

Appendix C – Scoping Comments, Ice Caves Grazing Allotment

Name	Comment
Washington Department of Fish and Wildlife	<p>Requests:</p> <ul style="list-style-type: none"> ▪ Summary of the riparian monitoring program from 1993–2002. ▪ Are there effects from livestock grazing on wild ungulates – “requests that this question be thoroughly addressed as part of the ... EA”. <p>Recommendations:</p> <ul style="list-style-type: none"> ▪ Limit grazing on habitats where [the mardon skipper] occurs. <p>Questions:</p> <ul style="list-style-type: none"> ▪ Allotment area been surveyed for mardon skipper? ▪ How many sites have been located? ▪ Mardon skipper habitat exist and has it been mapped? ▪ What is condition of fences at Peterson Prairie and Cave Creek, and how often are the fences patrolled and maintained? ▪ How will USFS maintain mardon skipper over the long term? ▪ Have amphibian surveys been conducted on allotment? ▪ Can USFS clearly demonstrate that the grazing of domestic ungulates does not have a detrimental effect on wild ungulate pops?
GP Task Force	<p>Recommendations:</p> <ul style="list-style-type: none"> ▪ close the allotment <p>Requests:</p> <ul style="list-style-type: none"> ▪ clearly state the need to retain the Ice Caves allotment <p>Questions:</p> <ul style="list-style-type: none"> ▪ Is livestock use consistent with the S&Gs related to LSRs ▪ and how grazing ... is consistent with the goals of the NWF Plan.
Andrea Raven, Berry Botanic Garden	<p>Recommendations:</p> <ul style="list-style-type: none"> ▪ strongly recommend considering the removal of cattle from all pale blue-eyed grass (SISA) sites in the ... Forest. ▪ Use wildlife friendly fences that lay down in fall ▪ Place locks on gates to reduce vandalism. ▪ Consider developing a grazing rotation system that provides at least 2 years of rest for SISA populations. ▪ Reduce stocking level at South Prairie and Cave Creek ▪ Highly recommend implementing a scientifically defensible monitoring plan to evaluate SISA and habitat response to management actions. ▪ Consider impacts of grazing on South Prairie bog and other sensitive species. <p>Questions:</p> <ul style="list-style-type: none"> ▪ Does <i>Cypripedium fasciculatum</i> occur on the allotment, and what is the impact of grazing on this plant?
Northwest Ecosystem Alliance	<p>Requests:</p> <ul style="list-style-type: none"> ▪ Request an EIS to more accurately determine full environmental impacts. ▪ Impacts of grazing on introduction and dispersal of noxious weeds be evaluated and described in upcoming analysis.

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	<ul style="list-style-type: none"> ▪ The analysis should include the names and locations of all streams and ponds near cattle grazing areas. ▪ Request analysis address how grazing and handling of cattle impact meadow-dependent species, including deer and elk that compete for forage. ▪ Demonstrate with analysis how the implementation of project will not “retard or prevent attainment” of all ACS objectives. ▪ Request for information on how the Cave Bear Creek Watershed Analysis was used as a basis for developing this project. ▪ Indicate in analysis which areas will be grazed and location in respect to riparian reserves. ▪ Identify the locations of livestock managing and/or handling facilities by identified in the analysis. <p>Questions:</p> <ul style="list-style-type: none"> ▪ What are impacts of grazing on SISA? Effects of trampling, noxious weeds and soil compaction on this species? ▪ What are impacts of sedimentation and lost riparian vegetation on aquatic organisms? ▪ How are resident trout impacted by cattle-caused erosion that increase sedimentation? What are the impacts of fecal matter entering streams? ▪ Impacts of noxious weeds on this species and mardon skipper? ▪ How will grazing practices be monitored or modified to ensure that current stream bank conditions are maintained? (as required by ACS ROD B-10). ▪ How will sediment regime of aquatic systems be maintained or restored if allotment permit is renewed? (as required by ACS ROD B-10). ▪ How will grazing be managed so that populations of native plants in Riparian Reserves are maintained and restored? (as required by ACS ROD B-10). ▪ Have any changes in grazing practices been made to ensure that current environmental conditions are maintained in Riparian Reserve areas? ▪ What monitoring or regulating measures will be taken to ensure that the ACS objectives are met? ▪ How will grazing on LSR protect or enhance conditions of late-successional and old growth forest ecosystems?
Stephany Anderson	General comment: use grazing as a tool for habitat enhancement where appropriate; prioritize caring for SISA and mardon skipper on allotment.
Klickitat County Board of Commissioners	<p>General comments:</p> <ul style="list-style-type: none"> ▪ Pastoral open space one of greatest visual assets; grazing helps maintain. ▪ National Forest grazing permits are key components if not the deciding factor in keeping ranches viable and existing. ▪ Ranches should be allowed to continue as they have for

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	<p>generations, based on opinion that grazing is beneficial to the multiple use, and health of timber and grasslands.</p> <p>Recommendations:</p> <ul style="list-style-type: none"> ▪ Strongly recommends continuation of Ice Caves allotment.
Don A. Roberts MD.	<p>Recommendations:</p> <ul style="list-style-type: none"> ▪ Cattle could be placed on the allotment in late July or early August, which would allow [SISA] seed to set and be dispersed before grazing occurs. ▪ Alternatively, do not renew the allotment. <p>General comments:</p> <ul style="list-style-type: none"> ▪ Noxious weed introduction are probably carried to allotment every year. ▪ Fencing cannot be relied on to protect sites. ▪ Concern that grazing could move the species [SISA] to endangered then extinction.
Matt Gordon	<p>General comments:</p> <ul style="list-style-type: none"> ▪ Need to protect the areas where SISA is growing until the surrounding land returns to a more ecologically sound state. <p>Recommendations:</p> <ul style="list-style-type: none"> ▪ Eliminate grazing from areas where SISA now exists.
George Hinderliter	<p>General comments:</p> <ul style="list-style-type: none"> ▪ Supports grazing. ▪ Not concerned about cattle introducing noxious weeds. ▪ State of rangeland looks good to him.
Julius A. Courtney	<p>General comments:</p> <ul style="list-style-type: none"> ▪ Isn't concerned about state of SISA or mardon skipper because they "survived through much heavier livestock use that is now being experienced". <p>Recommendations:</p> <ul style="list-style-type: none"> ▪ Continue allotment as now designated, and re-issue to Dan and Joan Frey.
Jack Roscoe	<p>General comments:</p> <ul style="list-style-type: none"> ▪ Overgrazing a concern. Observed areas with vegetation grazed right down to the roots. ▪ Lack of cattle movement a concern. Same cattle that are dropped along Forest Road 8620 remain through the permit period. ▪ Riparian damage is a concern. Have observed major damage to stream edges, defecating in streams, and stripping the vegetation from these areas. ▪ Season of use/non-compliance with AOI. Cattle are never off the allotment in compliance with timelines and terms in AOI. Observed Frey's picking up cattle on November 23 during one year. ▪ Concerned about lax administration of terms of permit that will allow non-compliance with AOI. ▪ Economic benefit to FS doesn't justify impacts caused by grazing.

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Xerxes Society	<p>General comments:</p> <ul style="list-style-type: none"> ▪ Livestock grazing may cause adverse impacts to mardon skipper by (1) trampling eggs, larvae, pupae, and adults, (2) eating larval and adult food sources, and (3) disturbing the soil, which allows weeds to invade. ▪ Cattle effects not likely to be beneficial to mardon skippers. ▪ Two sites in Mt. Adams area used by mardon skipper observed to be trampled and sparsely vegetated as a result of grazing. ▪ Cattle incursion into Cave Creek has been observed. <p>Recommendations:</p> <ul style="list-style-type: none"> ▪ FS should determine how many sites and how much suitable habitat is located within the allotment before permit re-authorization, and document same. ▪ Sites would then be effectively excluded from cattle grazing through fencing and other means of effectively keeping cattle out. <p>Requests:</p> <ul style="list-style-type: none"> ▪ The impact of cattle grazing on mardon skipper needs to be assessed as part of the EA.
USFWS	<p>General comments:</p> <ul style="list-style-type: none"> ▪ Livestock grazing can directly and adversely impact Mardon skippers (federal candidate species) by trampling and feeding on the same grasses as the butterfly. ▪ Similar impacts to pale blue-eyed grass that should be addressed in the EA. ▪ Concerns for chinquapin hairstreak butterfly, associated with golden chinquapin, which may be present in the Allotment. ▪ Petersen Prairie (north meadow) may contain the single largest population of Mardon skippers in WA. <p>Recommendations:</p> <ul style="list-style-type: none"> ▪ Include chinquapin hairstreak butterfly in analysis, even though cattle may not graze on golden chinquapin. ▪ Complete the analysis of impacts to S&M species. ▪ Consider alternative which provides fencing to completely exclude grazing from Mardon skipper sites. ▪ Follow conservation measures for species of concern and candidate species, even though they are voluntary. ▪ Conduct surveys of potential habitat for Mardon skipper and pale blue-eyed grass and assess impacts.
Eugene and Connie Baugher	<p>General comments:</p> <ul style="list-style-type: none"> ▪ Support continued grazing on the National Forest and in the Allotment. ▪ Cattle can help with brush control and round-ups provide entertainment for tourists.
Ann Musché and Alan Richards	<p>General comments:</p> <ul style="list-style-type: none"> ▪ Disturbed to see the degree which cattle destroy native plants by trampling and limiting flower and seed production, specifically

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	<p>pale blue-eyed grass.</p> <ul style="list-style-type: none">▪ Cattle also speed the introduction of competing exotic species.▪ Concerned for wet meadows and riparian areas, in particular South Prairie bog.▪ Mardon skipper is likely to suffer with cattle presence because of the introduction of invasive plants which outcompete natives.▪ Mitigation through creation of wetlands tend to be failures. <p>Recommendations:</p> <ul style="list-style-type: none">▪ View proposals to mitigate where wetlands are concerned with caution.▪ Limit or eliminate grazing on public lands.