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Comments: Congratulations to the Ranger District for completing the Rumbling Owl EA. There is much to be happy about with this project. I am pleased it addresses reducing fuels and improving forest health, and rehabilitation old gravel pits and providing better fish passage. However, there are some substantial shortfalls in the EA that I need to call your attention to.

First and foremost is the lack of analysis regarding the cumulative effect of the cattle & horse grazing allotments in the Aquatics section. The At-risk plant analysis correctly notes the lingering impact of these grazing allotments but the Aquatics analysis appears to have completely forgotten this. What impact will precommercial thinning, burning and commercial thinning in the RMZ have on sediment delivery to the stream in light of the grazing? It seems that thinning and opening up the inner and outer RMZ will attract cattle to the RMZ and result in long-term sedimentation. The analysis reports a temporary increase in sediment delivery only (due to associated road work) but fails to consider the long-term potential delivery from changed cattle distribution. Based on my familiarity with the area, units 297R, 136A and 250R seem especially problematic.

I also note the impact of repairing the slump and installing a temporary crossing on FSR 905 seems to have been overlooked or forgotten. The only thing I can deduct from this is a generic table in the Aquatic section that mentions some unspecified sediment delivery in the large "Condon area" watershed. Is this from work on FSR 905? What is the impact of this work to Buck Creek? I search through Project File F8 that shows potential stream segments with sediment delivery but Buck Creek is not listed. It seems hard to believe that clearing out the trees and installing some unspecified kind of crossing would have no impact at all. I also question the economic viability of this work for just a few units. The Economic section is silent on this tradeoff and I am uncertain if this is a good use of taxpayer funds.

I also wonder what the impact of this work is on the Holland Lake Conservation Watershed Network. Does this project make any progress on this forest plan goal? I could not find where the EA considers that.

Thank you for considering my comments