

US EPA ARCHIVE DOCUMENT



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

March 17, 2014

Susan Skalski, Forest Supervisor
Stanislaus National Forest
Attn: BEH Range
19777 Greenley Road
Sonora, CA 95370

Subject: Draft Environmental Impact Statement for the BEH Rangeland Allotments Project (CEQ # 20140021)

Dear Ms. Skalski:

The U.S. Environmental Protection Agency has reviewed the Draft Environmental Impact Statement for the Bell Meadow, Eagle Meadow and Herring Creek grazing allotments (BEH) Rangeland Allotments Project, Stanislaus National Forest. Our review is provided pursuant to the National Environmental Policy Act, Council on Environmental Quality regulations (40 CFR Parts 1500-1508), and Section 309 of the Clean Air Act.

EPA supports the effort to maintain or bring about sustainable, functioning ecological conditions in the Stanislaus National Forest, and implementation of adaptive management strategies. Nevertheless, we are concerned that further resource declines will occur unless additional rangeland management changes are made. EPA recommends consideration of further reductions in grazing where water quality problems exist.

Based upon our review, we have rated the proposed Preferred Action Alternative 1, which would reauthorize livestock grazing in the Summit Ranger District, as *Environmental Concerns-Insufficient Information (EC-2)* due to the potential for further degradation of water quality and habitat for species of concern. See attached "Summary of the EPA Rating Definitions" for a description of the rating. We have identified additional measures to be incorporated into Alternative 1 (including elements of Alternative 4) in order for the preferred action to be more protective of the environment.

EPA is concerned that the preferred action does not go far enough to meet two of the three "Purpose and Need" statements listed in the DEIS. Specifically, EPA is concerned with resource protection needs due to poor conditions. We suggest the FEIS include resource protection measures such as a reduction of the number of acres affected by grazing, reduced stream bank disturbance, and a decrease in livestock access to areas that include habitat for species of concern such as the Yosemite toad and the Sierra Nevada Yellow-Legged Frog. Our detailed comments are enclosed.

We appreciate the opportunity to review this DEIS. When the FEIS is released for public review, please send one hard copy and two CD ROMs to the address above (mail code: ENF-4-2). If you have any questions, please contact James Munson, the lead reviewer for this project, at (415) 972-3852 or munson.james@epa.gov, or me at (415) 972-3521.

Sincerely,

/s/

Kathleen M. Goforth, Manager
Environmental Review Section

Enclosures:

Summary of EPA Rating Definitions
EPA's Detailed Comments

EPA'S DETAILED COMMENTS ON DRAFT ENVIRONMENTAL IMPACT STATEMENT FOR THE BELL MEADOW, EAGLE MEADOW AND HERRING CREEK GRAZING ALLOTMENTS (BEH) RANGELAND ALLOTMENTS PROJECT (PROJECT), STANISLAUS NATIONAL FOREST. (CEQ# 20140021) MARCH 17, 2014

Proposed Action (Preferred Alternative 1) Description

Alternative 1 proposes to improve the ecological condition of the rangelands through expansion of the current rangeland. Theoretically this would more widely distribute adverse impacts thus reducing the level of degradation to currently over stressed resource areas. Alternative 1 would set proper use criteria/utilization for areas to protect species of concern and their habitat.

Allotment Management Plans (AMP's)

The Draft Environmental Impact Statement (DEIS), page vii states: "The Stanislaus National Forest proposes to: update Allotment Management Plans, change Allotment boundaries, and implement design criteria, including resource conservation measures and an adaptive management strategy that would move existing resource conditions toward desired conditions".

Recommendations:

- The Final Environmental Impact Statement (FEIS) should explain the timing of updates for the AMP's and discuss whether any additional environmental analysis is needed for their development.

Water Quality

The DEIS identifies grazing management activity as "detrimental impacts to individuals and habitats" due to harmful effects on water quality and quantity (page: 59). Livestock grazing can directly affect water quality through increased sedimentation, erosion, and nutrient inputs. Indirect effects include a reduction of water quantity, increased water temperatures, and changes in streambed morphology. Nevertheless, the DEIS does not appear to prohibit livestock grazing within the streambed corridors.

Recommendations:

- The FEIS should disclose existing and proposed practices that prevent livestock from entering streambed corridors and wetlands associated with seeps and springs (e.g. fencing).
- We recommend the FEIS commit to implementation of management measures that would remove or reduce livestock grazing in areas where water quality problems exist in riparian and stream conditions due to nutrient and sediment loading.
- Clearly state avoidance measures that will be taken to protect already stressed habitat areas currently adversely impacted by grazing.

Endangered Species and Species of Concern

The DEIS insufficiently evaluates the potential impacts to endangered species such as California red-legged frog and Lahontan cutthroat trout. For example, the document states, “Detailed analysis was not completed for the following species based on the absence of suitable habitat” (page: 47). However, the document falls short of stating why the habitat is unsuitable or if this condition is caused by past grazing. In addition, measures to reduce impacts to endangered species and species of concern should be integrated into the preferred action.

Recommendation:

- The FEIS should commit to additional measures to decrease livestock access to areas that include habitat for endangered species and species of concern such as the Yosemite toad and the Sierra Nevada Yellow-Legged Frog.
- The FEIS should include a comprehensive biological survey of the entire project area as well as the streams above and below grazing areas, including a complete review of species that may be affected by the project. The results of consultation with the United States Fish and Wildlife Service and National Oceanic and Atmospheric Administration (NOAA), if appropriate, regarding threatened or endangered species or critical habitat should be included in the FEIS.