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Johanna Kovarik, District Ranger

Paulina Ranger District/Ochoco National Forest

3160 NE 3rd Street

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Dear Ms. Kovarik:

I am writing to comment on the Draft EA for the Sunflower Grazing Reauthorization and Wildlife Habitat Improvement Project. I commend the author(s) on the caliber of the presentation. The breadth of relevant information and the coherent analysis of issues and impacts are of a quality that should be standard for all EAs. It is a thoughtful document that seems to provide a sound basis for the recommended action.

As noted in the introductory remarks, cattle have been grazing the area since 1911, and it is Forest Service policy to allow such activity where it is found to be compatible with other forest values. I generally support this policy, and I support re-authorization of the subject grazing permits, with certain caveats. I realize that not all of these caveats can be addressed directly in the context of this specific NEPA proceeding, however I still respectfully request that they be considered as grazing continues on the Sunflower Cluster specifically, and on the forest generally.

Here are my specific concerns:

--My understanding is that the district and forest have sufficient funding and personnel to provide adequate monitoring of the allotments to ensure lessee compliance and to protect range resources. If at any time this fails to be true, then I think it is incumbent on district and forest managers to evaluate, and possibly amend, the permits.

--I understand that the permits will be in effect for 10 years. I have no problem with this, generally speaking. However, I am concerned that climate change and prolonged severe drought may create changes on the ground within that time frame that make it difficult to meet the standards of resource management and protection set in the permits. While the "active management" approach contemplated in this re-authorization may afford the flexibility needed to address climate- or drought-driven crises prior to the next re-authorization, it is important to keep a close eye on the climate factor. Ranchers with grazing permits also deserve as much certainty in their dealings with USFS as possible. Perhaps one way for all stakeholders to stay flexible and nimble is to set up a small working group that might meet a couple of times a year to share information and concerns arising from climate changes and drought. Such discussions might be able to identify issues and possible solutions in a non-crisis fashion that could then inform USFS decision-making and foster collaboration among stakeholders.

--I read with interest and some concern the EA's presentation on invasive plant species. One could wish that the projected impact of this project on facilitating weed introduction would be less. Obviously, cattle are not the only cause of invasive plant introduction, and I appreciate the current efforts being made by Ochoco NF to eradicate and/or manage invaders. What worries me is that, notwithstanding USFS policies in support of grazing, in part to support local economic activities, cattle are creating negative impacts in this area. They are in the process creating real costs that are probably not being captured or offset in grazing fees. This is neither the place nor the proceeding to tackle the issue of fees, or the broader question of resource management costs and trade-offs.

However, given the expected impact of this project on facilitating the further intrusion of invasive plant species, some additional preventative action on the part of stakeholders seems warranted. This could take a number of collaborative forms, including in-kind services provided by permit holders (weed pulls, helping more directly with invasive plant monitoring, etc); additional, more prominent signage about invasive plant risks at trail heads, campgrounds and pullouts), public information sessions and materials distributed on and outside the forest in surrounding areas.

--It seems clear that the project is unlikely to have much impact on sage grouse. However, given the uncertain status of federal and state protective strategies throughout its range, this is another issue that require close watching. If more progress is not made soon in developing a coherent and robust sage brush conservation strategy, then even marginal or under-utilized habitat may become more critical than it now appears. And, as noted above, critical junctures in sage grouse policy may be reached long before these permits are up again for re-authorization.

I appreciate the opportunity to review and comment on this project.

Sincerely,

Jeffrey Richardson