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First name: John

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Organization:

Title:

Comments: Re: Comments on the Oak Knoll Range Project, Environmental Assessment 2020, Project #56842.

Dear Ranger Sullens,

I am a landowner within this project, specifically in the Northern portion of the East Beaver Allotment, at the Siskiyou Crest. I have owned my tree farm for over a quarter century and visit the farm regularly to manage the resources. A decade ago, I had a buck rail fence built, 2 miles of fence to be exact and at the same time a public review of this allotment was in session. There was public forum and a comment period in which I participated. Again, I am documenting this event and commenting on this project.

The fence was built to keep trespass cattle out of the extensive riparian area on my private property. Because of the elevation of the property, the maintenance of the fence has been a lot of work, due to heavy snow years, aggressive cows and vandals. When I visit my property, I hike all over the area including the surrounding Forest Service lands. On my hikes just before the snow completely disappears, the snowmelt water runs everywhere and the soil pushes forth a new cycle of plants after a long winter sleep undisturbed. When the cows enter into the area usually in the month of June, there is substantial change to the soil, watercourses, springs and wet meadows (water systems). From June to November, the cattle progressively damage and pollute the wet areas. The degrading of valuable water resources is the reason for my comment on this project. The entire area is classified as Riparian Reserve (MA 10) according to Klamath National Forest Plan. From my observations, there is no effort by Forest Service or the permittees to protect this Riparian Reserve (MA 10).

The Environmental Assessment Draft submitted for review, has vague and limited input as to the protections of the RR (MA 10). On page 8 & 9, of the Draft, Outlines the Monitoring Strategy, Implementation Monitoring and Multiple Indication Monitoring (MIM). The (MIM) plot mentioned seems to be well below the Crest. There seems to be no monitoring or (MIM) plots at the headwaters of waterways throughout the Crest region. The Crest water systems are very fragile, they set the state of water quality for the drainage below. The draft does show a map fig. 5 page 21 of the capable rangelands and extend through my property and encompass the RR (MA 10), but no (MIM) plots.

The Draft refers to the Clean Water Act, both the federal Water Pollution Control Act of 1972 and the California Porter-Cologne Act. (Page 52) Then states the proposal meets all conditions under Category B of the Waiver on page 52. I reviewed the Waiver under Category B of the last application and from my point of view, the activities in this allotment at the crest have not been in compliance with Best Management Practices (BMP) and consistent with the Aquatic Conservation Strategy (ACS), Aquatic Management Strategy (AMS) and in violation of the California Environmental Quality Act (CEQA). Intensity Factor 10.

The effects of cattle grazing are well documented on meadows, wetlands, riparian areas and near water sources, unless excluded from or actively herded, cattle typically occupy meadows, wetlands and riparian areas where they obtain forage, water and shelter; and their much larger size and weight compared to wildlife results in greater hoof pressure on soils, thus erosion.

Protecting springs, streams, and wetlands from the impact of livestock (and restoration of areas already

degraded) are of utmost important because they represent a small subset of the landscape, they provide disproportionately important ecosystem services and they suffer disproportionate adverse impact from livestock grazing.

On page 16 of the Draft, gives mention to the Beaver fire in 2014 that changed rangeland conditions. This change opened up more grazing area, approximately 9,550 acres of the South West portion of the allotment that had little to no grazing prior to 2016. This would be an opportunity to exclude grazing in the North Area of the allotment, make monitoring much easier for the management teams and permittees. But, this alternative was not analyzed in detail, because of two reasons (page 15), capable rangeland and forage at the crest (sensitive riparian zone)(MA 10) and the gathering of cattle for the move to the Crest.(Will not have to gather the cattle for the move if the North is excluded from grazing) The pictures on page 27, figures 6-9 are nice meadow shots, no cows?, little to no damage?, it seems the permittees and range managers of the Rogue River allotment take better care of their project. Wish the area of Sterling Mountain look half as good!

Also, the draft did not address the dynamics of Climate. With warming temperatures, the allotments cannot afford to deal with additional stressors, like cattle grazing. USFS must keep the quickly changing climate in mind in every decision made, including this one. Climate cannot be disregarded or not addressed. I have witnessed the changes in this area over the decade. Climate change is a new and added stress on native ecosystems. Climate change is expected to increase winter storms, summer droughts, and cause earlier spring snowmelt and run off. This adds stress to plants, animals, and streams that are also stressed by grazing. To avoid cumulative impacts from the combination of climate stress and anthropogenic stresses such as grazing, the Forest Service needs to reduce these stressors.

The Forest Service should not misunderstand their responsibilities under the multiple-use laws. The Forest Service is not required to allow livestock grazing everywhere, nor everywhere they have historically or currently allowed grazing. Their highest priority is to meet the requirements of substantive requirements of the Clean Water Act and Endangered Species Act even if it means curtailing grazing. The Forest Service should strongly weigh the moral imperative of mitigating climate change by storing more carbon in un-grazed ecosystems. People who choose to raise cattle should bear the full cost of their business operation.

Lastly, the purpose of analyzing the impacts of a proposed project through an environmental assessment is to determine if the adverse impacts remaining after applying mitigation measures would be significant. If so, then an Environmental Impact Statement would be required. Given the abundant evidence of significant impacts resulting from cattle grazing the higher elevation habitats of the Siskiyou Crest, including meadows, wetlands, water quality, as well as habitats for species listed under the Endangered Species Act, the Forest Service prepare an Environmental Impact Statement for the proposed grazing project known as SOPA #56842 and identify "NO Action" as its preferred alternative.

Thank you for your time reviewing my comment.

Sincerely, John McDonagh