wildlife species demonstrates Forest Service disregard for the Endangered Species Act goal of preventing upward trends in species listed—for example, from Sensitive to Threatened and from Threatened to Endangered listing. The agency's willingness to sacrifice so many wildlife species also shows disdain for the National Forest Management Act's goal of ensuring the viability of all native vertebrate species." (BMBP comments, p. 2, #3)

"There is no guarantee that Silver-bordered fritillary, Western bumblebee, or Morrison's bumblebee would remain viable under the Proposed Action management plan. 'May impact individuals or habitat' could be a death sentence for these Sensitive species in the area, as they rely on a diversity of flowers throughout spring and summer. Plant and flower diversity is greatly diminished in the allotment area due to over-grazing. Continued over-grazing seems inevitable under alternative 2 and could eliminate these species' food source. Fir pinwheel viability is also at risk under alternative 2 due to continued cattle degradation of most riparian areas." (BMBP comments, pp. 11-12, last and 1st par.s)

"The effects determination statements in Table 2 for Birds of Conservation Concern and Focal species reflects a lack of species-specific effects analysis and an unsupported assumption that "managing habitat within HRV" somehow ensures that adequate habitat would be provided for all of these diverse species with different habitat needs overall. This ignores the very unnatural impacts of continued over-grazing and trampling by a big exotic invasive species: European cattle. These impacts include loss of sufficient grass height and shrubs for ground and shrub bird nesting and foraging, and exposure of ground nests to heavy and concentrated cattle trampling. Riparian areas are key biodiversity hot spots in the region, yet most of them in the allotments area would be negatively affected by cattle, as is the case now. 'HRV' (Historical Range of Variability) is also often estimated by the Forest Service based on inappropriate comparisons with already over-logged and over-grazed lands during years post-dating the required baseline of prior to European colonization. The use of inappropriate baseline data could then compare current conditions with already over-logged and over-grazed conditions rather than contrasted with natural conditions pre-dating European colonization." (BMBP comments, p. 12, par. 2)

Gray wolf:

Background re: Threatened-listed Gray wolf in the Ochoco National Forest from our Black Mountain timber sale comments that illuminate missing cumulative effects analysis in the Sunflower Grazing Reauthorization EA:

The Ochoco National Forest is "not considered" occupied by wolves based on no population study or wolf surveys or camera sets or fur sets on the ground. So it is really not known if the Ochoco National Forest is currently occupied by wolves, since not all wolves in Oregon are radio-collared. Even

dispersing wolves need to be able to forage and have security from humans who would shoot or trap them, so as to perpetuate the species' recovery through dispersal for genetic diversity in the packs.

As elk and deer are the primary prey for Gray wolves and effects to elk and mule deer from the Sunflower Grazing Reauthorization project (as well as the pending Black Mountain timber sale and other timber sales) would result in a negative trend in habitat, we are concerned that too much logging of thermal and hiding cover for deer and elk from proposed thinning would also negatively affect the viability of recovering resident or transitory dispersing wolves in the Sunflower project area.

There are obvious problems with the DEIS rationales for no adverse impacts to Gray wolves as: Gray wolves are known to disperse through the Ochoco, so this is a known area of wolf activity; security habitat would likely be reduced for wolves overall due to loss of cover for elk and deer and increased human disturbance from new "temporary" roads and re-opened closed roads in other "projects" such as the Black Mountain timber sale; and there are significant foreseeable negative effects to Gray wolves from displacing them (along with their elk and deer prey) to adjacent private lands—i.e. higher risk of wolves predated on livestock and thus higher risk of wolves being killed. The wolves are likely to be adversely affected.

Comments re: Gray wolf in response to the Sunflower Grazing Reauthorization project EA:

"Potential negative effects of the Proposed Action alternative to Region 6 Sensitive species are ignored in Table 2 effects determinations. These include the continued loss of forage to cattle affecting elk and Mule deer, whom we did not see at all during early September field surveying, when there was virtually no forage left from the cattle over-grazing and hardly any hardwoods outside small exclosures. This lack of forage would also negatively affect Pronghorn and indirectly affect Gray wolf by limiting its major prey species. Yet Gray wolf has a determination of 'not likely to adversely affect', and the determinations for elk, Mule deer, and Pronghorn hangs on consistency with an extremely outdated Forest Plan. Forest Plan consistency has not prevented declines in many species on the Ochoco or on other Forests with similarly outdated Forest Plans across eastern Oregon and southeastern Washington. There is no evidence that continued viability of these species can be 'expected' based on Forest Plan consistency alone. In fact, there is a regional decline in Mule deer under these Forest Plans and Pronghorn remain well below historic numbers." (BMBP comments, p. 11, 2nd to last par.)

Comments re: Sensitive-listed plant species:

"Based on the Environmental Assessment analysis, Sensitive plants that could be harmed by continued livestock grazing but would benefit from either the No Action alternative or our suggested modified No Action/Active riparian restoration alternative include the following, which are either documented or suspected to be in the area and are mostly associated with riparian areas such as creeks, springs, or wet meadows: Henderson's needlegrass; Wallowa needlegrass; South Fork John Day milk vetch; Bastard kentrophyta; Upward-lobed moonwort; Crenulate moonwort; Botrychium lunaria; Mountain moonwort; Twin-spiked moonwort; Peck's mariposa lily; Lesser panicled sedge; Idaho sedge; Slender sedge; Retorse sedge; Bolander's spikerush; Least rush; Ochoco lomatium; Northern adderstongue; Rafinesque's pondweed; Wolf's willow; Arrowleaf thelypody; Lesser bladderwort; Richardson's calliargon moss; Star campylium moss; Great mountain flapwort; Schistidium moss; Pinkstink dung moss; Mucronleaf tortula moss; and Little brownwort. Plant trampling by European cattle is typically indiscriminate and concentrated in vulnerable riparian areas. The Sunflower allotments are not exceptions to this. Riparian areas in eastern Oregon are concentration centers of high plant and wildlife biodiversity. Declines in less common riparian plants are directly associated with domestic cattle and sheep grazing, as well as with other legacy

mis-management such as road building in riparian areas and intensive heavy logging in riparian areas. The EA analysis acknowledges that the contribution to forage (and plant biodiversity) loss is far higher from the large number of cattle than from wild ungulates and the relatively low number of wild horses combined. Planning to allow continued loss of so many Sensitive plants that are known or suspected to be in the allotments area reflects a disregard for plant biodiversity and the goals of the Endangered Species Act, and a strong agency bias to perpetuate livestock grazing at any cost.” (BMBP comments, pp. 2-3, #4)

Resolution:

Blue Mountains Biodiversity Project has commented on our objection regarding violations of the Endangered Species Act. See our comment quotations and citations in the paragraphs above. Some of the species addressed in this objection have remedies cited under NFMA—MIS and other species viability above, that are also applicable to the ESA violations.

Additional partial resolutions are by species below:

Re: Mid-Columbia Steelhead trout:

*“All pastures that could cause impacts to Mid-Columbia Steelhead trout, apparently including ‘that pasture on Wind Creek’ under permit #05687, North Fork Wind Creek, and Congleton Creek, must either be closed to livestock use entirely or fenced off to completely exclude cattle from the riparian zones in these pastures in order to fully protect Threatened-listed Mid-Columbia Steelhead trout, including their spawning redds, that could be destroyed by excess fine sediment from upstream cattle use or from increased water temperatures due to lack of creek shading from cattle over-grazing, or from direct trampling.” (BMBP comment, p.7, 3rd to last par.)

* “Protection of Steelhead redds in any creek, including North Fork Wind Creek and Congleton Creek should require protection of the redds and the surrounding area by electric fence or complete cattle removal from access for the associated pasture for the entire length of the creek. Steelhead fry and adults can also be harmed by trampling or delivery of excess fine sediment or loss of plant shading in other parts of the creek. It should not be assumed that topography or woody debris will adequately protect the redds, fry, or adult Steelhead or their habitat from cattle impacts.” (BMBP comment, pp. 13-14, last par. to 1st par.)

* Any creek with potential for Steelhead trout spawning should not be grazed until at least July 15th to protect spawning habitat. This is standard on some of the other regional Forests and based on best available science.

Re: Sensitive Redband trout and Columbia Spotted frog and Sensitive riparian plant species:

*Drop all heavy equipment use and related commercial-size logging (aka “non-commercial thinning up to 21” dbh) in potential Columbia Spotted frog habitat and Redband trout habitat stream reaches and within RHCAs in general except for aspen stand restoration or large wood placement-related conifer thinning up to 21” dbh or less, as long as trees contributing to bank stability and primary stream shading are retained. Buffer and protect any Columbia spotted frogs or Sensitive plants found in current or pre-implementation surveys.

* “ The required monitoring outlined on EA pages 26-27 should also be required for pastures without Threatened fish species to prevent loss of Redband trout, Columbia Spotted frog, and riparian functioning in general.” (BMBP comment, p. 14, par. 2)

Re: Gray wolf:

*Retain more good security cover (hiding and thermal) for elk and deer where there is high use by elk and deer, and through dropping thinning suitable in habitat for other density-related species, such as Northern goshawk..

*Gray wolf would most benefit from no livestock grazing in the area, as Gray wolves are most often killed due to conflicts with livestock. Our preferred resolution is to not reauthorize livestock grazing in the Sunflower allotments complex project area. Otherwise, we ask that the rancher permittees are required to use non-lethal means to protect their cattle—especially during calving—if they aren't already doing so. Non-lethal methods for livestock include active herding, use of lights or fladry around vulnerable animals, and immediate proper disposal of any livestock carcasses.

Re: Northern goshawk:

* No commercial-size logging in suitable primary goshawk habitat and PFAs and no non-commercial size thinning (up to 9" dbh) in PFAs and within the nest core 30 acre buffer.

Re: Birds of Conservation Concern and Sensitive-designated butterfly and bumblebee species:

*Most birds of conservation concern and Sensitive butterfly and bumblebee species would best benefit from no livestock grazing (as an EA acknowledged unnatural impact for the ecosystem that is already far beyond the natural range of variability.) If cattle use is reauthorized, cattle should be excluded from riparian zones and wet meadows, as most biodiversity in flowers used by Sensitive butterflies and bumblebees is located in riparian areas. Beyond that protection, cattle should be removed promptly when stubble height limits are reached. These butterfly and bee species and ground-nesting or riparian-associated birds would also be benefitted by shortening the cattle grazing season to exclude the early Spring reproductive season (April through May) and late season cattle use (e.g. in late September and/or October) that tends to remove riparian hardwoods and trample plants into dust, with impacts that carry over into the next grazing season.

We request such shorter grazing seasons for these allotments, which seem to already be happening due to lack of forage re: later fall grazing. Lower numbers of cattle also mean reduced impacts to ground-nesting birds, birds dependent on ground cover for foraging, shrub-nesting birds (particularly in riparian areas), and butterflies and bees dependent on moist meadow flowers or other flowers lost to cattle grazing (particularly in riparian areas.) We are also asking for reduced numbers of cattle more appropriate to the very marginal grazing conditions if grazing is re-authorized.

Re: Sensitive plants:

*"We support beneficial effects to two Sensitive plant populations and 4,011 acres of riparian potential Sensitive plant habitat and to one Sensitive plant population and 8,771 acres of riparian potential Sensitive plant habitat from active riparian restoration if the existing plant populations are located in exclosures or are avoided with heavy machinery, but not at the expense of continued cattle grazing damage after the two year phase-out period (required for No Action). Longer-term continued cattle use of the allotments area equates to continuing unnatural impacts from cattle to Sensitive plant populations and their suitable habitat." (BMBP comment, p. 12, par. 3)

* If cattle grazing is re-authorized, many Sensitive plants may not recover unless there are reduced numbers of cattle and shorter grazing seasons, with cattle excluded from riparian zones and wet meadows. Most Sensitive plants have habitat within riparian zones. Any Sensitive plant populations that are mapped or found during surveys should be made off limits to cattle by temporary fencing or closure of that area to grazing.

*"Ground-disturbing equipment should not be used within the 100 foot buffer around Sensitive plant

populations, with no exceptions unless the equipment is on existing open roads.” (BMBP comment, p. 15, 2nd par.)

IV. The Sunflower Grazing Reauthorization Project Would Violate the Clean Water Act

Examples of our comments regarding water quality and potential violations of the Clean Water Act:

“Water quality and hydrologic flow recovery would also be significantly impeded by continued cattle grazing even with planned adaptive management and limited active riparian restoration.” (BMBP comment, p. 1, par. 1)

“We are opposed to the Forest Service allowing historic livestock ponds to continue to block stream channels. There is no good reason to continue to block stream channels and alter natural flows this way, contrary to the best available science. These livestock ponds look like denuded sewage ponds; they are not something that should be preserved because they are “historic” degradations. A few could be retained which have heavy wildlife use as a stop gap measure pending broader riparian restoration of perennial streams, but these should be prioritized where they are not blocking what used to be a perennial or larger intermittent stream channel. See our survey sheets and photos regarding existing livestock ponds, wildlife sign, wildlife sightings, and our recommendations.” (BMBP comments, p. 14, last par. & p. 15, 1st par.)

Resolution:

*“Most livestock ponds should be decommissioned to allow reconnection of historic stream channel flows. Any livestock ponds retained for wildlife use should have wild life friendly enclosure fencing, native riparian hardwood planting, and water being piped to an outside trough at least 200 to 300 feet outside the riparian area, with no exceptions, for as long as cattle are still on the allotments. Wildlife ramps inside the troughs should be used to prevent rodent and bird deaths. We are strongly opposed to the development of any more springs, livestock ponds, and wells for livestock.” (BMBP comments, p. 15, par. 1)

*Drop all new development of springs, livestock ponds, and wells for livestock. Reconstructing and maintaining existing water developments for livestock should only be done if livestock grazing is reauthorized or for the worst problems that should be corrected for the two years of further livestock use before cattle removal under the No Action alternative. Spring restoration by excluding cattle from springhead riparian zones and moving water sources outside the spring riparian zone should be implemented if grazing is reauthorized or during the two years before cattle removal under the No Action alternative or a modified alternative.

*Drop planned commercial size thinning and heavy equipment use in the RHCAs, except for large wood placement or aspen stand restoration-related conifer thinning up to 18” dbh, which retains all conifers contributing to stream bank stability or primary shading of a stream.

*Drop any planned thinning equipment stream crossings, with our preference being only non-commercial thinning by hand up to 9” dbh.

Inadequate Analysis and Mitigation Regarding Effects to Climate Change

Once again, the Forest Service fails to accept responsibility for their increasing contributions to climate change through the increasing scale and pace of incremental deforestation and carbon storage reduction through repeated timber sales at an accelerated pace and scale, including the nearby planned Black Mountain timber sale, as well as through continued livestock over-grazing. Removing junipers up to 21" dbh as planned for the Sunflower Grazing Reauthorization project is not necessary nor desirable regarding loss of carbon storage. See our related comments below:

"Encouraging the continued grazing of livestock on very marginal and degraded grasslands, when creeks are drying up is not 'promoting stability in communities that depend on range resources.' (EA p. 5) This is especially true with the foreseeable advent of more high temperatures and droughts and more intense wild fires under escalating climate change. Yet the Forest Service fails to analyze climate change effects and their interactions with the existing situation of severe extensive over-grazing, long-term riparian damage, and evidence of what were probably historically perennial creeks drying up. If the cumulative effects of climate change and continued livestock grazing in this area were analyzed in depth, there would be a clear indication that continued livestock grazing authorization is not advisable. Local ranchers are bound to face more and more cut-backs in the grazing season and numbers of cattle that can be supported and other limiting grazing requirements under adaptive management due to increased loss of forage to drought and fires and lack of sufficient water due to drought, high temperatures, and the continued high demand on water by the cattle. This situation can lead to increasing economic loss to the ranchers and eventual abandonment of the allotments, at which point the existing riparian area destruction, loss of plant diversity and abundance, soil impacts, and stress on wildlife populations will be even more intense and much harder to recover and restore." (BMBP comments, pp. 4-5)

"Beyond all this, the cattle also contribute to the severity of climate change effects through both methane gas emissions and depletion of water, loss of water retention, and soil and plant impacts that decrease the viability of wildlife species." (BMBP comment, p. 7, 4th par.)

Resolution:

BMBP has commented regarding Forest Service failure to acknowledge and mitigate their contributions to catastrophic climate change. See our comments quoted and cited above regarding the contribution of the Sunflower project proposed action to climate change.

To resolve this problem, the Forest Service needs to make the following modifications to the Sunflower Grazing Reauthorization project, as suggested in other proposed resolution remedies below:

- * Acknowledge and analyze in depth direct, indirect, and cumulative effects of proposed projects to climate change, including calculating Greenhouse gas emission contributions of planned actions in future planning documents. Global warming (aka climate change) is by definition from cumulative effects that all contribute to the problem. Global warming is now the biggest crisis of our time, threatening the loss of a viable planet for the majority of existing species, including humans, and the loss of fundamental ecological processes that support life. No one is off the hook for accountability to help reduce and slow climate change, especially government agencies.

- * Don't reauthorize livestock grazing (our preference) or significantly decrease the number of cattle allowed on the allotments and shorten the season of use for better water retention and plant recovery.

- * Significantly decrease the intensity of planned cattle use if grazing is reauthorized, including, in addition to planned pasture rotations and adaptive management, complete exclusion of cattle from

perennial creeks and badly damaged intermittent stream channels, as well as from expanded exclosures around springs to account for historic spring riparian zones.

* Retain all large tree structure, including all mature juniper over 9" dbh and all other conifers over 9" dbh with the exception of limited trees up to 18" dbh for tree tipping for riparian restoration. This also helps maintain soil carbon sequestration over time.

*Retain more soil sequestration of carbon and soil water retention by dropping heavy equipment use in areas that would exceed Forest Plan detrimental soil impact standards prior to mitigation, which is often not 100% effective.

Thank you for your consideration of these objections and our proposed resolution remedies. We look forward to meeting with you to work on a resolution to our concerns. Many remedies for resolution were suggested throughout our comments.

Sincerely,



Karen L. Coulter

Karen L. Coulter, Director, Blue Mountains Biodiversity Project
27803 Williams Lane, Fossil, OR 97830
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FENCE OFF EXCEPT FOR WATER GAP AND PLANT RIPARIAN HARDWOODS
AROUND POND.

Recommendations

for allotment location:

FISH PASSAGE BARRIER AT
CURVE ON N. SIDE OF SB, CHANNEL
W. ESTABLISH AS IF MIGHT HAVE BEEN
PERMANENT. TAKE OUT DAM. BLOCKED ENTIRE STREAM.

BREACH DAM OR INSTALL CULVERT TO FACILITATE STREAM
FLOW.
Subjective evaluation of area.

WILDLIFE NEED WATER SOURCES SO CATTLE POND CONSTRUCTION SHOULD
ENSURE DOWNSTREAM FLOW AND FENCED TO EXCLUDE CATTLE EXCEPT AT
WATER GAP. MOST WILDLIFE CONCENTRATED AT POND BUT WILDLIFE AND PLANT DIVERSITY REQUIRE CONTINUED
STREAM FLOW

Type of Allotment Site:

Stream _____ Spring _____ Aspen Stand _____ Other: _____

Stream Conditions:

Overall Description: _____

-Channel: WELL DEFINED ROCKY CHANNEL, CONIFER SHADING

Fine sediment level: SOME FINE SEDIMENT

Width vs. depth ratio: WIDER THAN DEEP, SHALLOW

Bank stability: ERODED

Meander or straight: MEANDER

Size of cobble: MOSTLY SMALL & MED, IN POOL UNDER

Large wood: SMALL DEBRIS JAMS, LARGE DEBRIS JAM

Signs of Livestock damage: _____

Riparian hardwoods: Aspen _____ Alder _____ Red Osier dogwood _____ Willow _____ Rocky Mt. Maple _____

Cottonwood _____ Other: _____

Riparian Plants: _____

Exotic invasive plants: _____

Impoundments/livestock ponds/weirs: _____

Spring Conditions:

Overall Description: _____

Trough _____ Springbox _____ Source Fenced off to cattle? _____

Riparian hardwoods: Aspen _____ Alder _____ Red Osier dogwood ☒ Willow _____ Rocky Mt. Maple _____

Cottonwood _____ Other: _____ ONLY ONE ON DRY SIDE

Riparian Plants: _____

Exotic invasive plants: _____

Signs of Livestock damage: _____

Spring flow/Amount of flow: _____

Trough: Animal escapement device: _____ Pipe into ground for overflow? _____

Distance from Spring headwaters: _____

Extent of fencing around spring: _____

Aspen Stand Conditions:

of live Aspen: _____ # of Aspen snags _____ # of Aspen Logs _____

Young conifer encroachment/shading out of Aspen? From which direction (N/S/E/W)?

Describe: _____

Old growth/Large trees near Aspen? (>= 21" dbh) How many? Distance from Aspen? From what direction (N/S/E/W)?

Describe: _____

Fenced? Condition of fencing, type of fencing? area size fenced, any breaks?

Describe: _____

Aspen sprout condition: Hedged? Height? Estimate # of sprouts. Describe: _____

PC1: SNOWBERRY, ELK SEDGE

TYPICAL WILD ROSE GRACEFUL CINQUEFOIL GRAY'S DESERT PARSLEY, SERVICEBERRY, WESTERN COLUMBINE,
BEDSTRAW, WILLOW

DATE 9-4-20

N.T.L. FOREST OCHOCO

DISTRICT PAULINA?

Grazing Allotment WINDCREEK

Pasture _____

Location Coordinates SECT 6 N of SB

SW of SB 40

Surveyors Names' MIKE & KAREN

S of SB 40780

E of FENCE LINE

WILDLIFE: MALLARD DUCKS, SPARROWS, DRAGONFLIES, GARTER SNAKE, DOUGLAS SQUIRREL, CAT TRACKS (KINK OR BOB CAT) COYOTE, DEER TRACK, WHITE BREASTED NUT HATCH, POSSIBLE COLUMBIA SPOTTED FROG TADPOLE, PYGMY NUT HATCH, STELLAR JAY,
UNUSUAL PLANTS:

Other signs of cattle around the area: Cattle trails, Cattle tracks, Cattle Scat, Cattle present? Describe:
COWPIES AND TRAIL NEXT TO CREEK. CATTLE TRAMPLING OF POND EDGE W/ RECENT COWPIES. NO CATTLE PRESENT

Overgrazing in the area? What plants or shrubs or tree species? Height of hedging? Height of grass or sedge (stubble) in inches? Any stunted shrubs or trees? Areas of bare ground? Describe: HEAVILY OVERGRAZED ALONG STREAM AND

LARGE BARE PATCHES AROUND THE POND. NO RIPARIAN PLANTS OR HARDWOODS EXCEPT FOR 1 WILLOW ON DRY SIDE OF DAM. ONLY SPARSE GRASSES

Photo guidelines: Identify camera used, include photo number/time stamp, include at least a dozen photos per survey, and provide brief description of photo. Have photos highlight the conditions described in the survey form (stubble height, stream channel, trough, fencing, Aspen stand, etc.)

Photo # and description:

948 MAP
948 SURVEY HOG

{ 1051 RED DRAGONFLY
1051

950 CULVERT ON SOUTH SIDE OF SB

1053 VIEW OF STUMPS TO MAKE POND

958 CULVERT ON N. SIDE - FISH PASSAGE

959 OBSTRUCTION
SMALL TO LARGE COBBLE IN CHANNEL
1000 SHALLOW CHANNEL LACKING RIPARIAN PLANTS

1054 GIRDLER JUNIPER

1005 MIKE AND STREAM CHANNEL JAM

1006 ROCKY CHANNEL VIEW

1009 COWPIES & CATTLE TRAIL ALONG BANK

1010 ERODED STREAM BANK

1012 POOL CREATED BY OG PP ROOTS

1013 CHANNEL FILLED W/ SEDIMENT NEAR POND

1014 MASSIVE CATTLE TRAMPLING AROUND POND

1016 VIEW OF DENUDED BANKS OF POND

1017 SMALL FUZZY SWEET SMILING PLANT
TINY YELLOW FLOWERS POSSIBLY ARTEMESIA

1017 RUNNER PLANT W/ TINY PURPLE FLOWERS
POINTED, TRIANGULAR SIMPLE LEAVES W/ MINUTE SERRATIONS

1021 HEAD OF GARTER SNAKE

1021 BODY

↓

1027

1029 CAT TRACKS

↓

1033 DOG TRACKS

1037 DUCK TRACKS

1038 WILLOW ON DRY SIDE OF DAM

1040
1041 SPARROWS DRINKING

↓

1044 CAT PRINTS
1045

1046 COYOTE TRACK

Recommendations
for allotment location:

Blue Mountains Biodiversity Project
27803 Williams Lane
Fossil, OR 97830
(541) 385-9167

DATE 9-4-20

N.T.L. FOREST OCHOCO

DISTRICT PAULINA

Grazing Allotment SUNFLOWER

Pasture _____

Location Coordinates _____ N. of AND ADJ. TO SE

SE OF JUNCTION 58th

5840

Surveyors Names' _____

NE OF FENCING

SE OF

COMPLETELY BREECH DAM AND BANKS
POND LEAVING ORIGINAL STREAM CHANNEL. PUT ROCKS IN RESTORED
REAM COURSE AND PLANT LOCALLY SOURCED WILLOWS ALONG BANKS
BEP CATTLE OUT OF RIPARIAN AREAS.

Subjective evaluation of area:

CURRENT LIVESTOCK PONDS NOT USEFUL FOR CATTLE OR WILDLIFE MIKE & KAREN
AND SHOULD BE BREECH

Type of Allotment Site:

Stream ☒ Spring ☒ Aspen Stand _____ Other: _____

Stream Conditions:

Overall Description: VERY WELL DEGRADED CHANNEL W/ MOSTLY LARGE COBBLE AND WILLOW SPECIES, CURRENTLY DRY.

UNFORTUNATELY DAMMED TO CREATE TWO LIVESTOCK PONDS, BOTH DRY. LACKING OTHER RIPARIAN PLANTS.

ADJING

-Channel: FINE SEDIMENT LIVESTOCK PONDS

Fine sediment level: _____

Width vs. depth ratio: OK IN ORIGINAL CHANNEL

Bank stability: GOOD IN ORIGINAL CHANNEL

Meander or straight: MEANDER

Size of cobble: LARGE & MEDIUM

Large wood: SOME IN ORIGINAL CHANNEL

Signs of Livestock damage: LARGE EXCAVATED LIVE-
STOCK PONDS DESTROYING MID SECTION OF
CREEK CHANNEL.
LIVESTOCK POND IS DRY.

Riparian hardwoods: Aspen _____ Alder _____ Red Osier dogwood ☒ Willow _____ Rocky Mt. Maple _____

Cottonwood _____ Other: _____

Riparian Plants: NONE EXCEPT WILLOW

Exotic invasive plants: BULL THISTLE

Impoundments/livestock ponds/weirs: 2 EXCAVATED LIVESTOCK PONDS, DRY AND BADLY TRAMPLED.
CREEK BED OBLITERATED

Spring Conditions:

Overall Description: _____

Trough _____ Springbox _____ Source Fenced off to cattle? _____

Riparian hardwoods: Aspen _____ Alder _____ Red Osier dogwood _____ Willow _____ Rocky Mt. Maple _____

Cottonwood _____ Other: _____

Riparian Plants: _____

Exotic invasive plants: _____

Signs of Livestock damage: _____

Spring flow/Amount of flow: _____

Trough: Animal escapement device: _____ Pipe into ground for overflow? _____

Distance from Spring headwaters: _____

Extent of fencing around spring: _____

Aspen Stand Conditions:

of live Aspen: _____ # of Aspen snags _____ # of Aspen Logs _____

Young conifer encroachment/shading out of Aspen? From which direction (N/S/E/W)? _____

Describe: _____

Old growth/Large trees near Aspen? (>= 21" dbh) How many? Distance from Aspen? From what direction (N/S/E/W)? _____

Describe: _____

Fenced? Condition of fencing, type of fencing? area size fenced, any breaks? _____

Describe: _____

Aspen sprout condition: Hedged? Height? Estimate # of sprouts. Describe: _____

PLANT COMMUNITY: SNOW BERRY, ELK SEDGE,

TYPICAL: DOGBANE, ARROWLEAF BALSAM ROOT, GOLDENROD OR GRAPE, ASTER, OR. SUNFLOWER, SERVICE BERRY
WILD ROSE, BUNCHGRASS, OR. CHECKERED MAUNDROOT.

DEER TRAILS.

Other signs of cattle around the area: Cattle trails, Cattle tracks, Cattle Scat, Cattle present? Describe: NONE PRESENT.

HEAVY TRAMPLING AROUND DRY LIVESTOCK PONDS

Overgrazing in the area? What plants or shrubs or tree species? Height of hedging? Height of grass or sedge (stubble) in inches? Any stunted shrubs or trees? Areas of bare ground? Describe: EXTENSIVE BARE GROUND AROUND LIVESTOCK PONDS. PATCHY HEDGING OF WILLOWS AND SERVICE BERRY AT ABOUT 20"

Photo guidelines: Identify camera used, include photo number/time stamp, include at least a dozen photos per survey, and provide brief description of photo. Have photos highlight the conditions described in the survey form (stubble height, stream channel, trough, fencing, Aspen stand, etc.)

Photo # and description:

- 1118 MAP
- 1120 MIKE W/ WILLOWS
- 1120 SURVEY HDG.
- 1121 MORE WILLOWS
- 1122 CULVERT ON SOUTH SIDE OF RD
- 1123 HAND SCRABBLE RESERVOIR SIGN
- 1124 ADEQUATE CULVERT
- 1124 CHANNEL W/ MED TO LG COBBLE
- 1126 POSSIBLE SPRING W/ WILLOWS
- 1127 DRY LIVESTOCK POND
- 1128 WELL DEFINED STREAM BED
- 1130 OLD STREAM CHANNEL ON N SIDE OF DAM
- 1130 W/ WILLOW
- 1134 MIKE W/ MULTIPLE WILLOW SPECIES
- 1153 FRILLY, PINATELY COMPOUND, Blue green
leaves Radiating from central stem
6" wide 3" tall

CLASSIC EXAMPLE OF FS NOT MONITORING RIPARIAN RESTORATION PROJECT AND
OR FENCE MAINTENANCE.

Recommendations
for allotment location:

Blue Mountains Biodiversity Project
27803 Williams Lane
Fossil, OR 97830
(541) 385-9167

DATE 9-4-20
NTL FOREST OCHOCO
DISTRICT PAULINA
Grazing Allotment SUNFLOWER

FENCE OFF ENTIRE RIPARIAN AREA

MAINTAIN FENCES AND LOCK THE GATE. REPLANT RED OSIER DOGWOOD AND

WILLOWS AND MONITOR THE ENCLOSURE AND GRAZING. RECONNECT LIVESTOCK

TOUGH OR CANCEL PERMIT FOR ENTIRE PASTURE. ARE PREVIOUS

Subjective evaluation of area: WATER SOURCES IN SUCH DRY FORESTLAND

Pasture
Location Coordinates NE OF 58 W. OF 5800-50
E OF 5800-530

Surveyors Names' MIKE & KAREN NEAR FRAZIER /
LOOK OUT CG

WOULD BE TREATED AS SUCH. STAKES WITHIN SEEP AREA NEXT TO SOME
RED OSIER DOGWOOD AND WILLOWS, ALL BADLY HEDGED, INDICATING POSSIBLE
FAILED RIPARIAN RESTORATION ATTEMPT. ALL DUE TO UNMAINTAINED ENCLOSURE FENCING AND PURPOSEFULLY LEFT OPEN
ENCLOSURE GATES. EXTREME NEGLIGENCE ON PART OF FS.

Type of Allotment Site:

Stream ☒ Spring ☒ Aspen Stand ☐ Other: ☐

Stream Conditions:

Overall Description: SEEP AND APPARENT SPRING IN UNMAINTAINED RIPARIAN ENCLOSURE FENCE W/ OPEN GATES AND

CATTLE SEEN INSIDE - BADLY TRAMPLED AND ERODED STREAM BANK GOOD PLAIN AND SEEP. SEEP HAD APPARENT

-Channel: RIPARIAN HARDWOOD PLANTING ATTEMPT W/ WILLOWS AND RED OSIER DOGWOOD W/ STAKES. HARDWOODS

Fine sediment level: POOR CONDITIONS

Signs of Livestock damage:

Width vs. depth ratio: PROBABLY MORE WIDTH THAN DEPTH

Bank stability: ERODED

Meander or straight: MEANDER

Size of cobble: NONE

Large wood: NONE

RIPARIAN PLANTINGS BADLY HEDGED,
DEAD OR MISSING.

Riparian hardwoods: Aspen ☐ Alder ☐ Red Osier dogwood ☒ Willow ☒ Rocky Mt. Maple ☐

Cottonwood ☐ Other: ☐

Riparian Plants: RIPARIAN SEDGE

Exotic invasive plants: ☐

Impoundments/livestock ponds/weirs: ☐

Spring Conditions:

Overall Description: 2 OBVIOUS SEEPS BUT NO OBVIOUS SPRINGS

Trough ☒ Springbox ☐ Source Fenced off to cattle? YES, BUT NOT MAINTAINED, GATES OPEN AND
CATTLE INSIDE

DRY AND
SIDE RIPARIAN
FENCING W/
TALE INSIDE
ENCLOSURE
FENCING.

Riparian hardwoods: Aspen ☐ Alder ☐ Red Osier dogwood ☐ Willow ☐ Rocky Mt. Maple ☐

Cottonwood ☐ Other: ☐

Riparian Plants: WILLOW, RED OSIER DOGWOOD, RIPARIAN SEDGE, STINKY CURRANT

Exotic invasive plants: ☐

Signs of Livestock damage: ALL ABOVE

Spring flow/Amount of flow: ☐

Trough: Animal escapement device: YES BUT NO WATER Pipe into ground for overflow? YES, BUT NO WATER

Distance from Spring headwaters: N 100'

Extent of fencing around spring: WELL PLANNED, UNMAINTAINED WITH OPEN GATES. MANY BREAKS IN

WATER-SNAKE

Aspen Stand Conditions: FENCING

of live Aspen: ☐ # of Aspen snags ☐ # of Aspen Logs ☐

Young conifer encroachment/shading out of Aspen? From which direction (N/S/E/W)?

Describe: ☐

Old growth/Large trees near Aspen? (>= 21" dbh) How many? Distance from Aspen? From what direction (N/S/E/W)?

Describe: ☐

Fenced? Condition of fencing, type of fencing? area size fenced, any breaks?

Describe: ☐

Aspen sprout condition: Hedged? Height? Estimate # of sprouts. Describe: ☐

PLANT COMMUNITY

RARE: SOAP BERRY

MTN CHICKADEE, CHICKEN SPARROWS, GARTER SNAKE, GROUSE FEATHER, BLUE BIRDS

Other signs of cattle around the area: Cattle trails, Cattle tracks, Cattle Scat, Cattle present? Describe: Yes, All within the EXCLOSURE AREA!

Overgrazing in the area? What plants or shrubs or tree species? Height of hedging? Height of grass or sedge (stubble) in inches? Any stunted shrubs or trees? Areas of bare ground? Describe: EXTREME OVERGRAZING IN RHCA AND in THE UPLAND. TERRIBLY TRAMPLED STREAM BANKS AND FLOOD PLAIN. POST HOLLING IN ERODED STREAM BANKS. EEE

Photo guidelines: Identify camera used, include photo number/time stamp, include at least a dozen photos per survey, and provide brief description of photo. Have photos highlight the conditions described in the survey form (stubble height, stream channel, trough, fencing, Aspen stand, etc.)

Photo # and description:

- | | |
|--|--|
| 1239 EXTREME UPLAND OVERGRAZING | 1353 SEEP W/ OVERGRAZING OF WILLOW AND TRAMPLING |
| ↓ | |
| 1240 | 1359 - BIRDS |
| | 1400 |
| 1240 FRAZIER CG SIGN | 1403 - BIRD |
| 1252 CATTLE RETREATING IN FENCED OF RIPARIAN AREA | 1405 DRIED UP TRAMPLED STREAM BED |
| 1252 FENCED OF RIPARIAN ZONE W/ WILLOWS | |
| 1253 CATTLE TROUGH | |
| <hr/> | |
| 1256 SURVEY HDG | |
| 1300 MAP | |
| 1302 GRAZED LIKE A GOLF COURSE IN RHCA | |
| 1303 RECENT COWPIG ON GOLF COURSE | |
| 1304 (3) PHOTOS OF TERRIBLY TRAMPLED STREAM CHANNEL AND FLOOD PLAIN | |
| ↓ | |
| 1305 OVERGRAZED ALONG | |
| 1309 HEDGING OF RED OSIER DOGWOOD | |
| 1310 WHOLE RED OSIER SHRUB | |
| 1310 WILLOWS W/ ADJ. TRAMPLING | |
| 1312 OPENED RIPARIAN EXCLOSURE GATE | |
| 1313 DOWN AND UNMAINTAINED RIPARIAN EXCLOSURE FENCING | |
| 1313 FRESH COWPIES IN SEEP | |
| 1313 " | |
| 1315 BETTER VIEW OF DOWNED EXCLOSURE FENCE IN SEEP | |
| 1316 HEDGED WILLOWS, IN SEEP AREA | |
| 1316 BADLY HEDGED, APPARENTLY PLANTED, WILLOW AND RED OSIER DOGWOOD WITH STAKES. | |
| ↓ | |
| 1325 | |
| { 1345 TRAMPLED SEEP AREA FURTHER UPSTREAM W/ MIKE | |
| { 1348 | |
| 1350 W/ MIKE OVERGRAZED RIPARIAN ZONE | |
| 1361 OVERGRAZING ON STREAMBANK | |
| 1351 " | |
| 1351 " | |
| 1353 CATTLE TRAILS, COWPIES, BARE GROUND, HEAVY HEDGING ALL INSIDE EXCLOSURE FENCE | |

Recommendations
for allotment location:

TAKE OUT BERM AND
FENCE OFF FROM CATTLE OR
KEEP THEM OUT COMPLETELY,

Blue Mountains Biodiversity Project
27803 Williams Lane
Fossil, OR 97830
(541) 385-9167

DATE 9-4-20
NTL FOREST OCHOCO
DISTRICT PAULINA
Grazing Allotment SUNFLOWER

Pasture _____
Location Coordinates SE OF 5800600
S OF FENCELINE
SW OF FENCELINE
NE OF 58

Subjective evaluation of area: WHOLE ALLOTMENT AREA COMPLETELY
DEVASTATED & DEVASTATED BY OVERLOGGING AND OVERGRAZING KAREN & MIKE
INCLUDING THE UPLAND AREAS.

Surveyors Names' _____

Type of Allotment Site:

Stream ☒ Spring _____ Aspen Stand _____ Other: _____

Stream Conditions:

Overall Description: STREAM BED END IN EXCAVATED LIVESTOCK POND WHICH IS NEARLY DRY
SEASONAL STREAM AT BEST

SHADING -Channel:

CONIFER
SHADING

Fine sediment level: _____
Width vs. depth ratio: MORE WIDTH THAN DEPTH
Bank stability: ERODED BANKS
Meander or straight: MEANDER
Size of cobble: NONE OR LITTLE
Large wood: _____

Signs of Livestock damage:

OVERGRAZING OF BLUE SEDGE TO STUBBLE
POND AREA TRAMPLED

Riparian hardwoods: Aspen _____ Alder _____ Red Osier dogwood _____ Willow JUST 1 ☒ Rocky Mt. Maple _____
Cottonwood _____ Other: _____

Riparian Plants: (4) LONELY WILLOW 1' TALL

Exotic invasive plants: CHEAT GRASS BULL THISTLE

Impoundments/livestock ponds/weirs: DAMMED STREAMBED TO FORM LIVESTOCK POND

Spring Conditions:

Overall Description: N/A

Trough _____ Springbox _____ Source Fenced off to cattle? NO
Riparian hardwoods: Aspen _____ Alder _____ Red Osier dogwood _____ Willow ☒ Rocky Mt. Maple _____
Cottonwood _____ Other: _____
Riparian Plants: (2) 1 FOOT HIGH WILLOW ON BERM
Exotic invasive plants: CHEAT GRASS, BULL THISTLE
Signs of Livestock damage: _____

Spring flow/Amount of flow: _____
Trough: Animal escapement device: _____ Pipe into ground for overflow? _____
Distance from Spring headwaters: _____
Extent of fencing around spring: _____

Aspen Stand Conditions:

of live Aspen: _____ # of Aspen snags _____ # of Aspen Logs _____

Young conifer encroachment/shading out of Aspen? From which direction (N/S/E/W)?

Describe: _____

Old growth/Large trees near Aspen? (≥ 21 " dbh) How many? Distance from Aspen? From what direction (N/S/E/W)?

Describe: _____

Fenced? Condition of fencing, type of fencing? area size fenced, any breaks?

Describe: _____

Aspen sprout condition: Hedged? Height? Estimate # of sprouts. Describe: _____

HORSE SCAT

Other signs of cattle around the area: Cattle trails, Cattle tracks, Cattle Scat, Cattle present? Describe: _____

Overgrazing in the area? What plants or shrubs or tree species? Height of hedging? Height of grass or sedge (stubble) in inches? Any stunted shrubs or trees? Areas of bare ground? Describe: _____

Photo guidelines: Identify camera used, include photo number/time stamp, include at least a dozen photos per survey, and provide brief description of photo. Have photos highlight the conditions described in the survey form (stubble height, stream channel, trough, fencing, Aspen stand, etc.)

Photo # and description:

- 1452 UPSTREAM BANK EROSION
1454 AND BANK BEING GROWN OVER
BY TYPICAL PLANTS
1455 ENTIRE LIVESTOCK POND SHOWING
TRAMPLING, OVERGRAZING AND MIKE FOR
SCALE
1455 CHANNEL MOVED AROUND BERM TO GET
DOWNSTREAM
-
- 1455 (1) WILLOW ON TRAMPLED GROUND ON
BERM
1503 SURVEY HDG
1507 MAP

Recommendations
for allotment location:
*FENCE OFF WITH WATER GAP
PLANT RIPARIAN HARDWOODS OR
GET RID OF BERM*

Blue Mountains Biodiversity Project
27803 Williams Lane
Fossil, OR 97830
(541) 385-9167

DATE *9-4-20*
NTL FOREST *DCHDCD*
DISTRICT *PAULINA*
Grazing Allotment *SUNFLOWER*
Pasture _____
Location Coordinates *NE OF 58
SE OF 5800 600
NW OF 5800 650*
Surveyors Names' *NE OF FENCING*

Subjective evaluation of area: *SINCE THE LIVESTOCK POND IS
NOT DESTROYING A STREAM, THE FS COULD RESTORE IT FOR MIKE & KAREN
WILDLIFE USE*

Type of Allotment Site:
Stream ☒ Spring _____ Aspen Stand _____ Other: _____

Stream Conditions:
Overall Description: *SMALL SEASONAL STREAM*

-Channel:	Signs of Livestock damage:
Fine sediment level: _____	_____
Width vs. depth ratio: _____	_____
Bank stability: _____	_____
Meander or straight: _____	_____
Size of cobble: _____	_____
Large wood: _____	_____

Riparian hardwoods: Aspen _____ Alder _____ Red Osier dogwood _____ Willow _____ Rocky Mt. Maple _____
Cottonwood _____ Other: _____

Riparian Plants: _____

Exotic invasive plants: _____

Impoundments/livestock ponds/weirs: *LIVE STOCK POND, LARGE W/ SOME STANDING WATER, MANY
BABY PACIFIC TREE FROGS, TRAMPLED ALL AROUND, STAGNANT WITH SOME AQUATIC PLANTS BUT NO RIPARIANS*

Spring Conditions: _____

Overall Description: *NONE*

Trough _____ Springbox _____ Source Fenced off to cattle? _____
Riparian hardwoods: Aspen _____ Alder _____ Red Osier dogwood _____ Willow _____ Rocky Mt. Maple _____
Cottonwood _____ Other: _____
Riparian Plants: *NO*
Exotic invasive plants: _____
Signs of Livestock damage: _____

Spring flow/Amount of flow: _____
Trough: Animal escapement device: _____ Pipe into ground for overflow? _____
Distance from Spring headwaters: _____
Extent of fencing around spring: _____

Aspen Stand Conditions:
of live Aspen: _____ # of Aspen snags _____ # of Aspen Logs _____
Young conifer encroachment/shading out of Aspen? From which direction (N/S/E/W)? _____
Describe: _____
Old growth/Large trees near Aspen? (>= 21" dbh) How many? Distance from Aspen? From what direction (N/S/E/W)?
Describe: _____

Fenced? Condition of fencing, type of fencing? area size fenced, any breaks?
Describe: _____
Aspen sprout condition: Hedged? Height? Estimate # of sprouts. Describe: _____

HORSE MANURE, COUGAR, BOBCAT, SHRENMICE, COYOTE, PACIFIC TREE FROGS, ~~DEER~~ TRACK

Other signs of cattle around the area: Cattle trails, Cattle tracks, Cattle Scat, Cattle present? Describe: NONE PRESENT

Overgrazing in the area? What plants or shrubs or tree species? Height of hedging? Height of grass or sedge (stubble) in inches? Any stunted shrubs or trees? Areas of bare ground? Describe: OVERGRAZING OF BUNCH GRASS

Photo guidelines: Identify camera used, include photo number/time stamp, include at least a dozen photos per survey, and provide brief description of photo. Have photos highlight the conditions described in the survey form (stubble height, stream channel, trough, fencing, Aspen stand, etc.)

Photo # and description:

- 1519 OVERVIEW OF BIG LIVESTOCK POND AND OVERGRAZING
- 1520 COUGAR TRACK
- 1520 CLOSER OF LIVESTOCK POND
- 1521 INDISTINCT SEASONAL DRAINAGE NORTH OF BERM
- 1523 POSSIBLE SKUNK TRACKS
- 1523 CLOSE UP OF POSSIBLE SKUNK
- 1524 (3) PHOTO OF PACIFIC TREE FROG ON MIKE
- 1525 POSSIBLE SHRENTACKS W/LONG CLAWS
- 1525 2 POSSIBLE BOBCAT TRACK
- 1525 COYOTE TRACK
- 1527 POSSIBLE MOUSETRACKS
- 1537 GRAZED FESCUE BUNCH GRASS
- 1539 LOCATION ON MAP
- 1539 SURVEY HEADING

Recommendations
for allotment location:

KEEP CATTLE OUT OF UPPER
TRIBUTARIES OF CREEKS.

Blue Mountains Biodiversity Project
27803 Williams Lane
Fossil, OR 97830
(541) 385-9167

DATE 9-4-20
NTL FOREST OCHOCO
DISTRICT PAULINE
Grazing Allotment SUNFLOWER
Pasture _____
Location Coordinates N of 5870 - 150
S of 5870 - 100
Surveyors Names' EX W of 5870

Subjective evaluation of area: BOTH CREEKS APPEAR TO HAVE BEEN
PERENNIAL IN THE PAST. DISTURBED TO SEE THE OVER-GRAZING WHICH
COULD CONTRIBUTE TO DRYING OUT, INCLUDING LACK OF RIPARIAN
PLANTS WEST OF ROAD 5870. KAREN, MIKE

Type of Allotment Site:

Stream ☒ Spring _____ Aspen Stand _____ Other: _____

Stream Conditions:

Overall Description: INTERMITTENT W/ SMALL TO MED. COBBLE. LACKS RIPARIAN PLANTS
BIG CULVERT IN GOOD SHAPE. SUNFLOWER CREEK LARGER, WELL DEFINED ROCKY CHANNEL.
Channel: 2 CULVERTS UNDER RD.

Fine sediment level: OK
Width vs. depth ratio: BAD WIDTH TO DEPTH RATIO
Bank stability: ERODE
Meander or straight: MEANDER
Size of cobble: SMALL TO MED. ON BOTH STREAMS
Large wood: LACKING

Signs of Livestock damage: _____
MIXED STUBBLE HEIGHT HEIGHT NEAR RD
ABOUT 2"

Riparian hardwoods: Aspen _____ Alder _____ Red Osier dogwood ☒ Willow ☒ Rocky Mt. Maple _____
Cottonwood _____ Other: _____
Riparian Plants: WILLOW
Exotic invasive plants: VENTENATA GRASS & YELLOW DOCK
Impoundments/livestock ponds/weirs: _____

Spring Conditions:

Overall Description: _____

Trough _____ Springbox _____ Source Fenced off to cattle? _____
Riparian hardwoods: Aspen _____ Alder _____ Red Osier dogwood _____ Willow ☒ Rocky Mt. Maple _____
Cottonwood _____ Other: _____
Riparian Plants: RIPARIAN SEDGE, WILLOW
Exotic invasive plants: YELLOW DOCK, VENTENATA GRASS
Signs of Livestock damage: _____

Spring flow/Amount of flow: _____
Trough: Animal escapement device: _____ Pipe into ground for overflow? _____
Distance from Spring headwaters: _____
Extent of fencing around spring: _____

Aspen Stand Conditions:

of live Aspen: _____ # of Aspen snags _____ # of Aspen Logs _____
Young conifer encroachment/shading out of Aspen? From which direction (N/S/E/W)? _____
Describe: _____
Old growth/Large trees near Aspen? (>= 21" dbh) How many? Distance from Aspen? From what direction (N/S/E/W)?
Describe: _____

Fenced? Condition of fencing, type of fencing? area size fenced, any breaks?
Describe: _____

Aspen sprout condition: Hedged? Height? Estimate # of sprouts. Describe: _____

R

SAGEBRUSH

JUNIPER
PP

CHECKER SPOT BUTTERFLIES, SKINKS,

Other signs of cattle around the area: Cattle trails, Cattle tracks, Cattle Scat, Cattle present? Describe: PRESENT TO THE EAST

Overgrazing in the area? What plants or shrubs or tree species? Height of hedging? Height of grass or sedge (stubble) in inches? Any stunted shrubs or trees? Areas of bare ground? Describe: SHORT STUBBLE ADJ. TO CREEKS
STUBBLE HEIGHT AS LOW AS 2"

Photo guidelines: Identify camera used, include photo number/time stamp, include at least a dozen photos per survey, and provide brief description of photo. Have photos highlight the conditions described in the survey form (stubble height, stream channel, trough, fencing, Aspen stand, etc.)

Photo # and description:

- 1621 COLUMBUS CRK SIGN ON EAST OF RD
W/ CULVERT AND CHANNEL
- 1621 CULVERT AND BRAIDED STREAM
CHANNEL W/ OF 5870
- 1622 SURVEY HDG
- 1622 CHECKER SPOT BUTTERFLIES ON RABBIT BRUSH
- 16-26
- 1627 SMALL BUTTERFLY
- 1631 WEST ON COLUMBUS CRK. CHANNEL W/ RV
- 1631 GRAZING LEVEL CHANNELS W/ CLIPBOARD
- 1632 LONG WILLOW IN CHANNEL
- 1633 HEAVIER GRAZING TO ABOUT 2" STUBBLE ON
S. SIDE OF CHANNEL
- 1638 SUNFLOWER CRK SIGN AND CHANNEL TO EAST OF 5870
WITH WILLOWS
- 1639 TWO BIG CULVERTS W/ SPLASH POOLS AND SEDIMENT
VIEW FROM EAST
- 1639 TALL WILLOW IN CHANNEL EAST OF 5870
- 1640 - 2 PHOTOS OF CHANNEL WITH WILLOWS
- 1640 - MERGE OF SUNFLOWER AND COLUMBUS CRKS AT FENCE LINE
- 1641 BANK OF WILLOWS OVER MERGED CREEKS
- 1641 PATCHING GRAZING NEXT TO CREEK E. OF 5870 W/ CLIPBOARD
- 1642 MIKE IN CHANNEL TO EAST OF 5870 W/ WILLOWS AND CUT BANKS
- 1643 - TWO CULVERTS ON WEST SIDE OF 5870 W/ BOARD ROCKY CHANNEL
- 1643 BROAD ROCKY CHANNEL UPSTREAM TO WEST OF ROAD W/ OVERGRAZING ON
BOTH SIDES
- 1643 COWPIES IN CHANNEL
- 1644 CHANNEL DISAPPEARS W/ COWPIE AND OVER GRAZING
- 1700 STUBBLE HT AS LOW AS ~~2~~ 2" W/ CLIPBOARD ON
W SIDE OF RD 5870

PILES
AIRY WOODPECKER, NORTHERN FLYCATCHER, BASS, DOWNSY FLYCATCHER, RED BREASTED NUTHATCH
BETTER, GOLDEN MOUNTAIN GROUND SQUIRREL, BLISS, DOWNSY FLYCATCHER, RED BREASTED NUTHATCH
BLISS TRACKS, PYGMY NUTHATCH, MT. BLUEBIRD, PAIR SMALL HAWKS,

Recommendations for allotment location: FENCE OFF W/ WATER GAP & PLANT RIPARIAN HARDWOODS OR CANCEL ALLOTMENT

Blue Mountains Biodiversity Project
27803 Williams Lane
Fossil, OR 97830
(541) 385-9167

DATE 9-5-20
NTL FOREST DOHOCO
DISTRICT PAULINA
Grazing Allotment CANCELLED
Pasture WIND CREEK
Location Coordinates N of 5800-200
EAT END of 5840770

Subjective evaluation of area: POND COULD BE RESTORED TO SERVE SECTION 31 WILDLIFE BECAUSE HAS AT LEAST 4 AQUATIC PLANTS AND MUCH URGENT WILDLIFE USE AS WATER SOURCE. COULD BE GREATLY ENHANCED BY FENCING OFF TO CATTLE W/ WATER GAP AND PLANTING RIPARIAN HARDWOODS. MARGINAL GRAZING LAND AND SHOULD CONSIDER CANCELING ALLOTMENT. WELL IS HUGE SUBSIDY TO PERMITTEES TO PROFIT.

Type of Allotment Site:
Stream ☐ Spring ☐ Aspen Stand ☐ Other: SPRING OR WELL BOX W/ ELECTRIC PUMP

Stream Conditions:
Overall Description: _____

-Channel: N/A

Fine sediment level: _____	Signs of Livestock damage: _____ _____ _____ _____ _____
Width vs. depth ratio: _____	
Bank stability: _____	
Meander or straight: _____	
Size of cobble: _____	
Large wood: _____	

Riparian hardwoods: Aspen ☐ Alder ☐ Red Osier dogwood ☐ Willow ☐ Rocky Mt. Maple ☐
Cottonwood ☐ Other: _____
Riparian Plants: DUCK WEED, RIPARIAN SEDGE
Exotic invasive plants: _____
Impoundments/livestock ponds/weirs: BURNED IMPOUNDMENT SPRING FED FROM UP HILL OR WELL FED

Spring Conditions:
Overall Description: _____

Trough ☐ Springbox ☐ Source Fenced off to cattle? ☐
Riparian hardwoods: Aspen ☐ Alder ☐ Red Osier dogwood ☐ Willow ☐ Rocky Mt. Maple ☐
Cottonwood ☐ Other: _____
Riparian Plants: RIAPARIAN SEDGE, + AQUATICS I.E. DUCK WEED
Exotic invasive plants: BULL THISTLE, VENTENATA GRASS
Signs of Livestock damage: TRAMPLING, BARREN GROUND, POSTHOLE AND OVER GRAZING

Spring flow/Amount of flow: _____
Trough: Animal escapement device: _____ Pipe into ground for overflow? ☐
Distance from Spring headwaters: _____
Extent of fencing around spring: _____

Aspen Stand Conditions:
of live Aspen: _____ # of Aspen snags _____ # of Aspen Logs _____
Young conifer encroachment/shading out of Aspen? From which direction (N/S/E/W)? _____
Describe: _____
Old growth/Large trees near Aspen? (>= 21" dbh) How many? Distance from Aspen? From what direction (N/S/E/W)? _____
Describe: _____

Fenced? Condition of fencing, type of fencing? area size fenced, any breaks? _____
Describe: _____
Aspen sprout condition: Hedged? Height? Estimate # of sprouts. Describe: _____

1" and JUNIPER w/ SNAGS, MOSTLY JUNIPER.

Other signs of cattle around the area: Cattle trails, Cattle tracks, Cattle Scat, Cattle present? Describe: Yes, Present

Overgrazing in the area? What plants or shrubs or tree species? Height of hedging? Height of grass or sedge (stubble) in inches? Any stunted shrubs or trees? Areas of bare ground? Describe: EXTENSIVE OVERGRAZING

Photo guidelines: Identify camera used, include photo number/time stamp, include at least a dozen photos per survey, and provide brief description of photo. Have photos highlight the conditions described in the survey form (stubble height, stream channel, trough, fencing, Aspen stand, etc.)

Photo # and description:

- 852 2 BULLS AT LWESTOCK POND
- 853 VIEW OF POND w/ MIKE & TRAMPLED POND EDGE
- 854 WEASEL FAMILY TRACK
- 855 DOG OR COYOTE TRACK
- 856 BIRD TRACKS IN MUD
- 857 MAP
- 858 SURVEY HEADINGS
- 903 AQUATIC PLANTS, DUCK WEED

- 905 TRAMPLED SHORELINE AROUND POND
- 905 TRAMPLED AND GRAZED RIPARIAN SEDGES
- 906 GOLDEN MANTLE GROUND SQUIRREL
- 907 " " " "
- 912 HOSE TO POND FROM SPRING HOUSE UP THE HILL
- 913 EXTENT OF TRAMPING TO UPHILL SIDE
- 913 EXTENT OF OVERGRAZING
- 914 SHORT STUBBLE, MOSTLY BARE GROUND 1-2" STUBBLE
- 916 BOBCAT TRACKS
- 917 " "
- 918 2 PHOTOS OF AQUATIC PLANTS
- 921 WEASEL FAMILY TRACK
- 922 DUCK TRACKS
- 923 BOB CAT TRACKS
- 924 VIEW ACROSS POND w/ MIKE
- 927 RIPARIAN SEDGES IN WATER, GRAZED
- 925 BOBCAT TRACK
- 935 BLUE BIRDS
- ↓
- 937
- 940 2 PICTURES OF OVERGRAZING BEYOND BERM TO WEST
- 940 " "
- 951 WELL BOX

BLACK BIRD IN CATTAILS,

Recommendations for allotment location: **YES. FENCE IT OFF AND ANT NATIVE HARDWOODS AND RIPARIAN WTS. CAN PROVIDE WATER GAP BUT KEEP CATTLE AWAY 'DM BANKS**

Blue Mountains Biodiversity Project
27803 Williams Lane
Fossil, OR 97830
(541) 385-9167

DATE 9-5-20
NTL FOREST OCHOCO
DISTRICT PAULINA
Grazing Allotment WIND RIVER

Pasture _____
Location Coordinates E of 5840
W of 5850
BELOW N. SECTION LINE
W & NW of 5850-020
SW of 5850-100

Subjective evaluation of area: **UNFORTUNATE SPRING BECAME LIVESTOCK POND, SO NOW THE FS SHOULD TRY TO RESTORE BIO-DIVERSITY IN THE AREA BY LOWERING AND LEVELING TOP OF BERM LIKE WILLOWS AND RED OSIER DOGWOOD AND USING WILDLIFE FRIENDLY FENCING W/ WATER GAP FOR LIVESTOCK ACCESS. FS SHOULD ALSO PLANT NATIVE FORBS AND NATIVE GRASSES TO COMPETE W/ VENTENATA GRASS.**

Type of Allotment Site:
Stream _____ Spring ☒ Aspen Stand _____ Other: _____

Stream Conditions:

Overall Description: _____

Channel:

Fine sediment level: _____
Width vs. depth ratio: _____
Bank stability: _____
Meander or straight: _____
Size of cobble: _____
Large wood: _____

Signs of Livestock damage:

Riparian hardwoods: Aspen _____ Alder _____ Red Osier dogwood _____ Willow ☒ Rocky Mt. Maple _____
Cottonwood _____ Other: CATTAILS

Riparian Plants: _____

Exotic invasive plants: BULL THISTLE, VENTENATA GRASS

Impoundments/livestock ponds/weirs: LIVESTOCK POND

Spring Conditions:

Overall Description: SPRING CONVERTED TO LS POND

Trough _____ Springbox _____ Source Fenced off to cattle? NO
Riparian hardwoods: Aspen _____ Alder _____ Red Osier dogwood _____ Willow ☒ Rocky Mt. Maple _____

Cottonwood _____ Other: CATTAILS

Riparian Plants: WILLOW, CATTAIL

Exotic invasive plants: _____
Signs of Livestock damage: TRAMPLING, SCAT, BARE GROUND, OVERGRAZING, STUBBLE HEIGHT FROM DOWN TO 2" TO BARE GROUND.

Spring flow/Amount of flow: _____

Trough: Animal escapement device: _____ Pipe into ground for overflow? _____

Distance from Spring headwaters: _____

Extent of fencing around spring: _____

Aspen Stand Conditions:

of live Aspen: _____ # of Aspen snags _____ # of Aspen Logs _____

Young conifer encroachment/shading out of Aspen? From which direction (N/S/E/W)? _____

Describe: _____

Old growth/Large trees near Aspen? (>= 21" dbh) How many? Distance from Aspen? From what direction (N/S/E/W)? _____

Describe: _____

Fenced? Condition of fencing, type of fencing? area size fenced, any breaks? _____

Describe: _____

Aspen sprout condition: Hedged? Height? Estimate # of sprouts. Describe: _____

RECREATION: HUNTERS CAMP ADS. AND OCCUPIED RV ON SITE

Other signs of cattle around the area: Cattle trails, Cattle tracks, Cattle Scat, Cattle present? Describe: _____

Overgrazing in the area? What plants or shrubs or tree species? Height of hedging? Height of grass or sedge (stubble) in inches? Any stunted shrubs or trees? Areas of bare ground? Describe: LOW STUBBLE HEIGHT, PONDEROSA PINE & JUNIPER PRESENT

Photo guidelines: Identify camera used, include photo number/time stamp, include at least a dozen photos per survey, and provide brief description of photo. Have photos highlight the conditions described in the survey form (stubble height, stream channel, trough, fencing, Aspen stand, etc.)

Photo # and description:

- 1036 SURVEY HEADING
- 1036 MAP
- 1017 LIVESTOCK POND W/ HEAVY TRAMPING AROUND EDGES AND BARE GROUND. SHOWS SOME AQUATIC PLANTS. NONE OTHERS THAN WILLOWS AND CATTAILS. MOST OF PERIMETER IS BARREN
- 1017 ALGAE & DUCKWEED WITH BARE GROUND
- 1017 CATTAILS AND BARE GROUND LEADING TO WATER EDGE WITH TRAMPING AND WILLOWS TO RT
- 1018 WILLOWS W/ BARE GROUND
- 1018 MORE WILLOWS & CATTAILS W/ BARE GROUND ON BERM
- 1020 CATTLE TRAIL LEADING TO LIVESTOCK POND
- 1021 OVERGRAZING IN SURROUNDING AREA
- 1021 BARREN GROUND FROM OVERGRAZING IN MEADOW
- 1022 OVERGRAZING IN MEADOW
- 1022 VENTENATA GRASS IN MEADOW

RABBITRUSIT

Recommendations
for allotment location:

Blue Mountains Biodiversity Project

27803 Williams Lane

Fossil, OR 97830

(541) 385-9167

DATE 9-5-20

NTL FOREST OCHOCO

DISTRICT PAULINA

Grazing Allotment WINDCREEK ALLOTMENT

Pasture

Location Coordinates W. OF 5850 AND FENCELINE

SW CORNER OF SECTION

N OF 5850 - 150

Surveyors Names' SW OF 5850 - 400

MIKE & KAREN NW OF 5850 - 140

Subjective evaluation of area: VERY CRUDE IMPOUNDMENT DESIGN

THIS IS HOW FS DESTROYS BIO-DIVERSITY W/ LIVE STOCK

Type of Allotment Site:

Stream ☐ Spring ☒ Aspen Stand ☐ Other: ☐

Stream Conditions:

Overall Description: ☐

-Channel:

Fine sediment level: ☐

Width vs. depth ratio: ☐

Bank stability: ☐

Meander or straight: ☐

Size of cobble: ☐

Large wood: ☐

Signs of Livestock damage: ☐

Riparian hardwoods: Aspen ☐ Alder ☐ Red Osier dogwood ☐ Willow ☐ Rocky Mt. Maple ☐

Cottonwood ☐ Other: ☐

Riparian Plants: ☐

Exotic invasive plants: ☐

Impoundments/livestock ponds/weirs: ☐

Spring Conditions:

Overall Description: SEE LIKE DEPRESSION IN EXCAVATED HOLE WITH RUSHES (FEW), BROWSED AND TRAMPLED, NO RIPARIAN PLANTS AROUND WATER HOLE, WILLOWS (SMALL) ON SIDE OF BERM

Trough ☐ Springbox ☐ Source Fenced off to cattle? NO

Riparian hardwoods: Aspen ☐ Alder ☐ Red Osier dogwood ☐ Willow SMALL Rocky Mt. Maple ☐

Cottonwood ☐ Other: ☐

Riparian Plants: RUSHES, SMALL WILLOWS

Exotic invasive plants: YELLOW DOCK

Signs of Livestock damage: TRAMPLING, OVER GRAZING

Spring flow/Amount of flow: VERY LOW WATER LEVEL

Trough: Animal escapement device: ☐ Pipe into ground for overflow? ☐

Distance from Spring headwaters: ☐

Extent of fencing around spring: NONE

Aspen Stand Conditions:

of live Aspen: ☐ # of Aspen snags ☐ # of Aspen Logs ☐

Young conifer encroachment/shading out of Aspen? From which direction (N/S/E/W)?

Describe: ☐

Old growth/Large trees near Aspen? (>= 21" dbh) How many? Distance from Aspen? From what direction (N/S/E/W)

Describe: ☐

Fenced? Condition of fencing, type of fencing? area size fenced, any breaks?

Describe: ☐

Aspen sprout condition: Hedged? Height? Estimate # of sprouts. Describe: ☐

ELK TRACKS, 12 SPOT VIOLETS, PLEASANT, WOOD TRAIL, WOOD OF DEER - SKINIMENTS, GARTER SNAKE

Other signs of cattle around the area: Cattle trails, Cattle tracks, Cattle Scat, Cattle present? Describe: NO COWS PRESENT
TRAMPLING, BARE GROUND, COWPIES

Overgrazing in the area? What plants or shrubs or tree species? Height of hedging? Height of grass or sedge (stubble) in inches? Any stunted shrubs or trees? Areas of bare ground? Describe: FEW WILLOWS ON DRYER PART of EXCAVATION. SMALL. OVERGRAZING ALL AROUND

Photo guidelines: Identify camera used, include photo number/time stamp, include at least a dozen photos per survey, and provide brief description of photo. Have photos highlight the conditions described in the survey form (stubble height, stream channel, trough, fencing, Aspen stand, etc.)

Photo # and description:

- 1058 MAP
- 1058 SURVEY HDG
- 1059 EXCAVATED LIVESTOCK POND
- 1100 REMAINING WATER WITH OVERGRAZING
- 1101 FENCE POSTS AND CAMPFIRE RINGS
- 1102 CATTLE TRAMPLING IN RUSHES
- 1103 COWPIES ON RUSHES " "
- 1104 GARTER SNAKE
- ↓
- 1106 DEER TRACK
- 1109 DRAGONFLIE MATING DEBGY VIDEO & STILLS
- 1113
- 1114 VIDEO
- 1115 VIDEO
- 1116 STILLs

YELLOW JACKETS

* RED BAND TROUT ARE A SENSITIVE SPECIES AND A MANAGEMENT INDICATOR SPECIES FOR THIS FOREST AND MUST BE PROTECTED FROM CATTLE!

Recommendations

for allotment location:

DO NOT RENEW FOR THIS

PSURE OR FENCE OFF ALL

SHEDDING CREEKS TO CATTLE W/ WILDLIFE FRIENDLY FENCE AND REPLANT RIPARIAN HARDWOODS

Subjective evaluation of area:

THIS WOULD BE A LOVELY SPOT IF NOT FOR MIKE & KAREN THE CATTLE PRESENCE. WE ARE CONCERNED THAT THERE ARE RED-BAND TROUT FRY IN THIS CREEK AND NO PROTECTION FROM CATTLE

Type of Allotment Site:

Stream ☒ Spring ☐ Aspen Stand ☐ Other: ☐

Stream Conditions:

Overall Description: MEANDERING, SHALLOW WITH NOT MUCH FLOW. COBBLE SMALL TO LARGE

Channel:

Fine sediment level: ☐
Width vs. depth ratio: BAD
Bank stability: SLUMPING, BARREN, ERODING
Meander or straight: MEANDER
Size of cobble: SMALL TO LARGE
Large wood: ☐

Signs of Livestock damage: SLUMPING BANKS, LACK OF RIPARIAN PLANTS, LACK OF SUCCESS IN REPLANTING I.E. EMPTY CAGES, COMPIES IN STREAM, HOOF SHEARING, OVER-GRAZING ALL AROUND, BULL THISTLE INFESTATION

Riparian hardwoods: Aspen ☐ Alder ☒ Red Osier dogwood ☐ Willow ☐ Rocky Mt. Maple ☐

Cottonwood ☐ Other: ☐

Riparian Plants: CREEPING CHARLIE, ALDER, SWAMP GOOSEBERRY

Exotic invasive plants: BULL THISTLE

Impoundments/livestock ponds/weirs: NO

Spring Conditions:

Overall Description:

Trough ☐ Springbox ☐ Source Fenced off to cattle? ☐

Riparian hardwoods: Aspen ☐ Alder ☐ Red Osier dogwood ☐ Willow ☐ Rocky Mt. Maple ☐

Cottonwood ☐ Other: ☐

Riparian Plants: ☐

Exotic invasive plants: MULLEIN, BULL THISTLE,

Signs of Livestock damage: ☐

Spring flow/Amount of flow:

Trough: Animal escapement device: ☐ Pipe into ground for overflow? ☐

Distance from Spring headwaters: ☐

Extent of fencing around spring: ☐

Aspen Stand Conditions:

of live Aspen: ☐ # of Aspen snags ☐ # of Aspen Logs ☐

Young conifer encroachment/shading out of Aspen? From which direction (N/S/E/W)?

Describe: ☐

Old growth/Large trees near Aspen? (>= 21" dbh) How many? Distance from Aspen? From what direction (N/S/E/W)?

Describe: ☐

Fenced? Condition of fencing, type of fencing? area size fenced, any breaks?

Describe: ☐

Aspen sprout condition: Hedged? Height? Estimate # of sprouts. Describe: ☐

* UPSTREAM SIDE OF CULVERT UNDER 5850

DATE 9-5-20

NITL FOREST OCHOCHO

DISTRICT PAULINA

Grazing Allotment WIND CREEK

Pasture N. FORK "SQUAW CREEK"

Location Coordinates CREEK CROSSES 5850

5850 - 400 ADJ TO CREEK TO NE AN

Surveyors Names' ~~SEAN & KAREN~~

AND SE OF THE CULVERT

5850-400 ADJ TO

NE BUT NW OF THE

CULVERT

ALSO IN SW CORNER OF

THE SECTION

SWAMP GOOSEBERRY

Other signs of cattle around the area: Cattle trails, Cattle tracks, Cattle Scat, ^{NO} Cattle present? Describe: _____

Overgrazing in the area? What plants or shrubs or tree species? Height of hedging? Height of grass or sedge (stubble) in inches? Any stunted shrubs or trees? Areas of bare ground? Describe: _____

BARE GROUND, VIRTUALLY NO STUBBLE ALL AROUND THE CREEK

Photo guidelines: Identify camera used, include photo number/time stamp, include at least a dozen photos per survey, and provide brief description of photo. Have photos highlight the conditions described in the survey form (stubble height, stream channel, trough, fencing, Aspen stand, etc.)

Photo # and description:

1148 GARTER SNAKE IN CREEK
1205

1205 LIKELY RED BANDED TROUT FRY

1207 " " " " "

1214 CADDIS FLIES IN STREAM w/ WATER SPIDER
12-16

1218 CREEPING CHARLIE, RIPARIAN PLANT

1219 NW END OF CULVERT w/ ALDER AND EMPTY CAGE

1219 CLOSE UP of Alder

1219 LOOKING NWN UPSTREAM TO ANOTHER ALDER
AND SLUMPING N. BANK OF STREAM w/ mule

1219 MIKE w/ SURVEY SHEET AND STAND OF BULL THISTLE
BEHIND

1220 - SLUMPING, BARREN BANKS OVER CREEK

1221 " " "

1221 CATTLE TRAIL AND BARREN GROUND AND OVERGRAZING
UPSTREAM

1221 Trampling of stream bank w/ cowpies and hoof shearing

1221 BROAD ROCKY CHANNEL UPSTREAM, VERY LITTLE WATER
TERRIBLE WIDTH TO DEPTH RATIO

1226 ON RD 5850 SHOWS TRUCK AND CULVERT

1246 COWPIE IN WATER

1249 SLUMPING BANK MOVING INTO STREAM

Recommendations
for allotment location:

Blue Mountains Biodiversity Project

27803 Williams Lane

Fossil, OR 97830

(541) 385-9167

DATE

9-5-20

NTL FOREST

OCHOCO

DISTRICT

PAULINA

Grazing Allotment

WIND CREEK

Pasture

SQUAW CREEK SE OF CULVER

Location Coordinates

IN ROAD 5850

Surveyors Names

S & E OF FENCE LINE

Surveyors Names

S of 5850-550

Surveyors Names

N of 5850-401

HEALTHY CONDITIONS FOR NATIVE SPECIES

Subjective evaluation of area: THE FENCE LINE EXPOSURE SHOWS THAT

EVERYTHING NOT IN EXPOSURE WILL BE DESTROYED BY CATTLE. SINCE

FS WILL NEVER FENCE RIPARIAN AREAS THE ONLY WAY FORWARD

IS TO CANCEL THE ALLOTMENT. THE RIPARIAN ECOSYSTEMS WILL NEVER REACH HEALTHY HISTORIC CONDITIONS WITH

GETTING RID OF THE CATTLE. ALL OF THE FOREST'S CREEKS SHOULD LOOK LIKE THIS EXPOSURE.

Type of Allotment Site:

Stream ☒ Spring ☐ Aspen Stand ☐ Other: ☐

Stream Conditions:

Overall Description: CLOSE TO OR AT REFERENCE CONDITION BECAUSE OF EXPOSURE FENCE AND

RESTORATION EFFORT INCLUDING LARGE WOOD PLACEMENT

-Channel:

Fine sediment level: OK

Width vs. depth ratio: GOOD

Bank stability: GOOD

Meander or straight: MEANDER

Size of cobble: SMALL TO LARGE

Large wood: YES 2 AND MANY IN RESTORATION PROJECT

Signs of Livestock damage:

NONE INSIDE EXPOSURE FENCE!

Riparian hardwoods: Aspen ☐ Alder ☐ Red Osier dogwood ☐ Willow ☐ Rocky Mt. Maple ☐

Cottonwood ☐ Other: ☐

Riparian Plants: NETTLES, MUDWORT, MINT, CREEPING CHARLIE, RIPARIAN SEDGE (2 KINDS) SCOURING RUB

Exotic invasive plants: BULL THISTLE

Impoundments/livestock ponds/weirs: ☐

Spring Conditions:

Overall Description:

Trough ☐ Springbox ☐ Source Fenced off to cattle? ☐

Riparian hardwoods: Aspen ☐ Alder ☐ Red Osier dogwood ☐ Willow ☐ Rocky Mt. Maple ☐

Cottonwood ☐ Other: ☐

Riparian Plants: ☐

Exotic invasive plants: SHEPHERDS PURSE, BULL THISTLE

Signs of Livestock damage: ☐

Spring flow/Amount of flow:

Trough: Animal escapement device: ☐ Pipe into ground for overflow? ☐

Distance from Spring headwaters: ☐

Extent of fencing around spring: ☐

Aspen Stand Conditions:

of live Aspen: ☐ # of Aspen snags ☐ # of Aspen Logs ☐

Young conifer encroachment/shading out of Aspen? From which direction (N/S/E/W)?

Describe:

Old growth/Large trees near Aspen? (>= 21" dbh) How many? Distance from Aspen? From what direction (N/S/E/W)?

Describe:

Fenced? Condition of fencing, type of fencing? area size fenced, any breaks?

Describe:

Aspen sprout condition: Hedged? Height? Estimate # of sprouts. Describe:

WILD ROSE, CA. FALSE HELLEBORE, MIMULUS GUTTATUS, SCOURING RUSH
MINT, GRACEFUL CINQUE FOIL, NETTLE, CURLY DOCK, BEDSTRAW, THIN LEAF LUPIN

PLANT COMMUNITY: SNOWBERRY

Other signs of cattle around the area: Cattle trails, Cattle tracks, Cattle Scat, Cattle present? Describe: _____

Overgrazing in the area? What plants or shrubs or tree species? Height of hedging? Height of grass or sedge (stubble) in inches? Any stunted shrubs or trees? Areas of bare ground? Describe: _____

Photo guidelines: Identify camera used, include photo number/time stamp, include at least a dozen photos per survey, and provide brief description of photo. Have photos highlight the conditions described in the survey form (stubble height, stream channel, trough, fencing, Aspen stand, etc.)

Photo # and description:

1311 SURVEY HDG

1311 MAP

1312 MIKE W/CULVERT, FENCE AND DRY CREEK BED W/WILLOWS

1313 FENCE LINE DIFFERENCE SE OF FENCING TALL GRASS

NW OF FENCE SHORT STUBBLE

1315 SHOW GAP BELOW FENCE

1315

1315

1357 PICTURE OF POOL W/LOG

1400 MIKE THINKING BEHIND ALDER

1400 → 1402 RED BAND TROUT

1402 POOL PIC

1318 CULVERT W/ NETTLES, MINT MUGWORT

1322 WILLOW PLANTS IN CHANNEL

1324 MEADOW NOT GRAZED RECENTLY

1324

1324 WAIST HIGH GRASSES

1325 ELK BEDS IN GRASS

1334 DRY DF 68.7

1335 UPTURN ↑

1336 MIKE AT BASE OF DF

1338 HORNET NEST IN MEADOW

1339 TALL WILLOWS IN CHANNEL

1340 SINGLE ALDER

1340 VIEW OF BROAD CREEK CHANNEL WITH MINT, CREEPING CHARLIE AND WILLOWS

1343 TALL GRASS

1344 WATER W/ WILLOW AND RIPARIAN SEDGE

1345 RIPARIAN SEDGE SHORTER W/ SEED HEADS

1346 RIPARIAN SEDGE LARGER ELONGATED SEEDHEADS

1348 WATER, LARGE WOOD RIPARIAN SEDGE, WILLOWS & ALDER

1350 TALL ALDERS

1351 MIKE W/ WILLOWS & ALDERS

1352-2 LOGS IN FLOOD PLAIN W/ WATER AND RIPARIAN SEDGE

1352 3 LOGS PLACED IN FLOOD PLAIN W/ RIPARIAN SEDGE WITH WILLOWS

1353 MIKE WALKING TIEROPE

1355 ANOTHER SEDGE W/ DIFF. SEEDHEAD

1409 ANOTHER POOL W/ LARGE WOOD.

1411 UNIDENTIFIED RED CLOVER

1412 "

1413 "

1414 FENCE LINE DIFFERENCES BETWEEN WITHIN & W/O EXCLOSURES

1415

1415 MIKE WITHIN EXCLOSURE ON LARGE WOOD

1416 ERODED BARREN BANK ABOVE CREEK OUTSIDE EXCLOSURE

1416 SAME ↑

1416 CREEK W/ NO RIPARIAN PLANTS EXCEPT CREEPING CHARLIE

1416 STRAIGHT ACROSS FENCE LINE DIFFERENCE

1418 AT FENCE, LOOKING INSIDE EXCLOSURE

1418 LOOKING ACROSS FENCE OUTSIDE EXCLOSURE AT CREEK CHANNEL

1426 DRAGON FLIES

1427 ALDER DRAGON FLIES

1448 SCOURING RUSH W/ LOGS

1448 CULVERT UNDER S850

1445 TROUT IN POOL

1447 " " "

1448 BLUE DRAGONFLY

1449 " "

1450 " "

1451 " "

CULVERT UNDER RD 41
OTHER SIDE OF CULVERT
HEAVILY TRAMPLED STREAM
W/ OVERGRAZED RIPARIAN
VEGETATION W/ COWPATS

Recommendations
for allotment location:

CANCEL ALLOTMENT OR
FENCE OFF AND RESTORE
CREEK. PLANT HARDWOODS IN FLOOD PLAIN ONLY IF CATTLE
ARE KEPT OUT.

Blue Mountains Biodiversity Project
27803 Williams Lane
Fossil, OR 97830
(541) 385-9167

DATE 9-5-20
NTL FOREST OCHOCO
DISTRICT PAULINA
Grazing Allotment WIND CREEK

Pasture
Location Coordinates W of 5840
N of FENCE LINE
NE of 5830-661
SE of 5830-600
N of 5830
Surveyors Names
MIKE EKAREN

Subjective evaluation of area: CREEK BED NOT WELL DEFINED SO UNCLEAR
WHY IT'S NOT A PERENNIAL CREEK. I WOULD TO KNOW
WHETHER CREEK WAS HISTORICALLY PERENNIAL

Type of Allotment Site:

Stream ☒ Spring ☐ Aspen Stand ☐ Other: ☐

Stream Conditions:

Overall Description: DRY W/O OBVIOUS REASON BASED ON SIZE AND DEFINITION OF CHANNEL

-Channel:

Fine sediment level: HIGH
Width vs. depth ratio: MAIN CHANNEL FAIR
Bank stability: MOSTLY ERODED
Meander or straight: MEANDER
Size of cobble: SMALL TO MEDIUM
Large wood: NOT MUCH BUT SNAGS WILL BE FALLING SOON

Signs of Livestock damage:
OVERGRABING BOTH SIDES OF CREEK
AND BETWEEN CHANNELS, SLUMPING BANKS,
COMPIES.
HEAVY SEDIMENT LOAD AND LACKING
RIPARIAN PLANTS

Riparian hardwoods: Aspen ☐ Alder ☐ Red Osier dogwood ☐ Willow ☐ Rocky Mt. Maple ☐

Cottonwood ☐ Other: ☐

Riparian Plants: WILLOW

Exotic invasive plants: BULL THISTLE

Impoundments/livestock ponds/weirs: ☐

Spring Conditions:

Overall Description: ☐

Trough ☐ Springbox ☐ Source Fenced off to cattle? ☐

Riparian hardwoods: Aspen ☐ Alder ☐ Red Osier dogwood ☐ Willow ☐ Rocky Mt. Maple ☐

Cottonwood ☐ Other: ☐

Riparian Plants: ☐

Exotic invasive plants: ☐

Signs of Livestock damage: ☐

Spring flow/Amount of flow: ☐

Trough: Animal escapement device: ☐ Pipe into ground for overflow? ☐

Distance from Spring headwaters: ☐

Extent of fencing around spring: ☐

Aspen Stand Conditions:

of live Aspen: ☐ # of Aspen snags ☐ # of Aspen Logs ☐

Young conifer encroachment/shading out of Aspen? From which direction (N/S/E/W)?

Describe: ☐

Old growth/Large trees near Aspen? (>= 21" dbh) How many? Distance from Aspen? From what direction (N/S/E/W)?

Describe: ☐

Fenced? Condition of fencing, type of fencing? area size fenced, any breaks?

Describe: ☐

Aspen sprout condition: Hedged? Height? Estimate # of sprouts. Describe: ☐

ELK SCAT, HARY WOODPECKER, WEASEL PRINTS? BOBCAT TRACKS, MOUSE/SHREW TRACKS
BOBCAT SCAT

PLANT COMMUNITY: SNOW BERRY

Other signs of cattle around the area: Cattle trails, Cattle tracks, Cattle Scat, Cattle present? Describe: NO

Overgrazing in the area? What plants or shrubs or tree species? Height of hedging? Height of grass or sedge (stubble) in inches? Any stunted shrubs or trees? Areas of bare ground? Describe:

PP GF DF JUNIPER SNOWBERRY BEING HEDGED (SEE PHOTO)

Photo guidelines: Identify camera used, include photo number/time stamp, include at least a dozen photos per survey, and provide brief description of photo. Have photos highlight the conditions described in the survey form (stubble height, stream channel, trough, fencing, Aspen stand, etc.)

Photo # and description:

1541 SURVEY HDG

1541 MAP

1550 CREEK BED AT FENCE LINE
VERY WIDE W/ COBBLE

1550 BIG MEANDERING BED W/ COBBLE
1550 " " "

1551 CREEK BED & FOREST

1551 " " "

1552 MIKE AT BEND IN CREEK BED

1553 OVERGRAZING NEXT TO CREEK

1554 BARE GROUND OVERGRAZED W/ COW PIES
AWAY FROM CREEK

1558 PARTIALLY OVERGROWN W/ TYPICAL PLANTS
W/ BIG MEANDER & TREE ROOT POOLS

1559 ERODED BANK

1600 VERY ERODED BANK W/ OVERGRAZING

1601 DEEP POOL IN UNDERCUT BANK

1601 HEAVY SEDIMENT ERODING INTO CREEK BED
1602 BIG MEANDER W/ ROOT WAD CAUSING POOL
W/ LARGE COBBLE

1603 MEANDER W/ UNDERCUT BANK BUT TOO
MUCH FINE SEDIMENT

1604 LARGE WOOD IN CHANNEL

1605 SLUMPED BANK

1606 BIG CHANNEL MEANDER W/ CONIFER SHADING PP, DF, GF

1608 DOWNSTREAM OF LOG DEBRIS JAM

1608 UPSTREAM DEBRIS JAM HOLDING BIG AMT OF SEDIMENT

1610 SNAGS LIKELY TO ADD TO LARGE WOOD IN CREEK CHANNEL

1611 MAIN CHANNEL

1612 SIDE CHANNEL

1613 BARE GROUND WITH SHORT STUBBLE HEIGHT
BETWEEN CHANNEL. COW PIES

1614 COBBLE IN SIDE CHANNEL

1625 STUBBLE HEIGHT RIGHT NEXT TO ~~STREAM~~
STREAM BED OF SECONDARY CHANNEL
1625 OTHER SIDE OF BANK OF SECONDARY
CHANNEL

1626 EXTREMELY SHORT STUBBLE HEIGHT
NEXT TO MAIN CHANNEL

1627 BULL THISTLE RIGHT NEXT TO MAIN
STREAM CHANNEL

1628 "

1630 SNOWBERRY ON STREAM BANK
HEDGED

1630 HEDGED SNOWBERRY

1634 LIVESTOCK POND, TRAMPUGED
POSTHoled, BARE GROUND, OVER
GRAZED

1635 OTHER END OF POND
SAME AS ABOVE

1635 SEWAGE-LIKE WATER

1639 BOBCAT PRINT

1640 " " "

1642 LONG TOED PRINT

1643 COYOTE TRACK

1644 MIKE AT POND

1645 MIKE W/ HEAVY OVERGRAZE
ABOVE POND

Recommendations
for allotment location:

Blue Mountains Biodiversity Project

27803 Williams Lane

Fossil, OR 97830

(541) 385-9167

DATE 9-4-20

NFL FOREST OCHOCO

DISTRICT PAULINA

Grazing Allotment SUNFLOWER

Pasture COUGAR CREEK

Location Coordinates W OF 58-800

N AND S OF RD 806

S OF 58

Surveyors Names

MIKE & KAREN

Subjective evaluation of area: CATTLE DAMAGE SO EXTENSIVE AS TO

REQUIRE WELL-MAINTAINED FENCE AROUND ENTIRE DRAINAGE AND

RIPARIAN PLANTED TO REPAIR AND STABILIZE THE BANKS. EXTREME RIPARIAN

DAMAGE INDICATION OF LONG TERM

PARIAN HARDWOODS. FS NEGLIGENCE.

Type of Allotment Site:

Stream ☒ Spring ☐ Aspen Stand ☐ Other: SHEEP ON WEST SIDE OF STREAM NORTH OF 806

Stream Conditions:

Overall Description: MEANDERING, DRY, SEVERELY UNDERCUT & DOWNCUT BANKS. BANKS SLUMPING INTO

CHANNEL EXTENSIVELY

-Channel:

Fine sediment level: BAD

Width vs. depth ratio: VARIES DUE TO SLUMPING

Bank stability: VERY BAD

Meander or straight: MEANDER

Size of cobble: SMALL TO LARGE

Large wood: LITTLE

Signs of Livestock damage:

Riparian hardwoods: Aspen ☐ Alder ☐ Red Osier dogwood ☐ Willow ☒ Rocky Mt. Maple ☐

Cottonwood ☐ Other: ☐

Riparian Plants: FEW WILLOWS AND MINT

Exotic invasive plants: BULL THISTLE, VENTENATA GRASS

Impoundments/livestock ponds/weirs: NONE

Spring Conditions:

Overall Description:

Trough ☐ Springbox ☐ Source Fenced off to cattle? ☐

Riparian hardwoods: Aspen ☐ Alder ☐ Red Osier dogwood ☐ Willow ☐ Rocky Mt. Maple ☐

Cottonwood ☐ Other: ☐

Riparian Plants: MINT, WILLOW

Exotic invasive plants: BULL THISTLE

Signs of Livestock damage:

Spring flow/Amount of flow:

Trough: Animal escapement device: ☐ Pipe into ground for overflow? ☐

Distance from Spring headwaters:

Extent of fencing around spring:

Aspen Stand Conditions:

of live Aspen: ☐ # of Aspen snags ☐ # of Aspen Logs ☐

Young conifer encroachment/shading out of Aspen? From which direction (N/S/E/W)?

Describe:

Old growth/Large trees near Aspen? (≥ 21 " dbh) How many? Distance from Aspen? From what direction (N/S/E/W)?

Describe:

Fenced? Condition of fencing, type of fencing? area size fenced, any breaks?

Describe:

Aspen sprout condition: Hedged? Height? Estimate # of sprouts. Describe:

SAGEBRUSH, MINT, DANDELION, WILD ROSE, WAX CURRANT

Other signs of cattle around the area: Cattle trails, Cattle tracks, Cattle scat, Cattle present? Describe: _____

DOWNCUTTING OF BANK, CATTLE TRAIL NEXT TO CREEK

Overgrazing in the area? What plants or shrubs or tree species? Height of hedging? Height of grass or sedge (stubble) in inches? Any stunted shrubs or trees? Areas of bare ground? Describe: STUBBLE ALL AROUND THE CHANNEL LESS THAN 1". WILLOWS PRESENT (FEW) ARE HEAVILY HEDGED

Photo guidelines: Identify camera used, include photo number/time stamp, include at least a dozen photos per survey, and provide brief description of photo. Have photos highlight the conditions described in the survey form (stubble height, stream channel, trough, fencing, Aspen stand, etc.)

Photo # and description:

1719 SURVEY HDG

1720 MAP

1720 OVERGRAZED CONDITIONS N. of 806

1721 STUBBLE HT AND COMPIE. STUBBLE 1" or less.

1722 FISH PASSAGE BARRIER IE. CULVERT TOO HIGH

1723 DOWNCUTTING OF STREAM CHANNEL TO N of 806

1725 INTENSE OVERGRAZING W/LOTS of COMPIE N of 806

1726 CATTLE TRAMPLED STREAM BED

1726 ERODED STREAM BANKS AND OVERGRAZING

1727 DOWNCUT BANK, MEANDERING ROCKY CHANNEL AND OVERGRAZING

1732 OVERGRAZING W/CLIPBOARD

1733 FENCE LINE DIFFERENCE VISIBLE

1734 LEFT SIDE OF FENCE LESS GRAZED MEADOW TO NORTH

1734 THRU FENCE N. TO LESS GRAZED MEADOW

1741 S. OF ROAD 806 EXTREME OVERGRAZING W/CLIPBOARD IN DISTANCE

1741 CLOSE SHOWING HOW SHORT stubble is

1742 CULVERT & OVERGRAZING

1743 ROCK MEANDERING CHANNEL W/ OVERGRAZING

1744 MEANDERING CHANNEL W/ SLUMPING BANKS AND OVERGRAZING

1745 STUNTED, BROWSED WILL 2.5' HIGH

1746 STUNTED WILLOW IN CREEK CHANNEL

1746 SLUMPING BANK AND OVERGROWN CHANNEL

1747 MEANDERING WITH DOWNCUT BANKS W/ SEDIMENT LOADING

1748 CLOSE UP OF SEDIMENT LOADING

1749 MEANDERING CHANNEL W/ SLUMPING BANKS AND EXCESS

1749 "

1749 "

1752 CONTINUED OVERGRAZING & DOWNCUT BANKS

1753 BANK COLLAPSING INTO CHANNEL

1753 BROWSED WILLOW 5' HIGH

1755 MIKE POINTING OUT SEDIMENT LOADING & OVERGRAZING COMPIE

1806 OG PP ADJ. TO CREEK

project

DATE 9-5-20
NTL FOREST OCHO CO
DISTRICT PAULINA
Grazing Allotment WIND CREEK

Pasture

Location Coordinates W of 5890
N of FENCING
NE of 5830-661

Surveyors Names

MIKE & KAREN E of 5830-600
N of 5830

09/05/2020 15:41

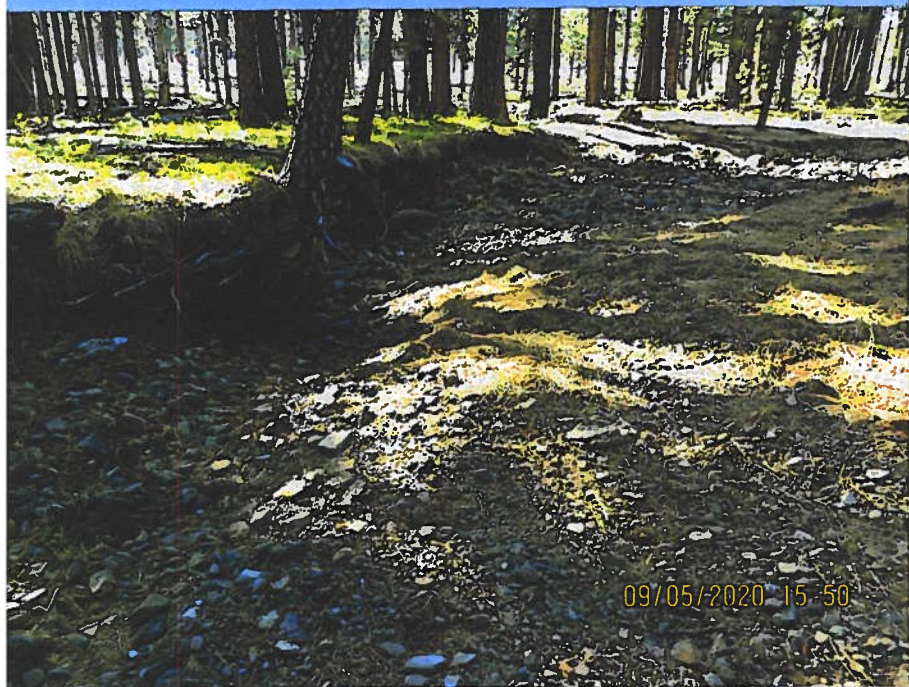


15:52 → Mike at bend of large creek bed - entire vicinity is overgrazed by cattle

Recommendation: Cancel the allotment or fence off and restore creek - and other riparian areas. Plant hardwoods in flood plain only if cattle are kept out.

Subjective evaluation: The creek bed is big and well-defined, so it's unclear why it's not a perennial creek. I would like to know whether the creek was historically perennial.

09/05/2020 15:50



15:50 → big meandering creek bed with cobble - strangely dry

DATE 9-4-20
 NTL FOREST OCHOCO
 DISTRICT PAULINA
 Grazing Allotment SUNFLOWER
 Pasture _____
 Location Coordinates SE OF 5800600
S OF FENCELINE
SW OF FENCELINE
NE OF 58
 Surveyors Names
NG KAREN L. MILLS

09/04/2020 15:03



Recommendation: Take out the livestock pond berm and fence off from cattle or keep them out completely.

Subjective evaluation: The whole allotment area is completely devastated by overlogging and overgrazing, including the upland areas.

Riparian conditions: The stream bed ends in an excavated livestock pond which is nearly dry - with a seasonal stream at best. Stream conditions: channel: conifer shading, bad width-to-depth ratio (wider than deep), eroded stream banks, meandering channel with little or no cobble. Riparian plants: one lonely 1 foot tall willow. The stream was dammed to form the livestock pond, eliminating downstream flow.

14:55 - a view of the livestock pond showing cattle trampling, overgrazing throughout the broader area



Sunflower
allotment-
SE of 5800-600
S & SW of fence-
line, NE of 58
Paulina
District,
Ochoco
National
Forest

09/04/2020 14:55



09/04/2020 14:54

14:54⁺ The stream bank being grown-
over by typical upland plants as
the stream banks erode

Livestock damage:

Overgrazing of elk's edge to short stubble, pond area
heavily trampled, with compacted soils, dammed
stream channel blocking downstream flow for livestock
pond, only one riparian hardwood (1 willow) and no
other riparian plants, invasive plants: cheatgrass
and Bull thistle

09/04/2020 14:52

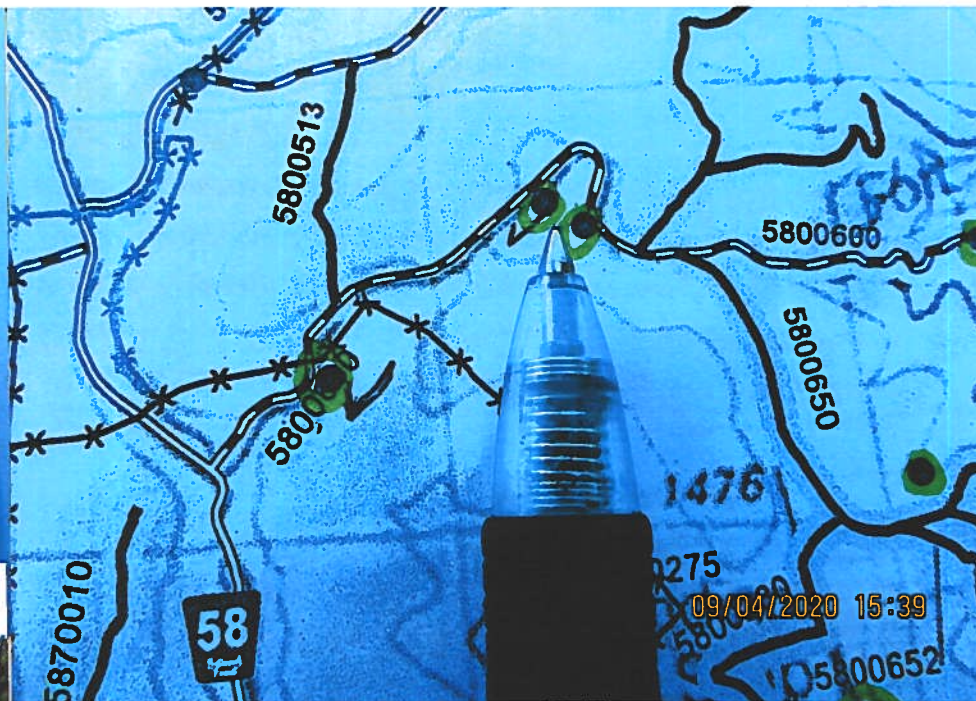


14:55⁺ The stream channel moved around the berm to flow
downstream
14:52⁺ upstream bank erosion



DATE 9-4-20
NTL FOREST OCHO
DISTRICT PAULINA
Grazing Allotment SUNFLOWER
Pasture _____
Location Coordinates NE OF 58
SE OF 5800 600
NW OF 5800 650
Surveyors Names' NE OF FENCELINE
MIKE & KAREN

09/04/2020 15:39



09/04/2020 15:39



09/04/2020 15:19

15:19 View of livestock pond with overgrazing all around it.

Recommendation:

Fence off the area around the livestock pond with a water gap if the allotment is reauthorized. Plant riparian hardwoods and/or get rid of the berm.

Subjective evaluation:

Since the livestock pond is not destroying a stream, the Forest Service could restore it for wildlife use.

Riparian conditions: a small seasonal stream and a large livestock pond with some standing water with many young tree frags; trampled all around, stagnant with some aquatic plants but no riparian hardwoods.



Junifer
allotment -
NE of 58 rd.
SE of 5800-600
NW of 5800-650
NE of fence line
Paulina District
Ochoco
National
Forest

09/04/2020 15:20

15:20 → closer view of cattle trampling and overgrazing
15:20 → an apparent cougar track, based on size, shape, no claw prints



09/04/2020 15:20



09/04/2020 15:21

15:21 → an indistinct seasonal drainage
north of the berm - grown over channel

Livestock damage: cattle trampling around pond,
overgrazing throughout the broader area, cattle tracks,
cattle scat, overgrazing of bunch grass - no cattle present.



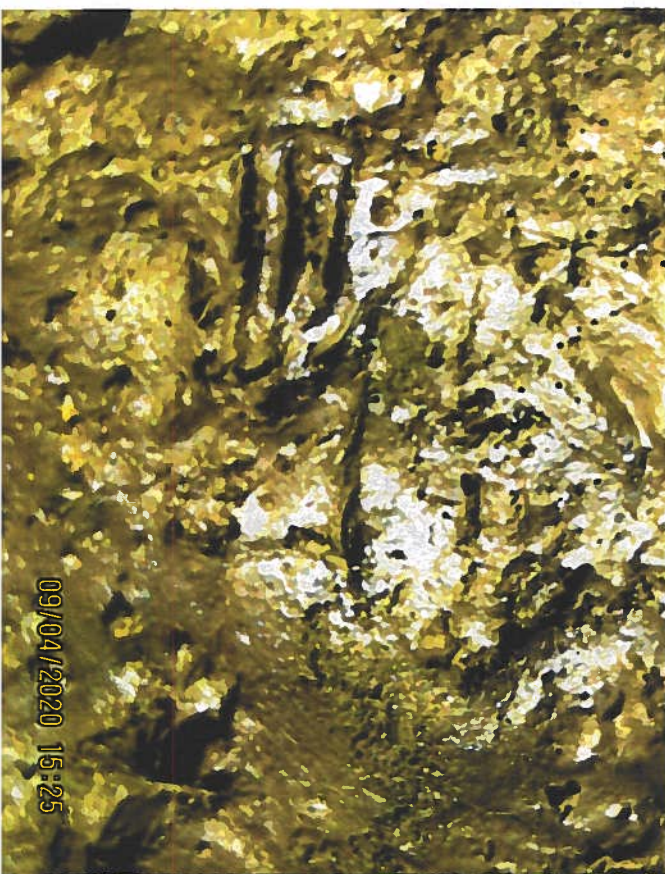
Wildlife sign:
many young Pacific tree frogs,
horse manure, cougar tracks
bobcat tracks, shrew/mice
tracks, likely skunk tracks,
deer tracks

15:24 ↑ a young Pacific ~~fisher~~ tree frog on Mike's arm

Sunflower allotment - livestock pond at NE of rd 58, SE of 5800-600, NW of 5800-650, & NE of fence line
Paulina Ranger District, Ochoco National Forest

15:23 ↓ possible skunk tracks by the livestock pond 15:23 ↓ close-up of a possible skunk track





09/04/2020 16:25

Sunflower
allotment-
NE of 58 rd.,
SE of 5800-600,
NW of 5800-650,
NE of fence line
Paulina
Ranger District,
Ochoco
National
Forest

15:25 possible
shrew tracks
with long
claws



15:25
a likely
coyote track



15:37 → Grazed bunchgrass

15:27 → possible mouse tracks by the livestock pond



09/04/2020 15:27

DATE 9-4-20
NTL FOREST DCHOCO
DISTRICT PAULINE
Grazing Allotment SUNFLOWER
Pasture _____
Location Coordinates N of 5870 - 150
S of 5870 - 100
Surveyors Names' W of 5870
KAREN, MIKE

09/04/2020 16:22

Recommendation: Keep cattle out of upper tributaries of creeks as well as out of main creek channels.

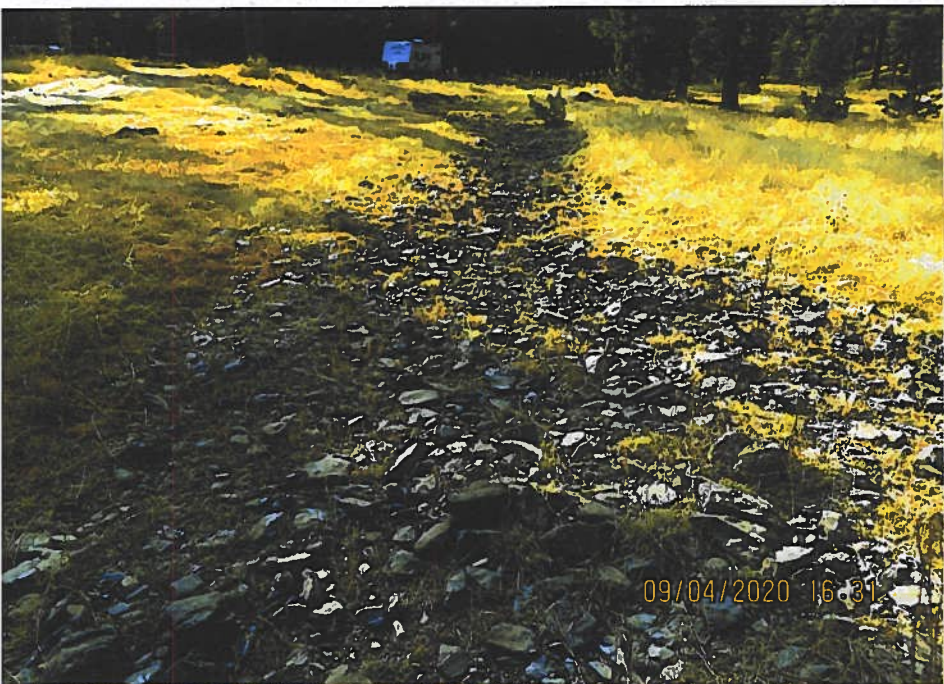
16:21² Culvert & braided stream channel west of 5870 rd. with overgrazing, no riparian plants



16:21² Columbus Creek east of rd with culvert and barren, exposed channel with no riparian plants

Subjective evaluation: Both creeks appear to have been perennial in the past. It's disturbing to see the overgrazing which could contribute to the creeks drying out, such as through lack of riparian hardwoods to stabilize creek banks and shade the creek, aiding in water retention.

Riparian conditions: Overall description: Intermittent creeks with small to medium cobble, lacking riparian plants in stretches, big culverts in good shape. Sunflower Creek is larger, well defined rocky channel - 2 culverts under the road. Fine sediment level - o.k., bad width-to-depth ratio; eroded banks, meandering channel; lacking large wood; limited willows and riparian sedges; mixed stubble height - height near road about 2 inches.

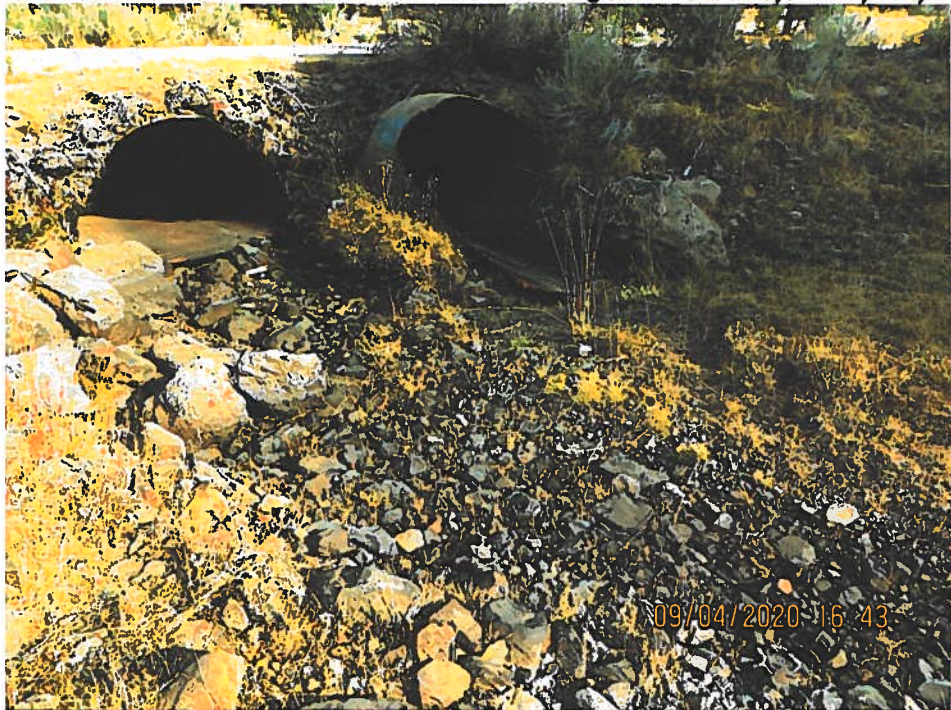


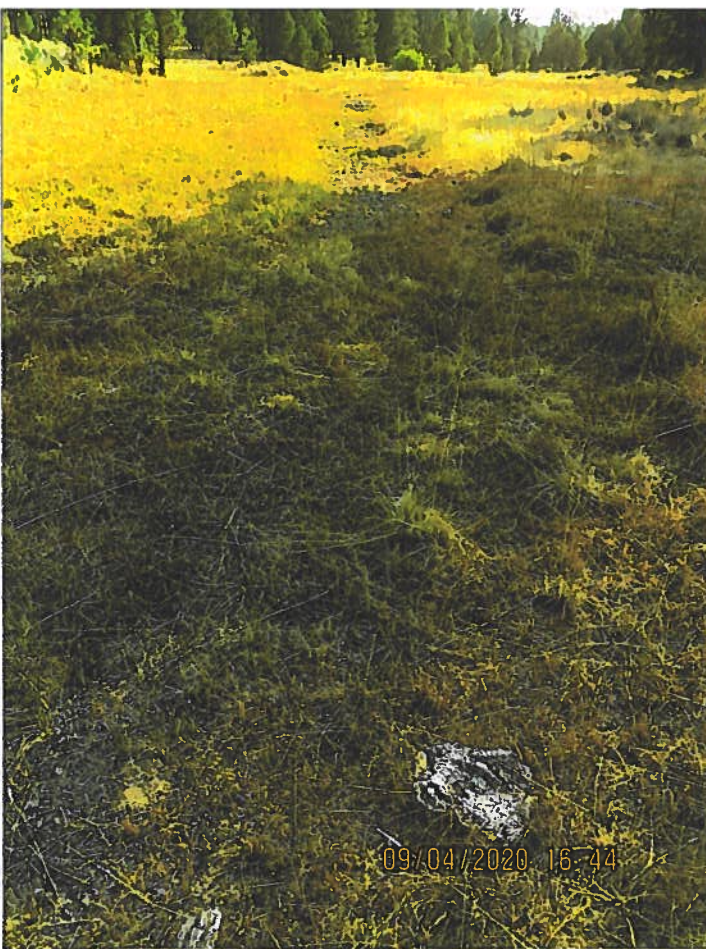
16:31 → west on Columbus Creek - overgrazed, lacking riparian plants 16:38 → channel to East of 58°70' w/ willows Sunflower way
 with RV-campers. 16:33 → Heavier grazing to about 2" stubble on South side of channel 16:31 → higher stubble N of 150, S of 100
 Paulina Rd Ochoco NF allotment 58°70'





16:39 Two big culverts with splash pools & sediment - view from East
 E of 5870 - Sunflower allotment - W of 5870, N of 150, S of 100 Paulina RD Ochoco NF
 16:43 Same two culverts on West side of 5870 - completely dry. 16:42 Mike in channel to East of 5870 w/ willows & eroded banks





16:44 → The creek channel disappears upstream, overgrown with over-grazing and cowpies

16:43 → broad rocky channel upstream (downstream of view above at 16:44) to west of road 5870 with overgrazing on both sides



16:39 → Tall willow in channel East of 5870

Sunflower allotment
North of 5870-150, S. of 5870-10
East & West of 5870
Paulina Ranger District
Ochoco National Forest

As with other creeks in the Sunflower & Wind Creek allotments, the headwater tributaries of Columbus Creek and Sunflower Creek appear to be drying up due to overgrazing by cattle and loss of most riparian hardwoods and destabilization of the creek banks. Both creek channels look like they used to be perennial in this area.

DATE 9-5-20

NIL FOREST JOHOCO

DISTRICT PAULINA

Grazing Allotment ~~SENECA~~

Pasture WIND CREEK

Location Coordinates N of 5800-200

SECTION 31 WEST END of 5840770

Surveyors Names

MIKE & KAREN

09/05/2020 08:58



09/05/2020 08:53

Recommendation: Fence off a broader area around the livestock pond with a water gap for cattle, if they are authorized, and plant riparian hardwoods or cancel the allotment.



Subjective evaluation: The pond could be restored to serve wildlife because it at least has four aquatic plants and much current wildlife use as a water source. The site could be greatly enhanced by fencing it off to cattle with only a water gap for livestock water access and planting riparian hardwoods. This is very marginal grazing land, so the Forest Service should consider cancelling this allotment. The well pump is a huge subsidy to permittees for their private profit.

Wildlife use: a Hairy woodpecker heard & seen, a Northern Flicker, a Mallard ducks, coyote tracks, Dragon flies, a possible weasel track, a Kestrel, Damselflies, a possible weasel track, a Golden mantled ground squirrel, Bobcat tracks, a Pygmy nuthatch, Redbreasted nuthatch Mountain bluebirds drinking, a pair of small hawks—obviously this is a critical water source for local wildlife.



7:05⁺ Trampled banks of the livestock pond with cattle tracks
 7:55⁺ Dog or coyote tracks in the pond mud

8:52⁺ Two bulls on the dammed livestock pond berm



Riparian Conditions: a spring or well box with an electric pump; a bermed impoundment, spring or well fed from uphill; riparian plants: duckweed, riparian sedge, riparian sedge is in the water - overgrazed and mostly absent outside of the water. Invasive plants: Ventenata grass & Bull Thistle.

Livestock damage: trampling, barren ground, potholing, extensive overgrazing, cattle trails, cattle tracks, cattle scat, two bulls present.

Sunflower-Wind Creek allotment - North of 5800-200 road, at end of 5840-770 road, Section 31.

Paulina Ranger District
 Ochooco National Forest



09/05/2020 09:13



09/05/2020 09:51

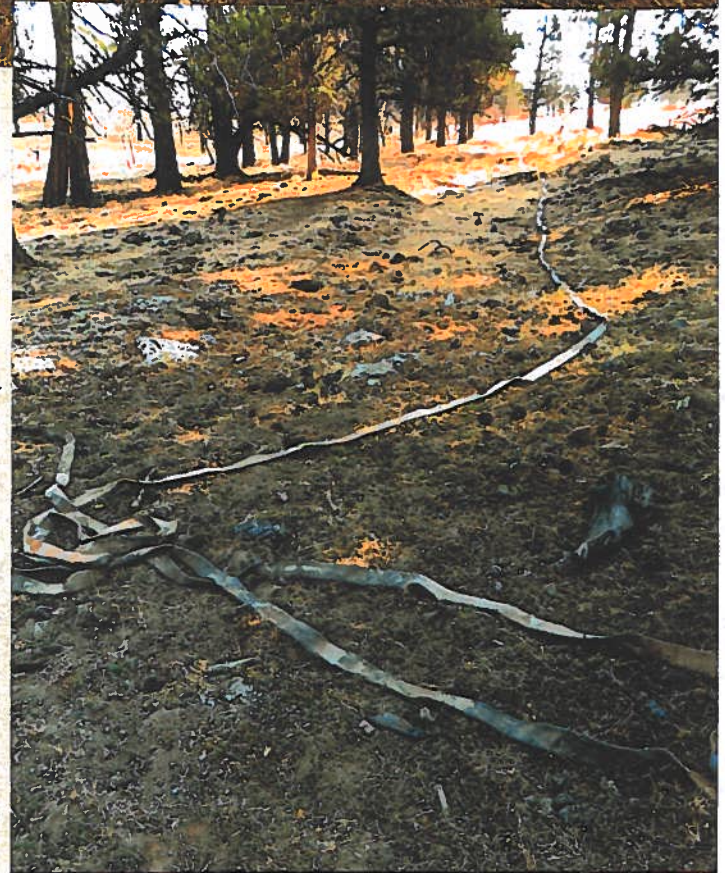
9:13 → greater extent of overgrazing uphill from the pond
 9:06 → a Goldenmantled ground squirrel near the pond



09/05/2020 09:06

9:51 → well or
 spring box with
 electric pump
 9:12 → hose
 extending from
 the uphill pump
 downhill to the
 upper end of the
 pond

Sunflower-
 Wind Creek
 allotment-
 section 31,
 N. of 5800-200
 at end of 5840-
 770 road
~~Prairie~~ Paulina
 District,
 Ochoco Natl
 Forest



Sunflower-Wind Creek Autometer - section 51, north of
5800-200 road, at end of the 5840-770 road
Paulina Ranger District, Ochoco National Forest

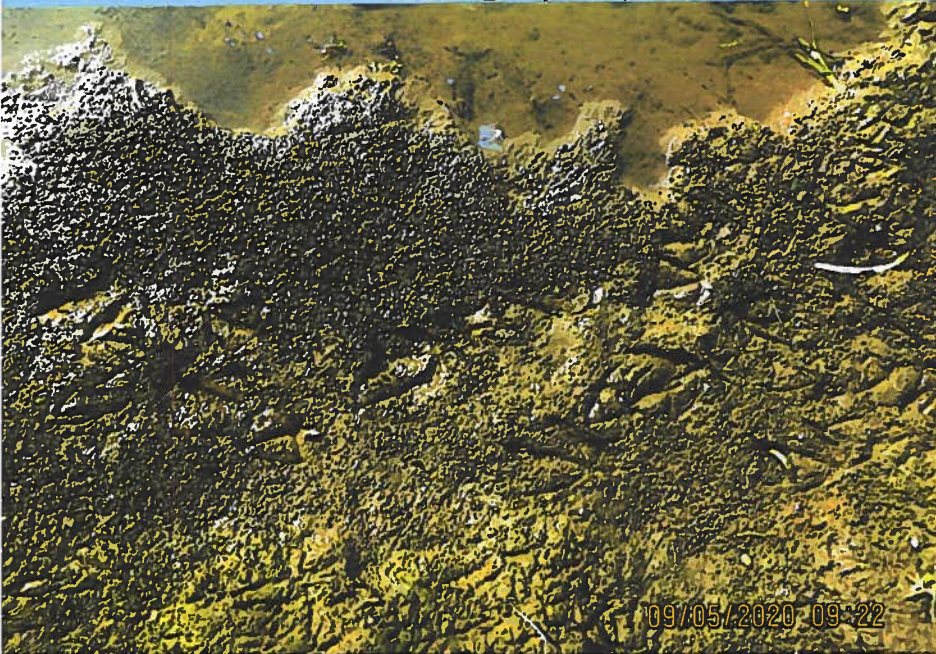
9:17 - a likely Bobcat track by the pond
9:21 (bottom) - track from a member of the weasel family



09/05/2020 09:37

9:37 - Mountain Bluebirds drinking at the livestock pond

9:22 - Duck tracks at the edge of the pond



09/05/2020 09:22



09/05/2020 09:17

09/05/2020 09:21



09/05/2020 09:13



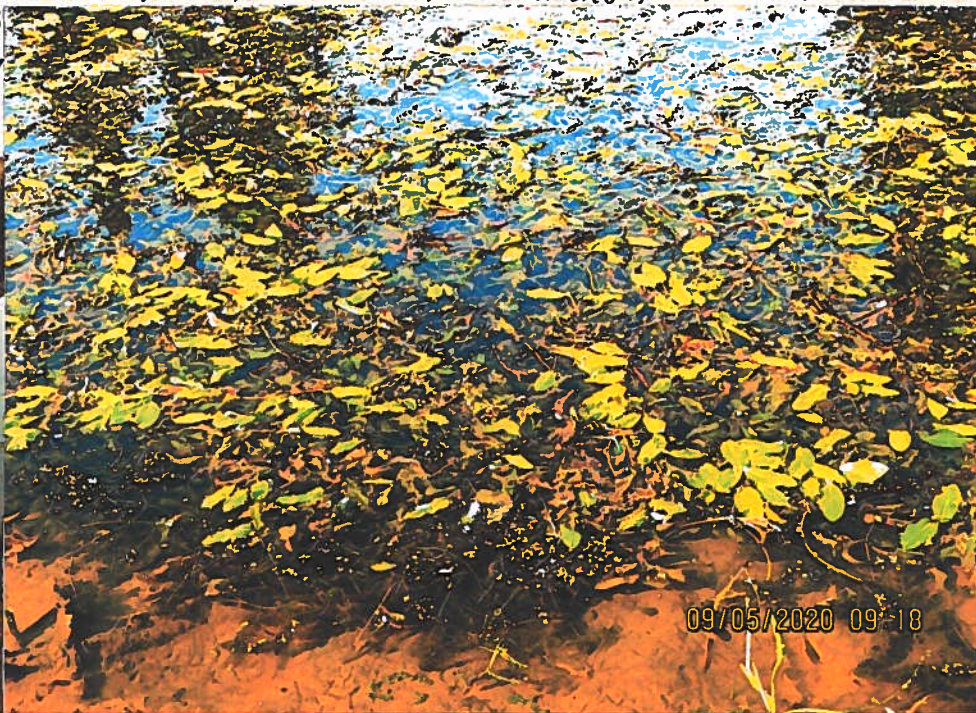
09/05/2020 09:14

9:13 → Large extent of overgrazing outward from the pond
 9:24 → View across the pond with Mike with barren ground

9:14 → short, mostly 1-2" stubble Sunflower-Wind Creek
 allotment N of 5800-200 rd.
 9:18 → Aquatic plants in the pond at end of 5840-170, sec. 31



09/05/2020 09:24



09/05/2020 09:18

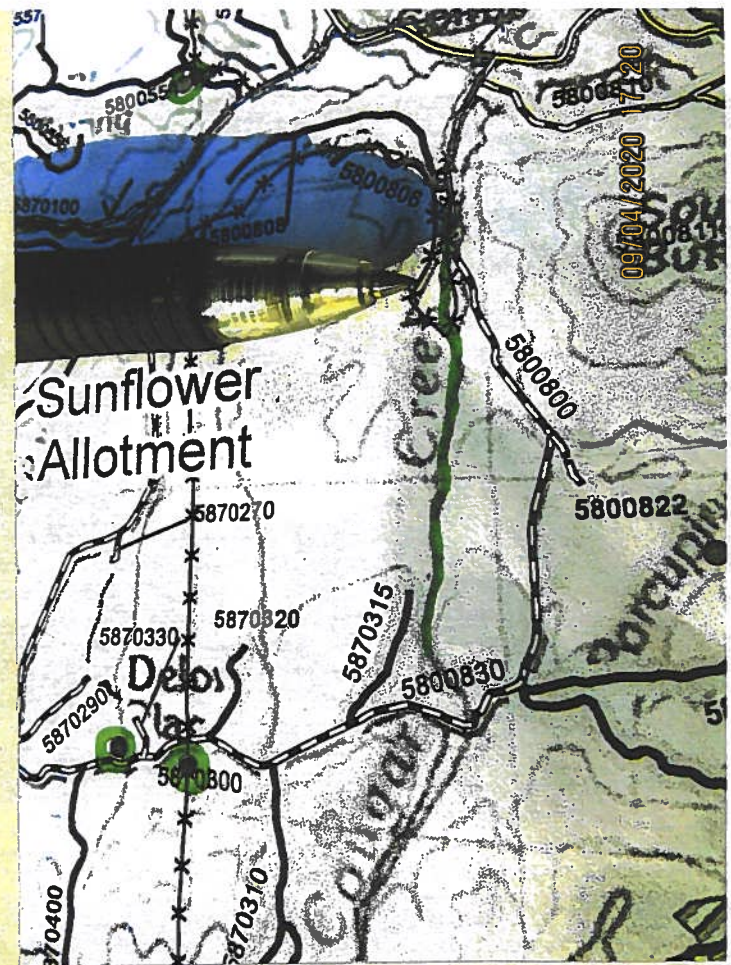
DATE 9-4-20
 NTL FOREST OCHOCO
 DISTRICT PAULINA
 Grazing Allotment SUNFLOWER
 Pasture COUGAR CREEK
 Location Coordinates W OF 58-800
N AND S OF RD 806
5 OF 58
 Surveyors Names MIKE & KAREN

09/04/2020 17:19



09/04/2020 17:20

17:20
 ← Overgrazed
 conditions with
 very short
 stubble heights
 North of rd. 806

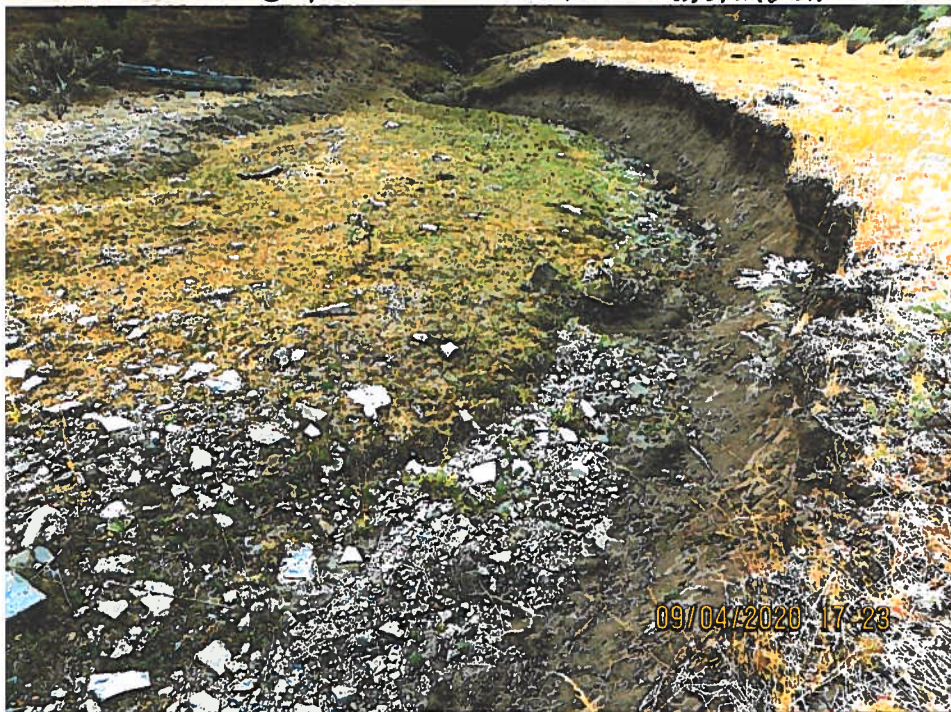


Subjective evaluation: The cattle damage is so extensive as to require well maintained fencing around the entire drainage and riparian hardwood planting wherever hardwoods historically thrived—such as along the creek channel in big meadows like this. Cattle exclusion and hardwood planting are necessary to repair and stabilize the creek banks (as well as to restore the biodiversity of springs and support biodiversity at livestock ponds.) There is extreme riparian damage across these allotments indicative of long-term Forest Service negligence.

Recommendation: Connect the new fence around Cougar Creek North of rd. 806 to the existing meadow fence. Keep all cattle out of all creeks (like Cougar Creek) or cancel the allotment—Don't reauthorize the permit.



17:22 a fish passage barrier (culvert too high) & eroded banks 17:25 a Intense overgrazing with cowpies North of rd. 806
 17:23 ~ Downcutting of stream channel Sunflower - Wind Creek Cougar Creek pasture
 allotment, Ochoco NF 17:21 ~ Stubble 1" or less with cowpies North of rd 806, S of 58



Timberline - Wind Creek allotment - Cougar Creek
West of 58-800 rd., N & S of rd. 806, S of rd. 58
Paulina Ranger District, Ochoco National Forest

Riparian Conditions and Livestock Damage:

Overall riparian description: Meandering dry downcut
creek banks; banks slumping into the channel
extensively, with a seep on the west side of the creek
channel north of road 806. Fine sediment level: bad
(piles of fine sediment from slumped banks)
Width vs. depth ratio: varies due to bank slumping
but mostly wider than deep; bank stability: very
bad (see eroded and slumping banks in photos);
meandering channel with small to large cobble with
little to no large wood; few willows and mint.

17:26 → cattle trampled stream bed, eroded stream banks, severe overgrazing, bare ground, and Bull thistle (at left)



17:27 → Down cut bank, meandering channel & overgrazing





17:33 visible fence line difference, but overgrazing on both sides 17:34 less grazed meadow to North, Sunflower-leaved Creek
 Congar Creek - W of 58-800, N & S of 806, S of 58 Paulina District, Ochoco NF Congar Creek allotment
 17:34 The left side of the fence is the less grazed meadow to the North 17:32 overgrazing with very short stubble





09/04/2020 17:41



09/04/2020 17:42

17:41 S. of rd. 806 - Extreme overgrazing with clipboard at distance
17:42 culvert & overgrazing Cougar Creek - W. of 58-800, S of 58,
Sunflower-allotment N+S of 806 Paulina,
17:41 closeup showing very short stubble ~~Waco Creek~~
17:43 rocky meandering channel with overgrazing Ochoco NF



09/04/2020 17:41



09/04/2020 17:43



17:46⁺ a very stunted willow in the creek channel

17:46⁺ slumping bank and overgrown channel

Sunflower ~~Wood~~ Creek allotment
Cougar Creek - W of 58-800 rd. Paulina District
N+S of rd. 806, S of 58 Ochoco National Forest

17:44⁺ Meandering channel with slumping banks & overgrazing



Hardly any
Livestock damage: riparian plan
Stubble all along the channel
is mostly less than 1" - not
meeting Forest Plan standards
the few willows left are mostly
heavily hedged; cattle trails,
cattle tracks, cattle scat, a
cattle trail right next to the
creek, which appears to be
drying up due to overgrazing
downcutting of banks, extensive
creek bank slumping into the
creek bed, heavy fine sediments
Verdenata grass & Bull thistle.



17:47 → meandering creek channel with downcut banks, sediment loading, overgrown channel
17:49 → meandering channel with slumping banks & excess sediment, short stubble Sunflower ~~land~~ ^{view} allotment, ~~Cougar~~ ^{Creek}





17:53 \nearrow browsed willow, 5 feet high

Sunflower allotment - Conger Creek pasture
West of 58-800 road, S of 58rd
N & S of rd. 806

17:49 \searrow creek bank with slumping bank leading to overgrown channel



17:52 \nearrow more overgrazing & eroded banks

Paulina Ranger District
Ochoco National Forest

Wildlife: a Hairy woodpecker
seen, Red tail hawk feathers,
wild horse manure, deer
tracks, Douglas squirrel -
Note absence of riparian-
associated and aquatic species
Losing the creek's bank
stability, water retention,
and riparian plants has
led to a lack of riparian-
associated wildlife diversity,
which is usually about
80% of the ecosystem's biodiversity

DATE 9-5-20
 NTL FOREST OCHOCO
 DISTRICT PAULINA
 Grazing Allotment WIND RIVER

Pasture _____
 Location Coordinates E of 5840
W of 5850
Below N. Section line
W & NW of 5850-020
 Surveyors Names' SW of 5850-100
MIKE & KAREN

Recommendation: Yes, fence it off and plant native hardwoods and other native riparian plants. If cattle are re-authorized for this grazing permit (we recommend that the permit be cancelled), the Forest Service can provide a water gap but keep cattle away from the banks.

09/05/2020 10:36



09/05/2020 10:17

Subjective evaluation: Unfortunately the spring here became a livestock pond. So now the Forest Service should try to restore biodiversity in the area. The Forest Service should lower and level the top of the berm, plant riparian hardwoods like willows and Red Osier dogwoods and use wildlife-friendly fencing with a water gap for cattle access or to start active riparian restoration even in the absence of cattle. The Forest Service could also plant native forbs and native grasses to compete with Ventenata grass in the adjacent meadow.

09/05/2020 10:17

Riparian Conditions: 10:17 → Excavated livestock ponds with heavy trampling around edges and bare ground. Shows some aquatic plants. No other riparian plants except for willows and cattails. Most of the perimeter is barren.
livestock damage: overgrazing with low stubble height, down to 2" to bare ground. Cowpies, Ventenata grass & Bull thistle



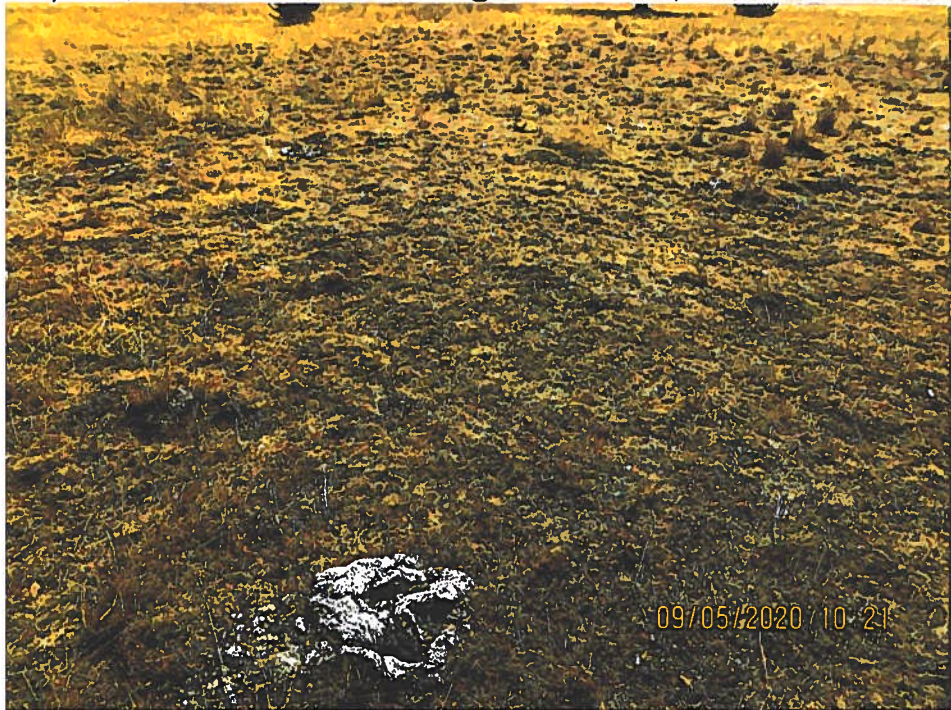
09/05/2020 10:21



09/05/2020 10:18

10:21 → overgrazing in the area surrounding the livestock
↓ pond, with almost barren ground (above) & short stubble?

10:18 → more willows & cattails w/ overgrazed berm / W of W of 5850-20
Sunflower - Wind Creek allotment - E of 5840, W of 5850 SW of 5850-100
10:20 → cattle trail leading to the livestock pond Ochoco District
Ochoco NF



09/05/2020 10:21

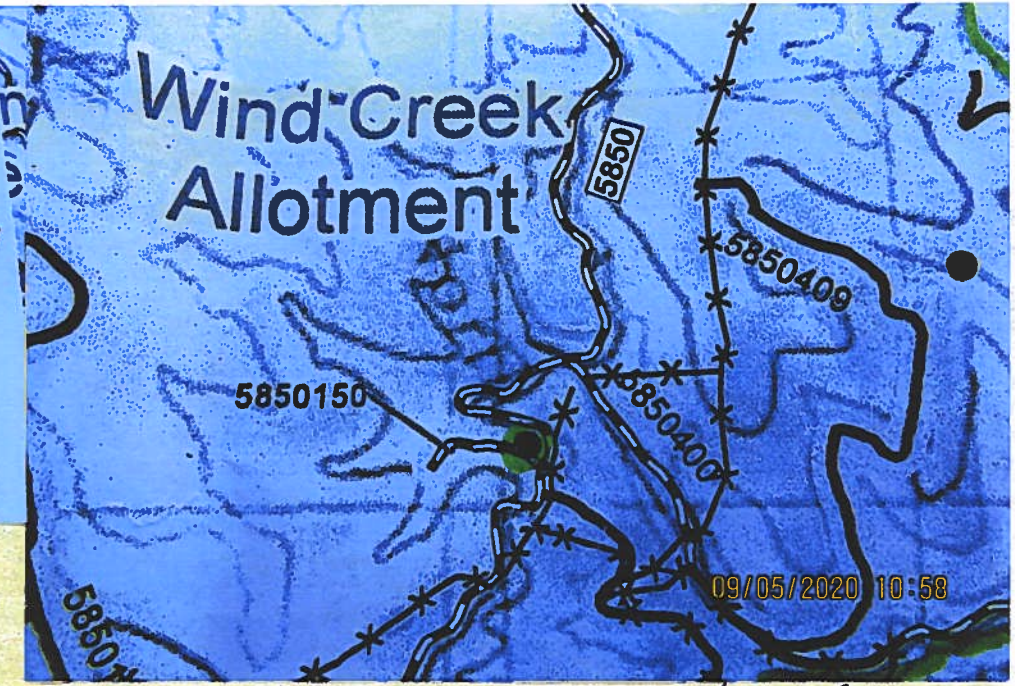


09/05/2020 10:20

ect

DATE 9-5-20
NTL FOREST CHOCO
DISTRICT PAULINA
Grazing Allotment WIND CREEK ALLOTMENT
Pasture _____
Location Coordinates W. OF 5850 AND FENCELINE
SW CORNER OF SECTION
N OF 5850-150
Surveyors Names' SW OF 5850-400
MIKE & KAREN NW OF 5850-140

09/05/2020



Recommendation: Completely fence to keep cattle out!
Use wildlife-friendly fencing. If cattle are allowed in the
area, access to water should be only via water gap.
Plant riparian hardwoods with the whole area fenced
(not just individual cages) if cattle are allowed.

Subjective evaluation: Very crude impoundment design.
(see lower left & following photos.)



⚡ This is how the Forest
Service destroys
Biodiversity with
Livestock.

11:14 →
Mating
Dragonflies in
the only green
grassy area
left.

10:59
⚡ excavated Livestock pond.
Note that the whole area
is overgrazed, with cow
pies on the bare ground
and completely dry "pond"
above the seep/spring source.





11:01 → Fence posts and fire ring in overgrazed livestock pond area

Riparian conditions:

A seep-like depression in a larger excavated hole with scarce rushes - browsed and trampled. No riparian plants around the water hole. Small willows on the side of the berm, some apparent rushes (see at right in 11:03)

Livestock damage: trampling of the riparian area, overgrazing all around, bare ground, cowpies, few willows in the drier part of excavation (small), very low water level, yellow dock (an exotic invasive plant), now cattle present at the time.

Sunflower-Wind Creek allotment, West of 5850 & fence line, SW corner of section, N. of 5850-150 rd., SW of 5850-400 rd., SW of 5850-140. Paulina Ranger District, Ochoco National Forest

11:00 → Remaining water in the pond with overgrazing, trampled.
11:03 → cowpies on the few remaining rushes by the water





11:06 → a garter snake seen hunting in the small water pool
 11:13 → Dragonflies mating in the small green area around the pool

11:12 → There were many dragonflies mating in this limited moist grassy area



Wildlife sign: Elk tracks, 12 Spot dragonflies, deer tracks, water spiders (skimmers), & a garter snake

Sunflower-Wind Creek allotment
 West of 5850 and fence line, SW corner of the section,
 North of 5850-150 rd, SW of 5850-400 road, NW of 5850-140 road. Paulina Ranger District,
 Ochoco National Forest

DATE 9-5-20
 NTL FOREST OCHOCO
 DISTRICT PAULINA
 Grazing Allotment WIND CREEK
 Pasture _____
 Location Coordinates N. FORK "SQUAW CREEK"
CREEK CROSSES 5850
5850 - 400 ADJ TO CREEK TO NE AND
 Surveyors Names' MIKE & KAREN
AND SE OF THE CULVERT
5850-440 ADJ TO
NE BUT NW OF THE
CULVERT
ALSO IN SW CORNER OF
THE SECTION

09/05/2020 12:31



09/05/2020 12:30

Recommendation: Do not renew cattle (livestock) grazing for this pasture or fence off all fish-bearing creeks and tributaries with wildlife-friendly fence, replant hardwoods.



09/05/2020 11:49

11:49 → Garter snake in "Squaw" Creek

12:21 → Trampling of stream bank with cow scat and hoof shearing eroding streambank into the stream



09/05/2020 12:21



09/05/2020 11:49

Sunflower-Wind Creek allotment
 North Fork "squaw" Creek (which needs to be re-named)
 near where it crosses rd. 5850, 5850-400 adjacent
 to the Northeast and Southeast of the culvert, in the
 SW corner of the section
 Paulina Ranger District, Ochoco National Forest

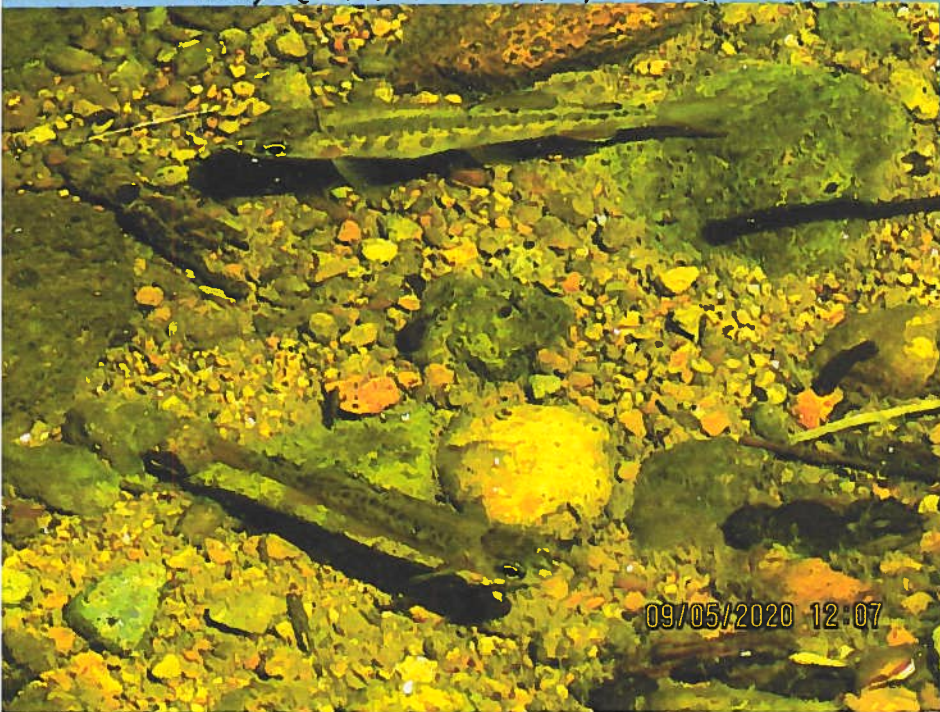
Wildlife: Redband trout fry, about a 14" long garter snake,
 Caddis fly larvae, Dragonflies, & yellow jackets

Subjective Comment:

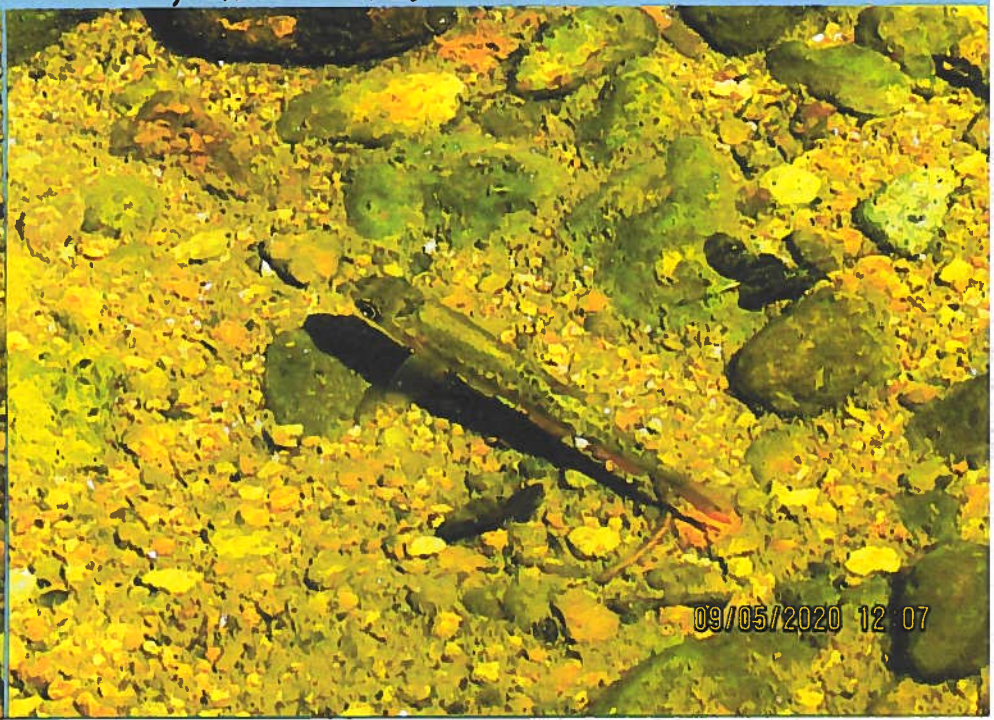
⊕ Redband trout are a Sensitive species and a Management
Indicator species for this Forest and must be protected
 from cattle!

1:49 → another view of the garter snake in the creek

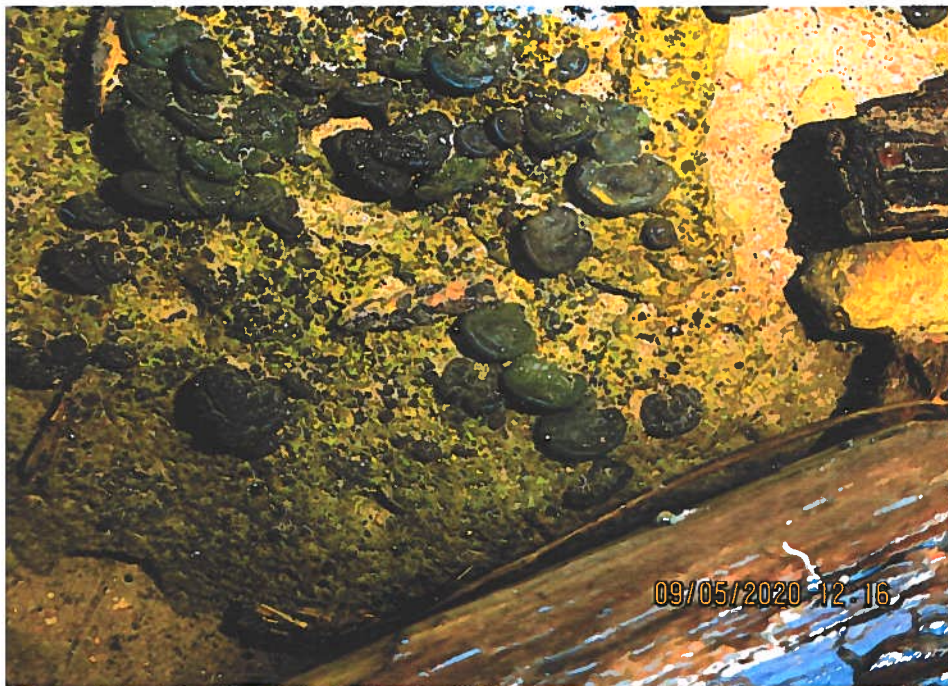
2:07 → likely Redband trout fry in "squaw" Creek and views of small to medium cobble in a section with water



09/05/2020 12:07



09/05/2020 12:07



12:16[→] Apparent Caddisfly larvae (elongated pink & gray organisms in the photos) 12:19[→] culvert w/ alder & barren banks
 12:15 & 12:16[↔] in "squaw" Creek - Note changing positions of these & - important prey species for fish.



Sunflower-
 Wind
 Creek
 allotment
 N. Fork
 "squaw"
 Creek-
 crosses
 5850 rd,
 5850-400
 adjacent
 to creek
 to NE,
 SE of the
 culvert,
 SW corner
 of the section
 Paulina RD,
 Ochaeco NHE
 Forest



12:21 → Cattle trail and barren ground by creek overgrazed
12:21 → upstream view of creek drying up with no hardwoods

12:49 → slumping bank moving into the creek with heavy sediment - from intense over-grazing



Subjective evaluation: This would be a lovely spot if not for the cattle presence. We are concerned that there are Redband trout fry in this creek and no protection from cattle.

Livestock damage: bad width to depth ratio for creek channel, slumping banks, over-grazing all around, cowpies in stream, hoof-shearing, barren eroded banks, lack of riparian plants - no hardwoods except for pool by culvert with isolated alder, lack of success in re-planting - empty seedling cages, bull thistle infestation by the creek, bare ground, virtually no stubble all around the creek, cattle trails, cattle tracks.

Sunflower-Wind Creek allotment, North fork "Squaw" Creek, creek crosses 5850 rd., 5850-400 adjacent to creek to NE, SW corner of section - Paulina District, Ochoo Nth Forest