



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

September 2, 2005

Jeff Walter, Forest Supervisor
Six Rivers National Forest
1330 Bayshore Way
Eureka, CA 95501

Subject: Draft Environmental Impact Statement (DEIS) for North Fork Eel Grazing Allotment Management, North Fork Eel River and Upper Mad River Watersheds, Trinity County, California (CEQ # 20050281)

Dear Mr. Walter:

The U.S. Environmental Protection Agency (EPA) has reviewed the above-referenced document pursuant to the National Environmental Policy Act (NEPA), Council on Environmental Quality (CEQ) regulations (40 CFR Parts 1500-1508) and Section 309 of the Clean Air Act. Our comments are provided in accordance with the EPA-specific extension to the comment deadline date from August 22, 2005 to September 2, 2005 granted by Julie Ranieri, Team Leader, Six Rivers National Forest (telephone conversation between Laura Fujii and Julie Ranieri, July 8, 2005).

Based on our review, we have rated Alternative 1, the Proposed Action, as Lack of Objections (LO). The Proposed Action will address site-specific problems regarding bank stability, soil compaction, and forage utilization of riparian and annual grasslands, thereby reducing sediment inputs and improving water quality and riparian habitat. Of special note are the closure of the impaired Upper Salt Creek unit, delayed turnout dates to reduce soil compaction, fencing of riparian areas in Kettenpom Creek and Crabtree Place, and earlier riparian monitoring. These actions will provide significant benefits to water quality, rangeland conditions, and riparian habitat, allowing these resources to recover from grazing impacts.

The DEIS states that unauthorized trespass into the closed Upper Salt Creek unit from the Hoaglin and Long Ridge allotments is anticipated because of the lack of topographic controls, lack of effective methods of distributing livestock, and adjacent unfenced private land. Alternative 4, No Grazing in Hoaglin and Long Ridge Allotments, was developed to maximize recovery of the Upper Salt Creek riparian areas by ensuring complete livestock exclusion. To minimize environmental impacts in these sensitive areas, we recommend monitoring the frequency and effects of unauthorized trespass and a commitment to reconsider Alternative 4, as the preferred alternative, or implementation of additional livestock management measures to reduce unauthorized trespass to acceptable levels.

While we commend the environmental benefits of the proposed project, we have identified opportunities for other mitigation measures and the need for specific information on funding, implementation of rangeland improvements, potential impacts on recreation, and the economic feasibility of the action alternatives for permittees. Inclusion of this information will ensure that decision makers and the public have a full understanding of the context and consequences of the project. Please see the enclosed Detailed Comments for our recommendations regarding mitigation and specific information that should be included in the Final EIS (FEIS). *A Summary of EPA Rating Definitions* is enclosed.

EPA appreciates the opportunity to review this DEIS. When the FEIS is released for public review, please send two copies to the address above (mail code: CED-2). If you have questions, please contact me or Laura Fujii, the lead reviewer for this project. Laura can be reached at 415-972-3852 or fujii.laura@epa.gov.

Sincerely,

Signed by Laura Fujii for

Nova Blazej, Acting Manager
Environmental Review Office
Communities and Ecosystems Division

Enclosures:
Summary of EPA Rating Definitions
Detailed Comments

**EPA DETAILED COMMENTS ON THE DRAFT ENVIRONMENTAL IMPACT STATEMENT
FOR NORTH FORK EEL GRAZING ALLOTMENT MANAGEMENT, TRINITY COUNTY, CA,
SEPTEMBER 2, 2005**

Mitigation Opportunities

Noxious Weeds. The inventory of noxious weeds indicates an abundance across the allotments (p. 87) and an increased trend in occurrence (pps. 109, 215). Other than current management (Alternative 3), Alternative 1, the Proposed Action, would pose the highest risk of continued spread of noxious weeds due to the number of authorized cow/calf pairs, disturbance caused by congregating livestock and rangeland improvements, and the number of allotments open for use (p. x). Management of noxious weeds under the Proposed Action includes Yellow Starthistle treatments at rangeland developments and specific localized invasion sites.

Recommendation:

Given the increasing threat of noxious weeds to diversity and the quality of rangeland (p. 88), we recommend consideration of other management measures to address this problem. For example, the Final EIS (FEIS) should examine treatments for the undesirable medusahead and hedgehog dogtail (p. x) and other noxious weed control measures such as prescribed burning and herbicides which could be applied by the Forest Service in partnership with the allotment permittees. The Forest Service should commit to implementation of more of these control measures and include an estimate of the environmental benefits of these measures in the FEIS.

Oak Woodlands. Oak woodlands are an important secondary range for the analysis area. No data was collected on oak woodland soil compaction. Instead, data from the more sensitive grasslands soils was used to assess the likelihood that soil compaction would be found within the oak woodlands (p. 57).

Recommendation:

To verify the above assumption and mitigate potential grazing effects to oak woodlands, we recommend implementation of exclosure plots within oak woodlands to measure soil compaction susceptibility. Additional allotment management measures should be implemented, if oak woodlands soils do not meet the Forest Service soil compaction standards. The Forest Service should describe and commit to these mitigation measures and include an estimate of environmental benefits of these measures in the FEIS.

Specific Information

Economic Costs. Although the Draft EIS (DEIS) provides data on the economic cost of a shorter grazing season (e.g., replacement forage) (pps. 147, 148; Tables 54 and 55), the document does not state whether the Proposed Action or other action alternatives would be economically feasible for the allotment permittees or the local community.

Recommendation:

The FEIS should provide a detailed evaluation of the potential economic effects of the proposed action alternatives on the allotment permittees, local communities, and other forest users.

Funding and Implementation Schedule. The Proposed Action would address resource concerns by developing alternative water sources, constructing drift fences, and repairing existing rangeland facilities. If further reduction in livestock use is necessary or unauthorized livestock occurs at the Red Mountain boundary, additional fences would be constructed (p. 27). The DEIS does not provide information on funding, the schedule for implementing proposed improvements, or the date for determining when additional fences are required.

Recommendation:

The FEIS should include specific information on funding, the proposed schedule for rangeland improvements, and a target date for determining whether optional rangeland developments need to be implemented.

Travis Ranch Allotment. The Arcata Field Office of Bureau of Land Management (BLM) has completed and approved the Travis Ranch Allotment Grazing Lease, which is used by the permittee of the Forest Service Van Horn Allotment for winter forage in a partial rotation grazing system (p. 17). Although the DEIS considers the BLM Travis Ranch Allotment within the cumulative effects analysis, it does not provide specific information on the Travis Ranch Allotment Management Plan or environmental conditions of the allotment. Information on the Travis Ranch Allotment would provide context for the Forest Service Proposed Action since the Travis Ranch Allotment is operated in tandem with the Van Horn Allotment.

Recommendation:

The FEIS should provide a summary of the Travis Ranch Allotment Grazing Lease, including the Allotment Management Plan, any special management conditions, and environmental conditions on this allotment.

Recreational Impacts. Recreational and Off-Road Vehicle use is increasing in the project area (p. 145). However, potential effects or conflicts between livestock and recreational use of the analysis area are not described in the DEIS.

Recommendation:

The FEIS should include specific information on recreational use, possible conflicts between livestock use and recreationists, and the potential effects of allotment management proposals on other users of the forest. If increasing livestock grazing and recreation conflicts are likely under the Proposed Action, the FEIS should evaluate and commit to management measures to reduce these potential conflicts.

Summary Paragraph DEIS North Fork Eel River Grazing Management

EPA has rated the Proposed Action as Lack of Objections (LO). The Proposed Action will benefit water quality, rangeland conditions, and riparian habitat. We have identified opportunities for other mitigation and the need for specific information on funding, implementation of rangeland improvements, potential impacts on recreation, and the economic feasibility of the action alternatives for permittees.