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Comments:

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To: Jacob Young

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Ochoco National Forest

RE: Comments on the Sunflower Grazing Reauthorization and Wildlife Habitat Improvement Project-Draft Environmental Analysis

Wildlife Habitat Improvement Projects:

Forest Road 550 (AKA FR#1647) was designated in the Scoping document to be retained on the Forest Road System as an open road. F.R. 550 has always been the principle route that my predecessors and I have used to access my Columbus Creek in-holding property. My previous written public comments on the Wildlife Habitat Improvement projects in the Scoping document were predicated on F.R.550 remaining open for public use. I would have strenuously objected in my previous comments had the Agency contemplated in the Scoping document to close F.R. 550-as it is now proposed in the draft Environmental Analysis.

The alignment of F.S. 550 also has a historic use that predates the consolidation of lands into the Forest Service. To move livestock and access private lands, the owners of homestead parcels that were once prevalent in the Sunflower and Hardscrabble area used a stock-driveway/wagon road that closely aligned with the present location of F.S. 550. Although many of these homestead parcels are now incorporated into the Forest Service holdings through land exchanges, the change in ownership did not extinguish the pre-Forest Service public use and established right to access this alignment. In other words, F.S. 550's historic use establishes it as a SR 2477 Road, and it should not be subject to closure restrictions.

If Forest Road 550 were to be closed, Forest Road 100 would be the only alternative route available to access my Columbus Creek in-holding property. This route is circuitous, much more seasonally limited, has sloughing fill and cut slopes and an actively eroding road prism with steep gradients. F.S. 100 was principally designed and developed to provide access to a rock source and was not intended to be a mainline access/system haul road. Because of the physical characteristics and design standards of F.S. 100, it is also a much less safe travel way than F.S. 550. By any measure, F.S. 100 is a poor and unsuitable alternative route to use to access my property.

I believe a better approach to improving the wildlife habitat in the Columbus Creek and Hardscrabble area would be to close, with gates or vehicle barriers, F.S.100 and all of the roads south of the F.S.550 / Columbus Creek crossing. This would afford elk a long uninterrupted escapement and calving corridor between F.S. 550 and Sunflower Creek. F.S. 550 should be retained as an open road on the Forest System to continue to provide for a historic, safe and stable travel way to the upper reaches of Columbus Creek and my in-holding.

Sunflower Grazing Reauthorization:

The draft EA make refers throughout its body to the conditions present in the project area in the pre-European settlement period. However, the final EA should include a comprehensive subsection entirely devoted to a detailed description of the project area conditions in the pre-European period. This affords all of the stakeholders a consolidated baseline from which to compare present conditions and the merits of the proposed actions in the project area.

The draft EA cites data from various assessments and sample plot measurements used to describe past and current conditions, as well as, the projected outcomes of future actions in the project area. For the most part, the statistical significance (sample intensity) of a number of these pivotal metrics was not adequately established to justify extrapolating this data over large landscapes or to be employed in rating and site evaluation schedules. The GIS map assessments and interdisciplinary team observations of the project area could provide some vital information. However, without a rigorous ground-truthing regiment to validate this information, it remains only anecdotal information; and therefore should not be used in the main for site trending analysis or for decision making. Without statistically valid field sampling of all of the key indicators across the project area, the Accumulated Effects Analysis and other determinations in the draft EA lack credibility. The concern in this regard is not with the various methodologies used throughout the draft EA, but rather with the quality and quantity of the field and validation data employed in the calculations.

The Resource Protection Measures and Best Management Practices subsection in the draft EA provides for some very sound and prudent resource protection measures. The implementation of these BMPs would indeed greatly reduce the further degradation of the project area. However, without having a detailed Administrative Compliance Plan in the draft EA, it is difficult to have confidence that these measures would be implemented in the field. The final EA should have an Administrative Compliance Plan for this project that includes, but is not limited to: the number of field administration hours/AUM; a template of a BMP check-off inspection report; reporting frequency of the BMP inspection report; a requirement to produce compliance breach and remedial action documentation and the routing instructions for reports to Agency staff and line personnel etc.

As a result of cattle excrement, it is not uncommon in the late summer to encounter discoloration and septic odor in some of the wet stream courses and riparian zones in the project area. Consequently, it is highly likely that the water in these areas contain unhealthy levels of bacteria. To meet the Ochoco Forest Plan objectives, the final EA should include a water sampling regiment in the project area to insure that water on and being discharged from the National Forest is safe and meets appropriate quality standards.

Throughout the project area, riparian zones and stream courses have been subject to over a century of abusive grazing practices. The rehabilitation and proposed protection measures in the draft EA are laudable, but are inadequate to address the extensive damage that has occurred over time in the project area. The long-term mechanical damage by cattle has created significant stream course bank sloughing and hydrological impairment throughout the project area. This damage is especially true in the Columbus Creek and Sunflower Creek drainages. Exclusion fencing and pasture rest periods are the only effective means reasonably available to protect and to begin to rehabilitate these damage sites. In the final EA, additional fencing and extended pasture rest periods should be substantially increased to assure that the proposed project outcomes align with the objectives in the Ochoco Forest Plan.

I truly hope that the Forest Service will move beyond a business-as-usual approach to livestock grazing in the final EA for this project. To preserve grazing as a key resource management tool, future practices must comport with 21th Century values and stated Forest Service environmental objectives.

Thank you for considering my comments on the Sunflower Grazing Reauthorization and Wildlife Habitat Improvement Project.

Sincerely

Chris Paulson

cc: Johanna Kovarik