Appendix A
Response to Comments

Stocking Levels

1. Comment (Bark/ONRC p. 2):

How exactly will this "upward trend" be determined [adaptive management]? What amount of resource recovery is necessary to increase livestock numbers? How would the MHNF define a recover trend? The Forest Service must disclose the answers to these questions in its analysis so the public can fully participate in the NEPA process.

Response:

An upward trend would be determined by conducting *long-term* effectiveness monitoring through the establishment of transects at permanent monitoring locations. Effectiveness monitoring measures the progress from the existing condition towards the desired condition in response to changes in livestock management. Indicators would have to show at least two consecutive improvement readings in the particular monitoring indicator before any increase in AUMs would be considered. For example if the monitoring indicator is evaluating the increase of woody vegetation along streambanks, then monitoring data would need to show an increase in the amount of new tree (alder, willow, aspen, etc.) seedling starts within the monitoring transect. The increase would have to be apparent for two consecutive readings to show an upward trend. After initially establishing the monitoring location, long-term indicators reflecting resource condition (bank stability, greenline vegetation, and woody regeneration) would be sampled every 3-5 years. Any increase in AUMs would not occur for at least 6-10 years after establishing monitoring plots, and the effects of this increase would have to be within the parameters of effects discussed in the EA. If the effects were thought to be greater than what was disclosed in the EA, then new NEPA analysis would be necessary. The details of effectiveness monitoring are discussed on pages 15-17 of the EA.

2. Comment (Bark/ONRC p. 2 and 16):

The FS must consider the maximum number of cow/calf pairs when discussing the direct, indirect, and cumulative effects since the selection of the alternative would authorize "up to" 105 cow/calf pairs. In addition, the FS fails to take into account the effects of an additional 53 cows on the allotment when discussing the impacts of the proposed action on water quality.

Response:

The EA discloses the effects of authorizing up to 105 cow/calf pairs both in the current management and proposed action alternative. (Discussions can be found in the following sections: Hydrology/Aquatic Species, 58-67, 86; and Soils, 108 and 109). In terms of water quality, the effects of an additional 53 cow/calf pairs is discussed in terms of stream temperature (EA, 58, 59, 66); sediment (EA, 63, 64, 67); and nutrients/pathogens (EA, 65, 68).

3. Comment (Bark/ONRC p. 2):

Greater utilization and overutilization will only increase now that the allotment is smaller in size (as was seen in the monitoring sites with more cattle on the allotment.) Increasing the numbers of permitted cows on the allotment will only exacerbate the detrimental effects on the degraded riparian areas, despite the measures proposed to reduce the impacts in the proposed action.

Response:
When the allotment size decreased due to the land exchange in 1993, it was determined that the smaller allotment could sustain 105 cow/calf pairs. The current size of this allotment has remained constant since 1993. The monitoring data indicates that the reduction in livestock numbers from 105 cow/calf pairs down to 52 cow/calf pairs has reduced the over-utilization in the uplands monitored since 1999-2000, when the second permittee retired his permit (EA, 25 and 26). A forage capacity study completed in 2005 by the Mt. Hood National Forest Range Conservationist found that forage production is not a limiting factor given the current level of grazing (EA, 30 and 31). It was determined by the analysis that utilization concerns raised in the purpose and need are based on the lack of distribution of cattle across the allotment.

The proposed action addresses the need to protect over-utilization in riparian areas through the implementation of fencing, alternative water sources, salt blocks placed in the uplands, and varying turn-out locations (EA, 2-4 and 13, 14). Based on distribution concerns, increasing carrying capacity is not ripe at this time and would only be considered under the proposed action if distribution improved and the high-use areas showed a recovery trend. Any increase in AUMs would not occur for at least 6-10 years after establishing monitoring locations (see Response to Comment #1).

Wildlife Resources

4. Comment (Bark/ONRC p. 2 and 5):
Fencing is known to inhibit the migration and dispersal of mammals and can be lethal to birds. The FS does not disclose the impacts that the proposed fences could have on wildlife species. Fencing would inhibit the ability of wildlife to disperse and could capture individuals in the barbed wire.

Response:
A discussion of the effects of range fencing on wildlife was added to the EA on pages 99 and 100. It was disclosed that fences may negatively affect wildlife by changing movement patterns and causing collisions. Wildlife movement patterns have already been established with the current fencing pattern that has been in place on the allotment for over 50 years. Fences have not caused any documented collisions with wildlife.

In addition, fences that have been constructed within the last 15 years have been constructed with wildlife in mind. The new design calls for the top barbed wire to be 42" high, which most deer can easily jump. The bottom wire is smooth, rather than barbed, and is required to be 16" off the ground. This allows for the younger wildlife to pass under the fence (EA, 19, 32, and 99).

5. Comment (Bark/ONRC p. 16):
It is a violation of the ESA to issue permits for grazing allotments without conducting a Biological Assessment to determine the impacts of permit issuance on federally listed species that may be present or affected by the proposed action [the comment letter focuses specifically on the Northern Spotted Owl].

Response:
As explained in the EA on page 95, 96, and 124, a Wildlife Biological Evaluation/Assessment was completed for the Long Prairie Environmental Assessment and is located in the project file. The Forest Service consults biennially with the US Fish and Wildlife Service through a programmatic biological opinion. The disturbance-related activities associated with the proposed action (such as the construction of range improvements) fall under the *Miscellaneous special uses (low intensity)* category in the US Fish and Wildlife Service's *Biological Opinion and Letter of Concurrence for Effects to Bald Eagles and Northern Spotted Owls for fiscal year 2004-2005 disturbance activities within the Willamette Province* (FWS Reference Number 1-7-04-F-0184). A Biological Assessment has also been completed for aquatic species and consultation with National Marine Fisheries Service (NMFS) has been conducted (EA, 89 and 131).

6. Comment (Bark/ONRC p. 16):
The FS must also determine whether lands within the proposed action area are important to the recovery of proposed or listed species. Recovery actions must be emphasized over extractive activities, such as continued grazing.

Response:
It is the responsibility of the US Fish and Wildlife Service to devise recovery plans for proposed or listed species, as a regulatory agency. The Long Prairie Allotment portion of the LSR may be included in the US Fish and Wildlife Service's new recovery plan for spotted owls; however, this plan is not yet complete and the Forest Service does not have that information.

7. Comment (Bark/ONRC p. 9):
The FS merely looks at the effects of disturbance related activities in its discussion of the cumulative effects on Northern spotted owl. The FS must consider habitat modification associated activities in addition to disturbance/harassment-associated activities.

Response:
As disclosed in the EA on page 91, there is no habitat modification with any of the action alternatives. The only potential effect to the Northern spotted owl is from noise-related activities such as fence construction. A discussion of effects to the Northern spotted owl from fences (owls getting caught in fences) was added to the EA based on comments received from Bark and ONRC (EA, 96).

<u>Riparian Damage/Water Quality</u>
8. Comment (Bark/ONRC p. 2-3, 8-9 and 14):
The fencing proposed here will not keep the cows entirely out of riparian areas, so it will not curb the water quality problems on this allotment. There is no guarantee that downed wood will prevent access to this 303(d) listed stream. Similarly, moving the corral location on West Fork

Neal Creek would merely transfer existing impacts, such as soil compaction and riparian vegetation loss, to another location within the riparian area. How will this minimize cumulative effects? Cows will still have access to the headwaters of North Fork Mill Creek and portions of WF Neal Creek so the FS claim that "full soil recovery" will occur along those creeks are exaggerated at best.

Response:

The proposed fencing would keep livestock out of the upper portion of North Fork of Mill Creek (south of proposed fence). The Gibson Prairie portion of North Fork of Mill Creek would have downed wood strategically placed to deter livestock use. This range improvement would be monitored as part of the adaptive management approach to test whether or not it will move riparian areas toward the desired future condition. If downed wood proved to be ineffective, adjustments would be made to deter cattle from the riparian areas (EA, 16 and 17). Livestock have access to two alternative water sources that hold more water later into the season than the headwaters of North Fork Mill Creek, which runs dry. Alternative water sources are strategically placed to coax cattle away from remaining riparian areas. Full soil recovery is expected in those areas where livestock access has been eliminated.

A separate Decision Memo was completed that would construct a fence at the headwaters of West Fork Neal Creek. This exclosure fence will be completed in September 2005. The new fence within Long Prairie Pasture will prevent cattle from accessing the stream within the pasture. An additional buck and rail fence exclosure at the western-most headwaters fork of West Fork Neal (analyzed as part of another NEPA document) will protect this area as well. Although cows would still have access to some riparian areas within the allotment, the areas most heavily-used by cattle in the past, which are also the most-sensitive headwaters areas, would be protected by fencing.

Monitoring

9. Comment (Bark/ONRC p. 3):

Monitoring should be conducted for all of these indicators before, during and after every season to adequately assess the impacts to the allotment resources and make changes accordingly. At the very least, all of the indicators should be monitored pre- and post- season once a year.

Response:

There are two types of monitoring: Implementation Monitoring which is evaluated on a short term basis, and Effectiveness Monitoring which is evaluated in the long term. Implementation Monitoring (short term) is monitoring the effects of the current year's grazing practices, outlined in the term grazing permit, and the Annual Operating Instructions, or the terms and conditions outlined in any local regulatory agency Biological Opinions. This includes, but is not limited to: pre-season range readiness (plant phenology and soil moisture adequate), improvement maintenance inspections, and monitoring of short term indicators (stubble height, bank alteration, woody browse). Currently, implementation monitoring is done during and at the end of each grazing season. Some in-season ocular monitoring is used as a trigger to indicate any pasture moves necessary to prevent any unforeseen resource damage. Long-term indicators reflecting resource condition (bank stability, greenline vegetation, and woody regeneration) would be sampled every 3-5 years, since these indicators take much longer to show a difference between years. A further discussion of monitoring indicators and timelines is discussed on pages 15-17 of the EA.

Impacts of the Proposed Action

10. Comment (Bark/ONRC p. 3-4):

The EA Contains an Inadequate Range of Alternatives. The FS failed to allow for any possibility between no grazing and current management, despite the well-documented riparian degradation occurring on the allotment. The FS should at the very least consider an alternative that would permit grazing but significantly limit the number of cows permitted to better protect degraded riparian areas. In addition, allotment retirements and voluntary and/or mandatory permittee conservation agreements are viable alternatives that should be considered in the analysis of alternatives.

Response:

An alternative that reduced the number of cattle on the allotment was considered by the interdisciplinary team but dropped from further study (EA, 10). A forage capacity study completed in 2005 by the Mt. Hood National Forest Range Conservationist found that forage production is not a limiting factor given the current level of grazing. Resource concerns raised in the purpose and need are based on the lack of distribution of cattle across the allotment. The identified high-use areas are addressed through the proposed action. Increasing carrying capacity is not ripe at this time because of distribution concerns, and would only be considered under the proposed action if the high-use areas showed a recovery trend. If distribution were to improve and a resource trend occurred, the effects of authorizing more livestock on the allotment would still be within carrying capacity limits and the effects of the increase should be similar to the existing impacts of 52 cow/calf pairs.

11. Comment (Bark/ONRC p. 5):

The FS is required to disclose the history of success and failure of similar projects (range improvements/fences).

Response:

Effectiveness of range improvements is disclosed on pages 32 and 66 of the EA. In addition, effectiveness of mitigation measures and BMPs is discussed on page 20 of the EA.

12. Comment (Bark/ONRC p. 5):

The FS has failed to disclose how the fencing would be erected. Presumably there will be impacts from placing fencing in more remote locations. The use of helicopters or off-road vehicles and the associate impacts were never disclosed or considered in the EA.

Response:

Further clarification has been added to the EA on page 37. Construction of the proposed fencing (barb-wire and wooden) involves little ground disturbance. The type of vegetation clearing can be done by hand with tools such as bow saws, loppers, or in some cases chain saws for cutting a path 3 feet wide through dead fallen timber. No trees larger than a 3-5 inch diameter would get cut. If a large tree is in the proposed fenceline, then a 2x4 wooden scab is used on this tree to act as a fence post. The fences identified in the proposed action would be located along roadsides, edges of meadows and old timber harvest units. This is done intentionally so there would be limited work clearing brush for a fenceline. This procedure also allows for better success for maintaining the integrity of the fence and prolonging the

effectiveness of the project. It also allows easier access for maintenance of the fence. There would be no use of helicopters, but there may be some off road vehicle use.

Economics

13. Comment (Bark/ONRC p. 6 and 12; Steve Blackmore email):

The NEPA document for this proposal fails to disclose the full economic costs to the USFS, Oregon, and all other public agencies resulting from: 1. Managing and monitoring this livestock grazing allotment; 2. Cost share agreements between the USFS and the permittees; 3. Restoration needed due to past livestock grazing on the allotment; 4. Restoration needed or in the likely foreseeable due to livestock grazing on the allotment; 5. All and any other financial or resource subsidies involved in the grazing allotment and its management processes. The analysis must explore alternatives that ensure the costs of managing, maintaining, and restoring this allotment are not borne by the public or federal treasury, but by the individual permittees who run commercial livestock operations. Please be sure your environmental assessment accurately measures the cost (both direct & indirect) of cattle grazing.

NFMA requires management of national forest system lands in a manner that "maximizes long-term net public benefits." Costs and benefits must be assessed not only from the perspective of the FS, but also from the perspective of "all other private and public" interests. The FS must meet the substantive requirements regarding economic analysis set forth in NFMA.

In this particular allotment, livestock grazing – from strictly an economic efficiency standpoint— does not serve the broader public interest. It is quite clear that the intent of NFMA regulations is to combine environmental and economic analyses that then enable the agency to maximize net public benefit.

Response:

An economic analysis is disclosed in the EA on pages 39-43. NFMA requires that the Forest Service conduct economic efficiency analysis by alternative to determine cost efficiency (36 CFR 219.3 and 36CFR 219.20b). NFMA does not require present net value to be positive for rangelands to be suitable. There are no specific criteria for determining suitability based on economic efficiency. This analysis is completed so that the decision maker is better informed and understands the economic trade-offs prior to making a decision.

The Forest Service Manual (FSM) 2212.03 (8) states that allotment management plans shall contain cost-effective analysis. This analysis provides a basis to judge the relative economic efficiency, and permittee and community economic effects resulting from changes in outputs from a proposed plan or project (FSH 2209.21 (10), 16.27 – R6 Amendment). A completed project effectiveness worksheet is located in the analysis file.

An EIS is Warranted

14. Comment (Bark/ONRC p. 7):

The FS utterly fails to discuss the degree to which grazing up to 105 cow/calf pairs will affect the safety of the public while using the forest for recreation purposes. Livestock can pose a serious threat to the public when encountered on a trail or at a camp, as has been extensively documented on allotments across the West.

Response:

No documentation was provided with the comment letter from Bark and ONRC. The recreation staff officer on the District researched this issue and could not find any literature stating that livestock pose a serious threat to recreationists. There are no documented cases of public safety on any allotments on the Mt. Hood National Forest, nor have any complaints been received in the past on this matter. The EA discloses the impacts to recreational users on pages 124 and 125.

15. Comment p. 10 (Erin):

The FS should prepare an EIS for this project because the impacts, when analyzed collectively, will significantly affect the quality of the human environment.

Response:

A Finding of No Significant Impact (FONSI), which evaluates the significance of the project's direct, indirect, and cumulative impacts, was completed for this project and is part of the Decision Notice. Cumulative impacts were considered in the effects analysis and considered when the decision maker made a finding of no significant impact (EA, 38, 39, 43, 46, 47, 66, 68, 69, 88, 96-100, 108-111, 113-118, 124, 125, 128-130; Decision Notice and FONSI, 7).

Cumulative Effects

16. Comment (Bark/ONRC p. 8-9):

The current analysis is incomplete because it looks at one activity at a time coupled with the proposed action, rather than the collective actions and their combined impact. The FS must examine the effects of past and reasonably foreseeable recreation, logging, roads, OHV use, fire suppression, development and other activities throughout the watershed. It must include the combined effects of the above activities on riparian vegetation recovery, streambank stability, stream temperature, and sedimentation. In addition, it must analyze the cumulative effects of 100 years of livestock grazing on this allotment and other allotments for which NEPA analysis is concurrently being conducted.

Response:

Cumulative effects are analyzed for the various functional groups, including: range management (EA, 38, 39); economic resources (EA, 43); noxious weeds (EA, 46, 47) water quality (EA, 66, 68, and 69); fisheries (EA, 88); soils (EA, 108-111); wildlife (EA, 96-100); botany (EA, 113-118); recreation (EA, 124 and 125); heritage resources (EA, 128 and 129). This effects analysis includes past, present and reasonably foreseeable future actions that are pertinent to each resource area. These cumulative actions are aggregated and analyzed on a variety of different scales depending on the resource. Reasonably foreseeable future actions are only included if there is a high likelihood of implementation and their effects have a relationship with the effects of the proposed activities in the Long Prairie Grazing Allotment EA.

Soils

17. Comment (Bark/ONRC p. 13):

Ground disturbing activities should not occur in saturated soil areas (MHNF LRMP, FW-083). The FS fails to discuss how these LRMP requirements will be met.

Response:

Saturated soils are most likely to occur in the spring season. Soil moisture is one factor in determining range readiness (when cattle can be turned-out in the spring) and past data shows that by June 15th the soils in this allotment are adequate for livestock turn-out. In addition, the goal of the proposed action is to exclude cattle from those areas with the highest risk of having seasonally saturated soils.

18. Comment (Kate McCarthy phone call):

The Surveyor's Ridge area in general is terribly fragile and I'm concerned about the erosion potential. There is already evidence of erosion and other damage done by mountain bikers on the Oak Ridge Trail. Additional erosion is probably from roads in the area.

Response:

As discussed in the EA, cattle rarely enter the Surveyor's Ridge area due to its steep topography (EA, 91, 103, 116, and 126). The potential for erosion was disclosed on page 103 of the EA. The cumulative effects of grazing together with mountain biking and road density are disclosed on 54, 64, 68, 94, and 100, 112-114 and 116-118 of the EA.

National Forest Management Act

19. Comment (Bark/ONRC p. 10):

The Forest Service must conduct a thorough analysis of the Long Prairie allotment's suitability for grazing prior to issuing term permits for the allotment [36 CFR 319.20].

Response:

Both a rangeland *suitability* as well as a rangeland *capability* analysis was completed as part of the EA (30 and 31). The capability analysis looks at the potential of an area of land to produce resources, supply goods and services, and allow resource uses under an assumed set of management intensity. Capability depends upon current resource conditions and site conditions such as climate, slope, landform, soils, and geology, as well as the application of management practices, such as silviculture or protection from fire, insects, and disease (36 CFR 219.3, and FSM 1905).

The capability analysis in the EA subtracted out areas of the allotment that were not capable of providing adequate forage to sustain livestock. These areas were; lakes, ponds, rivers, certain erosive soil types, slopes over 40%, fenced off recreation areas, roads, private land, and lands that lack the potential to develop water (1 mile radius). Then areas with an overstory of tree canopy and/or unpalatable shrub canopy cover of greater than 70% were subtracted out. Certain vegetative types (meadows, riparian areas, aspen groves, etc.) were prescribed for a certain amount of use (only 35% utilization) and were included in this analysis. All of these areas were sampled for three consecutive years to determine that average amount of forage they were capable of producing. The analysis determined that there was more than enough

forage to provide for the proposed action while providing adequate forage for wildlife and protecting other resources.

The area identified as the Long Prairie Allotment was determined to be *suitable* rangeland capable of providing livestock forage that may be considered for commercial livestock grazing where consistent with Management Area direction (Mt. Hood Forest Plan, FW-291).

20. Comment (Kate McCarthy Phone Call):
The Long Prairie area seems inappropriate for grazing because it is surrounded by meadows, riparian, and forested areas. The area might have been appropriate in the past, but not now with the increase of recreation in the area.

Response:
A suitability and capability analysis was completed as part of the Forest Plan and this EA (30 and 31). Please also see Response to Comment #21. Impacts to recreation are disclosed in the EA on page 114-118. The proposed action addresses concerns about cattle grazing near riparian areas and meadows (EA, 2-4 and 13, 14).

21. Comment (Bark/ONRC p. 12):
There is not evidence that the Forest Service has ever considered the relative environmental gains that could be achieved by closing the entire allotment to livestock use. Nothing in the plan shows that he FS considered that the area might be better suited to recreation than to grazing. In addition, the analysis must consider what changes in the levels and types of recreation would result from a discontinuation of grazing in portions of the allotment, or the entire allotment.

Response:
The area identified as the Long Prairie Allotment was determined to be suitable rangeland capable of providing livestock forage that may be considered for commercial livestock grazing where consistent with Management Area direction (Mt. Hood Forest Plan, FW-291). Currently, recreation is compatible with grazing and the area includes mountain bike, hiking, and horse trails. The impacts to these recreational uses were disclosed in the EA on page 124 and 125.

22. Comment (Bark/ONRC p. 12):
The Forest Service must maintain viable populations of MIS and sensitive species. The FS should conduct detailed population trends of MIS and sensitive species on the allotment.

Response:
The analysis of effects to management indicator species is found in the wildlife section (EA, 97-100) and the fisheries section (EA, 70). This proposal is consistent with the management direction for MIS species through the Mt. Hood Forest Plan. As discussed in the EA, the Forest contains sufficient habitat to provide for the needs of these species.

23. Comment (Bark/ONRC p. 13):
The LRMP requires that within a hundred feet of a riparian area, no more than 10% of a project activity area should have exposed or compacted soils and at least 95% of the effective ground cover shall be maintained, including in non-forested riparian areas (MHNF LRMP< FW-080; FW-082; FW-105; FW-123; FW-124). The FS fails to discuss how these LRMP requirements will be met.

Response:
As explained in the EA, the assessment of this allotment utilizes a high-use or point source type of analysis instead of total percent detrimental soil condition in riparian areas, as well as across the entire allotment. Field reconnaissance indicates that soil impacts are very localized and concentrated in sensitive areas within the allotment boundary. Relative comparison of conditions and watershed values coupled with an evaluation of impacts from the current livestock operation provided a basis for this analysis, resulting in many of the design features in the alternatives (EA, 101).

24. Comment (Bark/ONRC p. 14):
The EA acknowledges that the open road density standard is far exceeded on the allotment. Yet the FS says nothing about this violation of NFMA in its analysis.

Response:
No roads are proposed as part of this proposed action, and therefore the open road density will not be increased as a part of this proposal. The road density calculations were used for the cumulative effects analysis both in the hydrology section (EA, 64 and 68) and the wildlife section (EA, 94 and 100).

25. Comment (Bark/ONRC p. 15):
The Long Prairie NEPA document should analyze and include the effects of pesticide application [that may occur as part of the Forest EIS], which will be likely as a result of grazing.

Response:
There is no pesticide application being proposed as part of this EA. There is a proposal as part of the Forest-wide (Mt. Hood) Site-Specific Invasive Plant Treatment EIS that is currently in progress to identify invasive plant areas that would require treatment across the Forest. This proposal includes areas within the Long Prairie Allotment. The EIS analysis will analyze the effects of pesticide application and other treatments in the Long Prairie Allotment as well as other areas across the Forest. The Forest-wide Site-Specific Invasive Plant Treatment EIS is discussed on pages 38, 43, 44, 46 and 47 of the EA. There is also a more detailed description of the proposed action of the Noxious Weed EIS as it pertains to the Long Prairie area in the project file.

<u>Botany</u>
26. Comment (Bark/ONRC p. 5):
The EA fails to adequately disclose or even discuss the impacts of the proposed action on botanical species.

Response:
The impacts to botanical species are disclosed on pages 113-118 of the EA. In addition, a botanical Biological Evaluation was prepared and is in the project file.

27. Comment (Bark/ONRC p. 14):
The EA states that three R6 sensitive plants are on the allotment, but it fails to provide a discussion based on the LRMP standards. Although a couple of the species occur in Surveyor's Ridge, which will be minimally used in the proposed action, the EA lacks information about the effects of land management activities on the plant species.

Response:
Further discussion on the impacts to botanical species from land management activities has been added to the EA on pages 113-118. LRMP standards for botanical species are included in the botanical Biological Evaluation, located in the project file.

28. Comment (Kate McCarthy Phone Call):
There are beautiful wildflowers all along Surveyor's Ridge, and cattle in general are known to trample and graze down plants and wildflowers. Also, there are unique botanical species (such as lilies and trillium) in the forested area that could be damaged by grazing.

Response:
Effects to botanical species are disclosed in the EA on pages 113-118, including cumulative effects of other activities along Surveyor's Ridge (such as mountain biking and hiking). As discussed in the EA, cattle rarely drift to the Surveyor's Ridge area because of steep topography.

Aquatic Conservation Strategy
29. Comment (Bark/ONRC p. 17):
Other than stating the harvest levels of the reserves and listing the applicable standards and guidelines in the NWFP, the FS fails to discuss how the proposed action will meet the Aquatic Conservation Strategy requirements. The proposed action fails to meet the ACS for the following reasons: Physical integrity of the aquatic ecosystem; Sediment regime of the aquatic ecosystem; Riparian plant communities; and Flow characteristics.

Response:
Discussion of consistency with the Aquatic Conservation Strategy objectives has been added to the EA on pages 56 and 89. The project is devised to contribute to maintaining or restoring the fifth-field watershed over the long term through the design of range improvements that would exclude cattle from an important drainage, and contribute to better distribution across the allotment and away from riparian areas.