



1/10/23

RE : Objection to Santa Rosa Rangeland Management Project

Lead Objector: WildLands Defense

Lead Official: Boyd Hatch, Santa Rosa Ranger District District Ranger, Humboldt-Toiyabe National Forest

Deciding Officer: William Dunkelberger, HTNF Forest supervisor, USFS 324 25th St. Ogden, UT 84401

Comments submitted to:

Also submitted on CD.

This Objection to the Santa Rosa Rangeland Management project section is based on comments and ecological and other environmental concerns and scientific documents WLD previously submitted in this process, for example as submitted as included below, to assist in demonstrating the EA and proposed action violations of NEPA, NFMA, many other environmental laws and agency policies - and common sense and reason. Our submissions help to illustrate the contradictions, inconsistencies, lack of rational basis and common sense of the Santa Rosa RD proposal in imposing chaotic and highly uncertain severely damaging grazing scheme, and many other failures of the 2022 SRRD project. They include some details information presented in the preceding USFS Martin Basin EIS Process that was ignored, down-played and/or inadequately assessed for environmental impacts in this minimal self-serving and blindered 2022 EA. Due to document size, we are breaking our objection down into two parts. This is PART ONE.

It is also a great disservice to informed decision making and public process for the FS to ignore providing the public with a Draft EA for comment, fail to provide a draft EA with a range of reasonable alternative actions, and include a different action (45% utilization vs. 4 inch stubble height) than it ever informed the public about in scoping, and to fail to include the current action and application of Forest Plan amendment 2 with varying grazing changes in the range of alternative actions. The FS failed to even include current grazing as an alternative and the second grazing 'alternative' of 45% utilization was not know either at the time of the Scoping Notice. We Object to this. Further, at the time of comments on scoping, when WLD tried to post comments on-line, the FS's website would not let us finish posting. How many other members of the public faced this obstacle too??? Thus the public has not had a chance to comment on these important issues. Please review to Judge Miranda Du's decision regarding the 2015 greater Sage-grouse plans where she ruled that an agency can't spring a new action on the public at the final NEPA review stage. Please also refer to a recent news release where a similar Forest Service livestock grazing increase EA in the Tonto Forest was withdrawn by the agency. <https://www.azcentral.com/story/news/local/arizona-environment/2023/01/13/forest-service-pulls-approval-of-a-plan-to-allow-more-grazing/69803979007/>

“The plan would have authorized up to 1,900 new cattle and supporting infrastructure on the Hicks Pike Peak Allotment located in the ecologically diverse Salt River Canyon Wilderness Area”.

Similarly, here in the Santa Rosa Ranger District, based on an even more deficient EA than that in Arizona, the FS allows for significantly increased cattle grazing all across the Paradise Peak Wilderness, in ESA-listed Lahontan Trout habitat on very small drought and climate-change stressed streams, and in some of the last remaining sagebrush Sage-grouse habitat over a vast area where 450,000 acres just burned in the Martin Fire, and where a very significant cheatgrass and now medusahead sagebrush habitat dooming weed risk is present with continued high levels of cattle grazing and trampling disturbance.

We describe throughout this Objection that there are so many glaring problems with this minimal EA that it must be withdrawn, and an EIS that actually serves to recover and restore critical LCT, Sage-grouse, migratory bird and other habitats, protect Wilderness and cultural values, and honestly address how climate change, drought and other stresses and threats amplify and exacerbate the harmful impacts of continued livestock grazing in these stressed arid lands.

WLD had submitted documents related to ecological issues and concerns from the Martin Basin EIS and the substantial and numerous ecological issues and concerns raised by the public to carry forward in regards to this current EA scheme in the context of the past Martin Basin debate. Previous comments on that EIS process also helps ot exposes the continuing lack of current baseline and monitoring data on nearly all facets of the environment in the current Santa Rosa project; to highlight the need for an EIS for any change as significant as the EA would make – gutting amendment 2 over a much larger land area than the MB EIS which retained amendment 2 now many years later as the Sage-grouse and other sensitive species populations continue to plummet and habitats face grave new and much greater weed and climate stresses. The FS years ago recognized that to attempt to assess all direct, indirect, cumulative, additive and synergistic effects of those more limited grazing actions that Martin Basin analysis required an EIS. And again., it did not gut Amendment 2 and it covered significantly fewer allotments and was conducted at a time of less climate, drought, species endangerment and fire/agency treatment and development stress. This current process lacks is not a fair and honest NEPA process. The EA: ignored a reasonable range of alternatives including WLD’s alternative submission under NEPA; lacks a credible “hard look” analysis under NEPA including honest assessment of the current degree of livestock caused and/or exacerbated environmental degradation of terrestrial and aquatic habitats and processes; sweeps the severity of impacts and risks of undue degradation and irreparable harm resulting from the chaos-based increased and expanded cattle use and facility impacts and associated with climate stress on lands/waters/biota/public uses, as well as the mega-drought stresses on top of the ecologically devastating levels and methods of grazing disturbance already taking place as well as to be imposed under this 1950s era grazing scheme under the rug

including by failing to take a hard look at host of current ecological science. The EA greatly lacks essential baseline environmental information, under NEPA and will result in: violations of the Migratory Bird Treaty Act; violations of BGEPA; violations of the ESA jeopardizing the persistence of LCT in the affected watersheds; violations of the Wilderness Act; violations of NFMA; failure to prepare an RMP amendment as this scheme guts Amendment 2 and other protective elements of the Forest Plan and it is unclear if the amendments proposed will gut amendment 2 Humboldt-Forest wide; the HTNF's shocking disregard for grazing disturbance and degradation to sensitive and important aquatic and terrestrial biota and to cultural sites; violations of the Clean Water Act and the DR's overall abandonment of the rule of reason. There is also the EA's extreme lack of a hard look analysis at this critical habitat area for sagebrush species- Sage-grouse, Pygmy Rabbit (note WLD's Fite documented purposeful destruction of occupied Pygmy Rabbit burrows in a sagebrush destruction project in the past – and the FS claimed it was a contractor "mistake), Brewer's Sparrow, Sage Sparrow, Sage Thrasher, Loggerhead Shrike, Burrowing Owl, Long-Billed Curlew and also Northern Goshawk, Flammulated Owl and a host of migratory bird associated with Aspen forest habitat. This remaining SRRD habitat has become even more crucial for Sage-grouse and other sagebrush species survival following the immense Martin Fire of 4 or so years ago. We Object to each of these EA deficiencies. We Object to the FS breaking many assurances made in its land use plan for protection of Sage-grouse and other sensitive species habitats and populations, and the FS has no way to even understand the significance of its actions and the risk of undue degradation and irreparable harm – as it forsook crucial systematic CURRENT baseline inventories of ecological conditions needed to understand the habitat quality, quantity and threats these species all faced. At the time of the Martin Basin EIS - mid 2000s and much earlier spotty site data, significant public concerns were expressed about the lack of adequate current data for that project. Now here we are many years after that project, and the SRRD attempts to limp along with minimal current environmental condition and species habitat information, and never even bothered to plug the data gaps raised by commentators (Fite when with a different environmental organization) back in the Martin Basin SRRD grazing EIS process.

Organizational Statement and Standing

WildLands Defense and our members work to protect and destroy biodiversity and public wild lands in the Interior West, including the beautiful but cow-battered and desertifying Santa Rosa RD. WLD is substantially harmed by the proposed chaos-based grazing scheme that will decimate Sage-grouse, Pygmy Rabbit, Migratory birds, rare plant, LCT and other rare biota. This scheme appears to purposefully gut Amendment 2, the Sage-grouse Forest plan amendment, and other Forest Plan protections. WLD submitted a reasonable alternative that was ignored by the SRRD whose leaders are very closely allied with the cattlemen. It seems that this this entire NEPA process was designed to reach a fore-ordained conclusion. The failure to take a hard look at current ecological science and the degree of risks of increased flammable invasive grasses and losses of

water flows from the area's tiny streams, springs and meadows appears rife with corruption and blind bias towards a tiny number of aggressive local cattle interests and forsakes environmental and conservation interests. At least 10,000 acres (and maybe more) across many of the allotments crucial riparian habitats were acquired for CONSERVATION PURPOSES – not to be sacrificed to local cattlemen greed.

The SRRD EA FS single-minded blindness to the irreversible weed invasions and other grazing harms in this arid climate and drought-stressed landscape being swept by cheatgrass and bulbous bluegrass, and now the scourge of medusahead shows great agency bias towards the desires and profits of a tiny hand full of cattle interests – at the expense of all other values of the National Forest lands. We Object to the lack of a basis and explanation for stocking under the EA potential actions.

Grazing causes excessive amounts of bare soil, forest understory litter and ground cover loss, soil carbon and nitrogen depletion, etc. Soils and microbiotic crusts are churned and disrupted by livestock trampling. Grazing also causes riparian area degradation and habitat and flow loss. Allotments are often significantly overstocked. Often the native herbaceous plant community is greatly below potential and increasers and weeds dominate the community. Livestock water developments and fencing create highly damaged areas as cattle congregate around them, destroy native vegetation and prime soils for weed infestation and site dominance of irreversible annual flammable grass and other weeds. Fleischner 1994, Belsky et al. 1999, Belsky and Gelbard 2000, Connelly et al. 2004, Dobkin Declaration, Sada et al. Tech. Bull. 2001, Chuong et al. 2015, Reisner et al. 2013, Williamson et al. 2019/2020, Fusco et al. 2020, Kerns et al. 2020. The Project will drastically impact a large land area for a long period of time - and potentially forever if irreparable damage occurs and lands suffer irreversible weed infestations, excessive soil erosion, stream/drainage entrenchment and downcutting, loss of sustainable perennial flows, or steep declines or local extinction of rare species occur when crucial habitat elements are drastically reduced and habitats extensively fragmented by the project. It is essential that an EIS be prepared. How long will it take to recover the structure and complexity of the woody vegetation communities and plant species to be destroyed? We Object to the failure to take a hard look at all of these significant concerns, and the failure to take a hard look at irreversible and irretrievable impacts. We also Object to the lack of a valid economic analysis that must include the value of the lands, habitats, watersheds adversely impacted, and the costs to restore - if even possible damaged watersheds or wildlife population in areas where grazing and grazing-associated weeds and other consequences of intensive cattle disturbance wipes them out.

The public, including our members, who use and enjoy the Forest lands for many aesthetic, recreational, scientific, spiritual and other interests and pursuits. Our members, greatly value the native vegetation communities that the project will degrade and/or destroy, and cause to become infested by cheatgrass and other weeds exacerbated by high

levels of chaotic cattle stocking and exploitative use. We also incorporate all of the referenced scientific information and concerns of the standing statement into this Objection as

EA Forsakes Conservation Purposes of SNPLMA Acquisitions of Key Riparian and Other Habitats Across Many Areas by Intensifying Cattle Use and Impacts to Conservation Acquisitions negating the Purpose for Which Lands Were Acquired

Around the time of the Martin Basin EIS, at least 10,000 acres in the SRRD were acquired with SNPLMA funds - much of the land had important riparian values. It was acquired specifically for Conservation purposes. These were “Nevada First” ranch private lands. They consisted of a complex pattern focused on riparian areas and were to restore those sites fish and wildlife and the public interest. Some were fenced in and intermingled with FS managed lands and some were not - but there was never baseline information on ecological conditions on the acquired lands, or of stocking on these lands, exchange of use, etc. presented in the old Martin Basin EIS process, or any other FS analysis – instead there were promises of future analysis – which never happened, just like the systematic monitoring promised in the Martin Basin EIS never happened. The Forest is acting in bad faith by imposing a host of negative EA actions on Conservation lands, including lands that have not had baseline ecological condition monitoring of any kind – ever.

Past SRRD DR Jose Noriega testified about some of the acquisitions here:

<https://www.leg.state.nv.us/App/InterimCommittee/REL/Document/21151?rewrote=1>

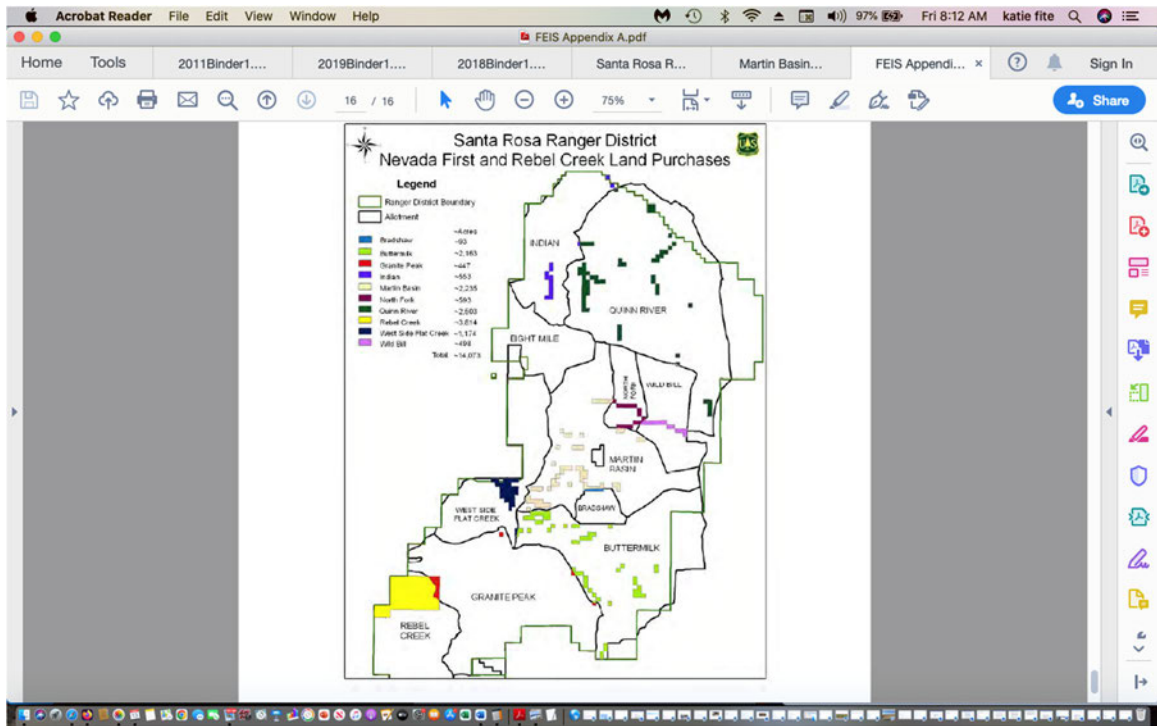
It is critical to understand that these SNPLMA lands were purchased for the Forest Service as “mitigation” for the disposal/development of BLM public land in Nevada. The acquisitions were for conservation purposes. The SNPLMA lands contain critical habitat for sensitive and MIS species, and ESA-listed LC T. The lands for were NOT acquired for the purpose of increasing head months and expanding cattle degradation, expanding use periods during very harmful periods for wildlife and watersheds, gutting Amendment 2 nor for expanding cow facility development with expanded spring-gutting, fencing, and industrialization with livestock facilities – as regrettably this EA proposed action would do. We Object to the lack of a hard look analysis at the full range of adverse direct, indirect, cumulative, additive and synergistic impacts to CONSERVATION purpose lands. For example, as shown in this video:

<https://www.youtube.com/watch?v=CA0FZ41R2mY>



Around 3 years ago, WLD site visits had found continued and often expanding high levels of cattle degradation to Martin Basin area and other requested mapping information

Here is a SNPLMA acquisition map, also showing a Rebel Creek acquisition for which no data was provided in the EA:



We Object to the lack of current systematically collected data and analysis of the ecological condition and threats to all SNPLMA and other lands acquired for Conservation purposes, and the complete lack of a hard look analysis and where and how these specific lands are being grazed, and lack of a science-based honest analysis of the adverse environmental impacts of all aspects of this chaos-based EA on these lands.

Livestock Trampling Impacts and degradation to Habitats and Watersheds Forsaken In EA's Deficient NEPA Analysis

An EPA letter on 10% bank trampling and FS commitment to the standard in the Martin Basin EIS process states:

<https://archive.epa.gov/region9/nepa/web/pdf/martinbasinrangelandfeis.pdf>

"EPA commends the Forest Service for a modification made to the proposed project in the Record of Decision that should address the issue of greatest concern to the Agency, the effects of the Martin Basin grazing allotments on water quality and the recovery of the Lahontan cutthroat trout. Establishing a 10 percent maximum stream bank disturbance criterion for all streams inhabited by Lahontan cutthroat trout is a crucial mitigation measure that should increase the trout's population in the Martin Basin Rangeland Project area".

Review of some SRRD AOIs since that time shows the Forest ignored applying trampling standards, even in Wilderness. In fact, the FS has been stripping more and more protections from AOIs over the years. See various 2016, 2022 and other AOIs on lit cd with this Objection, and as discussed below. We object to this. See WLD Fite e-mails and photos in recent years, and e-mails and photos Fite has submitted to the SRRD over the years showing gross cattle degradation impacts and degradation to stream, spring and upland habitats – including extensive evidence of trampling and soil erosion and degradation from trampling. This EA would allow even higher numbers of cows which would increase bank and upland tearing. We will separately discuss the weed-causing irreversible adverse impacts caused by cattle trampling in upland habitats. The various expanded livestock projects of the EA only serve to shift and intensify gross trampling impacts into other areas that become more heavily degraded – yet the EA ignored such reasonable protective standards. We Object to the lack of a fair, hard look NEPA analysis and a lack of a reasonable range of alternatives for these and a plethora of other matters discussed in thus Objection. Excerpts from some of these AOIs and other documents highlighting EA deficiencies will be contained in part 2 of this Objection.

Trampling is a hugely destructive impact not only to LCT streams- but also to the SRRD's often tiny springs, seeps and cow-degraded streams that are crucial Sage-grouse brood habitat across the SRRD and surrounding BLM lands (soil compaction = less moisture retained, rips apart grasses/sedge/forb roots and causes quick site drying and exposing trampled soil to erosion, collapses stream banks resulting in sedimentation and water pollution, et. See Belsky et al.1999 riparian paper, WLD's e-mails and photo-documentation of degradation across riparian habitats and WLD's alternative submitted in scoping specifically include bank trampling standards as triggers for livestock removal from pastures– but the FS failed to analyze reasonable protections for watersheds and sensitive species across the SRRD landscape.

WLD submissions also included an old 2010 Martin Basin Appeal (in the pre-Objection days). Then there was segmented subsequent “wilderness” analysis in a piecemeal EA.

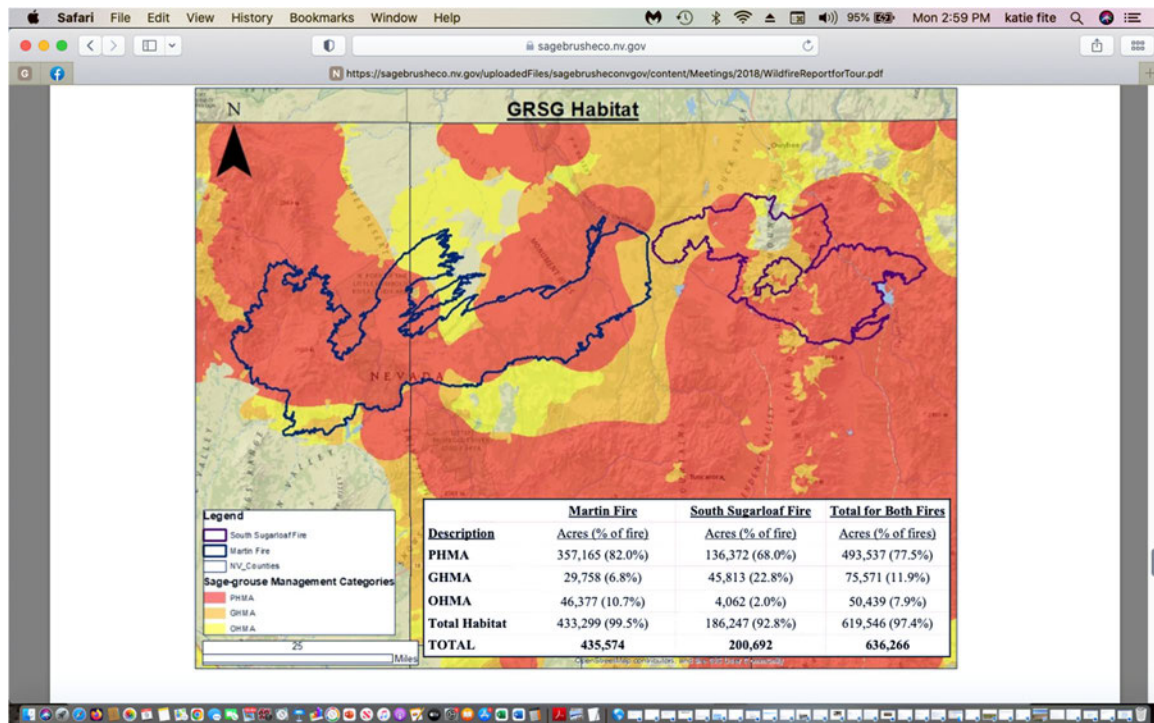
Sage-grouse and other Sensitive and MIS Species Forsaken – Violations of NEPA, NFMA, BGEPA, Migratory Bird Treaty Act, ESA

The minimal self-serving EA and associated documents lack a hard look analysis at the significance lek and grouse habitat maps circa 2008. A major concern is late winter-spring grazing on top of lekking and nesting grouse and spring trampling damaging the dying wet meadows and springs too.

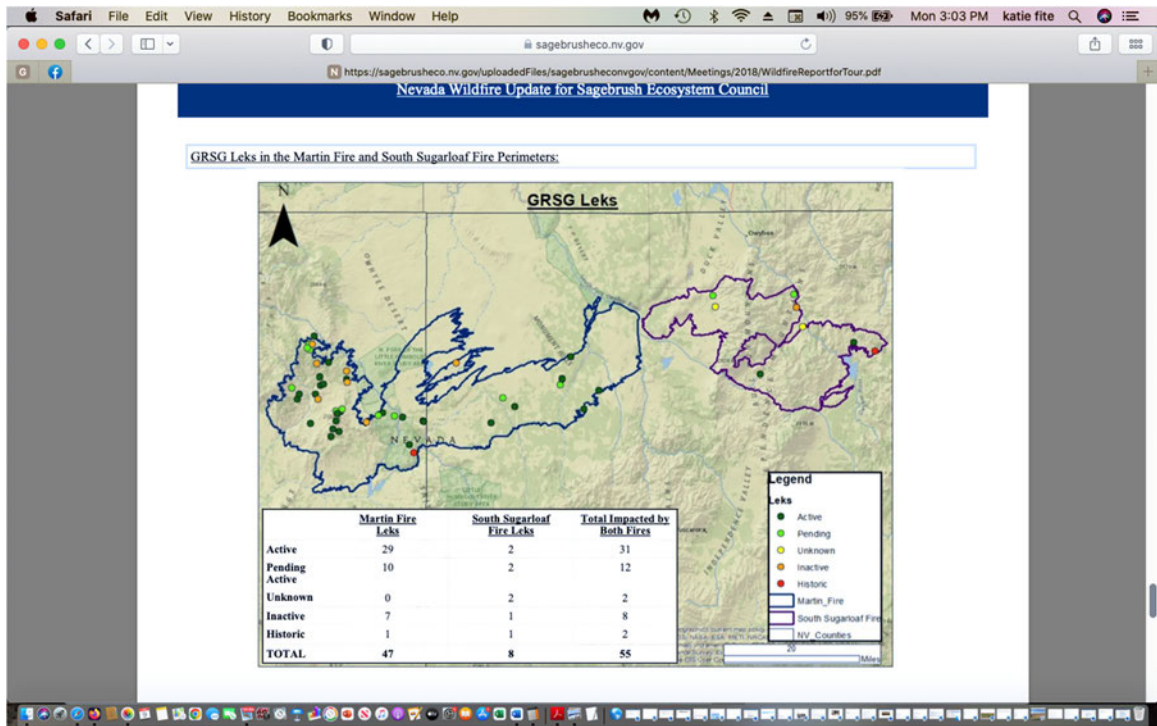
Attached and pasted below are circa 2008 NDOW lek and GRSG seasonal habitat maps - just as an example of the importance of the SRRD northern western and northwestern-central area - now in 2023 even more-so --- following the Martin and other fires. Of course, some more leks were likely found with the super-intensive surveys focused on justifying non-listing leading up to 2015 but the Martin Fire was after that, And in 2012,

there was the Long Draw Fire (circa 2012 - same year as Holloway Fire— both totaling 750,000 acres of sagebrush lands burned) that took out lots of sage in the flammable weed-vulnerable country on both sides of Highway 95 in Oregon to the north, and numerous smaller Oregon fires out in the West Little Owyhee/Louse Canyon country to the north.

The Martin Fire. – 450,000 acres impacting the very same Sage-grouse PMU (NDOW population management unit) as SRRD lands, and burning areas of many leks, and nesting, wintering and other crucial habitats.



So the bottom line is that the Santa Rosa country has become greatly more important for Sage-grouse persistence and viability since the old Martin Basin EIS process. The last thing it needs is chaos-based closed door grazing “management” with increased cows, gutting of amendment 2, expanded season of use on top of leks lek and early nesting habitat, and cows out until November when there is no chance for any regrowth on grazed riparian areas and no controls whatsoever on trampling levels on springs, seeps, and tiny streams.



The above information from a report to the NV sagebrush Ecosystem Council shows the Martin Basin fire burned 29 active leks in 2018! This is a huge blow to the population, and it will take many decades to achieve the mature and old growth big sagebrush cover required for Sage-grouse nesting, Brewer's Sparrow nesting, Sage sparrow nesting, Sage Thrasher nesting, loggerhead Shrike nesting, Pygmy Rabbit occupancy – if recovery even is possible given the continued high levels of grazing pressure and the fact that grazing causes cheatgrass/medusahead and many of these areas are highly likely to become dominated by cheatgrass, truncating chances of sage recovery. Williamson et al. 2019/2020 Abstract p. 1. Connelly et al. 2004 *Sage-grouse Conservation Assessment*, Knick and Connelly, eds. 2009/2011 *Studies in Avian Biology* Chapter by William Baker describing the very long time period required for sagebrush recovery. We Object to the failure to take an integrated and hard science-based look at the large-scale loss of Focal, Priority and other crucial sage-grouse habitats essential for persistence of the PMU/BSU

2015 GRSG NV BLM Priority habitat (dark purple) and Focal habitat (dark purple with diagonal). So when you look at the SRRD, the northern and north-central areas to the east of the range crest are shown as Priority, but not as Focal - I believe simply because they are FS and not BLM lands. But they were as critically important in 2015 for Sage-grouse- and now much moreso - than a lot of the burned BLM.

Also, there has been a never-ending series of CXs and little exclosures that serve to shift and intensify grazing and trampling impacts onto other areas as well as provide lethal structures for grouse and owls to collide with and die and also provide perches for

predators and zones of livestock concentration that facilitate weed expansion, see Connelly et al. 2004 sage-grouse conservation Assessment describing some of these many adverse impacts of fences. Rather than actually protecting little band aid exclosure areas by removing livestock the FS in association with its segmented piecemeal series of CSs has resorted to rock dumping in headcuts while allowing cows to continue to stomp meadow/spring stream sites to death. This had led to further meadow desiccation and overall desertification as the areas where rocks have been dumped have dried out and no longer sustain surface water, and with continued grazing the cows concentrate even worse on surrounding areas. There has never been any integrated NEPA analysis assessing the adverse impacts of the host of piece-mealed cow projects. No integrated NEPA analysis has taken place, and the EA continues in this long tradition of no complete look and sweeping diverse livestock facility impacts on Sage-grouse and other animals and ecosystem processes under the rug. How much shifted and intensified degradation, and how much “take” of Sage-grouse, migratory birds, raptors has resulted from the never-ending fencing proliferation and the chopping up of allotment lands with little pastures (see Granite Peak map for example? We Object to the FS failure to take a hard look at the EA’s significant direct, indirect, cumulative and synergistic Sage-grouse habitat and population impacts and threats facing the local and regional population of sage-grouse and other sensitive species, and the failure to ensure compliance with the Forest Plan and Sage-grouse EIS and its own sensitive species and MIS policy. The FS EA ignores that the FS contains a specific number of sage-grouse that must be present to comply with that plan’s MIS requirements. Yet the EA is dead silent on bird numbers throughout.

Post-Martin Basin EIS (note that much MB data was already quite old by the time the supplemental EIS came out), the FS also acted to expand and intensify OHV disturbance – by putting in named OHV routes on jeep trails (complete with OHV-sized cattle guards so riders don’t have to open gates but the rest of the public does) on the very dense roading in the midst of crucial Sage-grouse lek and nesting habitat lands and roadless area lands. The EA does not even provide mapping showing the plethora of facilities or the accompanying host of on the ground driven-in routes associated with the cow facilities and rampant salt/supplement feeding tearing up sagebrush uplands. OHVs can zoom through, but non-OHVs have to open gates – allowing them to cover more country even faster – and have a wider Sage-grouse and other wildfire disturbance footprint during crucial periods AND these routes are open year-round – unlike just about every other place in the West which has closed routes near Sage-grouse leks and nesting habitat from march to or through June, Here in the SRRD it’s always open season for disruptive travel through grouse habitat on dense roading in areas near many of the leks. This was the result of a Travel Planning process that left just about every two track open to motorized use and has not enforced continued expansion of routes all over the place. The FS put in a series of ATV routes on minor roads that had previously been minimally traveled - and these do indeed get a bunch of spring use – for marmot killing and the like – throughout critical habitats during sensitive Sage-grouse nesting periods. We Object to the failure of the FS to consider the significant disturbance to GRS and other wildlife

from the roading network, much of it linked to grazing activity and ranchers driving in routes for salt, cow projects, etc. These continued to be expanded in many areas. Notably, even BLM has put in place seasonal spring closures on routes to protect GRSF – but not the SRRD whose OHV routes (and now the EA’s expanded spring grazing⁰) encourage extensive spring human disturbance of Sage-grouse, and now the FS blindly issues this EA with very high amounts of late winter-spring habitat disturbance increasing human disruption, flushing of birds exposing nests, eggs, hens to predator detection and with grazing “management “ activities busting up leks

SRRD Stocking/HM Increase Mysteries --- Across Wilderness and Roadless Lands, Sage-grouse Habitats, LCT Watersheds , Critical Watershed Areas Acquired for Conservation Purposes

Somehow AUMs appeared to have magically increased in some SRRD allotments during the Martin Basin process and that was never explained specifically and systematically by the FS. The Martin Basin EIS was for 8 or so allotments not all the allotments in the SRRD like this current EA is. Now in the 1950s era chaos-based amendment 2 gutting 2022 EA, the SRRD uses a novel category of “maximum” AUMs/HMs to attempt to further increase stocking - and to be determined annually through closed door meetings with permittees to which the public is exclude. We Object to this as there is no substantive current monitoring and hard look analysis under NEPA to support this. It also opens the door for political pressures and potential corruption and permittees aggressively pushing the agency for the “maximum” AUMs each year behind closed doors. There is no systematic stocking of cows based on unit/pasture capacity, no current carrying capacity, capability of land for grazing levels nor of the ability of the land to support viable populations of sensitive and MIS species, and suitability and sustainability analysis, and no hard look assessment at a host of worsened environmental conditions that may result - as we discuss throughout earlier comments, document submissions, and this objection.

Lack of Adequate Mapping Necessary to Understand Ecological conditions, Species Use and Presence, livestock Facilities, Occurrence of Springs, Watersheds, Routes, Cheatgrass, and Many More Issues Across 270,000 Acres – All Essential to Take a Hard Look at Site-Specific Impacts Using Best Available Science

The FS apparently cares so little about that it doesn’t even bother to map flammable annual grass current extent and abundance, or to conduct any honest risk assessment for cheatgrass and medusahead which exists in far greater amounts than the EA Weed report admits. Yes, fires have contributed to these weeds – but the FS has allowed chronic degradation (under LOWER levels of stocking that proposed in the EA Tables were actual use is never revealed) sweeping landscape. This has allowed – and it will worsen – cheatgrass/medusahead/bulbous bluegrass to choke understories of existing sagebrush

communities, heightening fire risk, choking out forbs and destroying “resilience” the ability of native veg to recover from or withstand grazing stresses. We Object to these deficiencies and concerns about adverse weed impacts were found throughout our NOPA and scoping comments.

Williamson et al. 2019 long-term Nevada research on sagebrush demonstrates that grazing causes cheatgrass, including cheatgrass in burned sagebrush communities, and we Object to the extraordinary degree to which the FS has ignored the serious risk of the proposed SRRD actions which intensify cheat/medusahead/bulbous bluegrass domination and spread – and permanent loss of GRSG and other sensitive species habitats and populations, irreparably harming the Owyhee GRSG PMU.

The Williamson et al. 2019/2020 (as summarized on p. 1 abstract) study exposes and affirms how grazing (including following fire) increases fire-causing cheatgrass risk. “Study shows grazing encourages cheatgrass growth”. See Williamson et al. p. 1 Abstract. Also see:

<https://www.boisestate.edu/news/2020/03/13/study-by-matthew-williamson-shows-grazing-encourages-cheatgrass-growth/> .

“A group of scientists led by Matthew Williamson, an assistant professor in Human-Environment Systems at Boise State University, has found that grazing plays a major role in determining the prevalence of cheatgrass; even in places that have not burned. Their results suggest that grazing increases the potential for cheatgrass occurrence by 10-20 percent and that more frequent grazing can almost double cheatgrass prevalence when controlling for variation in climate, topography, fire history and site variation. These results highlight the challenges associated with using grazing as a land management tool for reducing fire and cheatgrass spread”.

The FS also ignores Belsky and Gelbard 2000, and Reisner et al. 2013, Root et al. 2019 and is blind to the role of cattle grazing and trampling impacts to protective microbiotic crusts, a frontline against weed infestation and dominance. We Object to the failure of the FS to conduct a current hard look scientific NEPA analysis and to provide sufficient baseline information so such an analysis can be conducted.

We Object to the continued use of old, woefully out-dated “range” literature akin to the HTNFs past embrace of Dietz “sunshine pamphlet” and “take half, leave half” nonsense that greatly fails to provide necessary protective nesting cover for Sage-grouse and host of other species (Gregg et al 1994, Connelly et al. 2004, Braun 2006 – refers to 7 to 9 inches of residual cover required and the EA provides no residual cover information). The high levels of use fails to protect native understory plants, soils, and crusts. the agency’s willful blindness to current science related to sensitive species habitat conditions, disturbance and other threats, habitat needs in this stressed arid landscape

undergoing climate change, etc. Further, the FS fails to provide monitoring data on the levels of Utilization that it has been monitoring – and the supposed “reductions” in upland standards in some pastures may actually have no meaning on the ground- because of cherry-picked monitoring sites that receive low levels of use. We Object to the lack of a hard look science-based analysis of adverse effects to sensitive species, watersheds and recreational Wilderness and other uses, as the grazing analysis information in this SRRD process, and the failure to prepare an EIS to address serious and significant Sage-grouse, migratory bird, Pygmy Rabbit, LCT watershed condition, water quality and quantity and other elements of species habitat degradation and loss (and highly foreseeable concomitant population declines) from the proposed SRRD grazing and facility actions – is absent from the EA and reports.

Unvetted Claims in NOPA, Scoping Notice and EA Regarding Proposed Action Impacts and Benefits vs. Harms - No Credible Hard Look Under NEPA

We Object that the FS in the SRRD EA makes every effort to wiggle out of its duty to conserve, enhance and restore Sage-grouse habitats and populations for GRSG. The Sage-grouse (and all other sensitive species and migratory bird and other wildlife discussions in the EA) are spun to excuse away very significant scientific information about grazing damage impacts. We Object to the FS grasping at excuses to pepper and fragment the landscape with cow project expansion - further cementing in more harmful spring-killing developments, and also further failing to assess removal of damaging projects and ignoring analysis of facility removal including under the No Grazing alternative and WLD’s submitted alternative. We Object proposing to graze livestock at very high levels of 50% utilization with stocking far exceeding actual use, and the novel “maximum use” category. The old, limited, and scattershot data of the EA downplays adverse impacts of chronic livestock degradation and disturbance effects, seed even more exotic crested wheatgrass.

We Object that the FS has not conducted a current adequate Sage-grouse HAF and viability analysis at all levels and stages based on current site specific and population information. We Object that the SRRD EA forsook that the goal of an effective species conservation plan that must continue to be **conserve, enhance and restore** Sage-grouse habitats and populations. This abandonment of any hard look at what is needed in the SRRD to sustain, protect and maintain viable populations of sensitive species like Sage-grouse or ESA-listed species like LCT and other aquatic biota is made even worse because many crucial habitats are SNPLMA acquisitions. This is paralleled by the requirements of the FS own sensitive species policy and Humboldt Forest Plan MIS species analysis. To achieve this goal, and to ensure the survival of Sage-grouse, will take drastic actions - as the 2015 plans have not proven adequate to prevent further declines BLM has scoped currently preparing new plans. See Attached WLD comments. See Connelly et al. 2019 describing serious sage-grouse declines while agencies are in denial, see BLM new sage-grouse Plan amendment scoping notice, see Remington et al. 2021

and much other current information - all of which makes the effort to increase and intensify grazing here without any credible current sage-grouse analysis even more shocking. We Object to the failure of the EA to take an honest hard look at actions needed to conserve, enhance and restore habitats and populations of Sage-grouse and all other affected sensitive and/or listed species for these cow-battered FS lands. It is necessary to greatly increase management protections and reduce threats and conflicts for all occupied habitats, and to determine actions needed to restore significant acreages. This is certainly the case on FS lands that have are becoming inundated with irreversible weeds – and in the context and setting of large-scale Martin and other fire impacts to leks and nesting/wintering habitats. This is also necessary to prevent further migratory bird habitat destruction and biodiversity loss, and to ascertain the “take” under the Migratory Bird Treaty Act of migratory birds associated with these expanded grazing bouts right on top of critical mating, nesting and young rearing periods, plus the harms from the unassessed battery of existing lethal fences, water developments, and other livestock facilities and management actions. See Rosenberg et al. 2019 describing loss of 3 billion birds from North American and continued avian declines. We Object to all these EA and hard look analysis shortcomings and violations of NFMA for MIS and sensitive species.

The SRRD FS has failed to identify the extent of degradation, and rehab needed on sites infested by exotic species or that lack sagebrush and act to restore these so that existing populations can be expanded. This process greatly fails to systematically assess this threat and develop reasonable and prudent measures to address it. Instead, nearly all elements of the intensified and expanded grazing chaotic disturbance scheme will lead to expansion of waves of flammable invasive species jeopardizing sensitive species habitats and populations and causing great disruption of the ecological balance in Wilderness lands, Roadless areas and across Sage-grouse and other wildlife and rare plant habitats. We Object to these analysis flaws.

The FS violates NFMA and NEPA in not having adequate current site and species data – using stale scattershot decades old info to puff up claims about land health claims and sagebrush presence and canopy cover, and by completely ignoring any actual site-specific assessment of cheatgrass/exotic annuals and being completely blind to assessment, of, and protection of, biocrusts which serve as frontline defense against biotic communities. We Object to this.

We greatly object to the lack of certainty that any of the following claims made in The EA will be realized: The proposed action specifies the required livestock management practices to move rangeland plant communities toward desired conditions. (A list of plant species on the Santa Rosa range and their respective resource value ratings on each ecological site are in appendix 2.) This project proposes to:

- Adjust the current season of use from a fixed grazing season to a flexible grazing season. [This is Grazing Chaos]

- Supply flexibility in the rotation grazing management systems (e.g., deferred-rotation, rest-rotation, or a combination of deferred and rest rotation) to manage livestock distribution. {This already exists as shown by AOIs}.

... within an allotment from year to year. All grazing management systems refer to the recovery of an area post-grazing. [What does this “recovery” mean and how can it be measured with no current pre-decisional baseline – as there is no current adequate baseline established, so there is no way to measure recover??? What is the time period? What are the specific parameters and metrics for soils, soil trampling in upland and riparian areas, microbiotic crusts integrity/composition/cover/type, each native vegetation community, no current adequate lentic/lotic wet and dry meadow assessment – not even current mapping of the area extent of all lentic and lotic area and meadow areas, or of current status of drainage networks – perennial, intermittent, ephemeral and the reaches that have suffered flow loss; what does ‘recovery’ mean for Pygmy Rabbit vs., sage-grouse?]. Forest management goals decide what systems each allotment uses. [Specify all goals for all areas for all allotments at present that will foreseeably be in place following this action. We Object to all these uncertainties and gaps in information and analysis]. annual utilization criteria for herbaceous vegetation in uplands dominated by native species across the 12 allotments are not to exceed 50 percent of current year’s plant growth as measured in key areas. [There is no current systematic data on upland vegetation in each pasture/allotment/across the SRRD, or what species currently “dominate” in understories on the ground – or if there is shrub cover at specific percentages – are we talking shrub vs tree vs. grass vs. annual invasives? We Object to the uncertainty]. Set annual utilization criteria for herbaceous vegetation in uplands seeded with naturalized species at not to exceed 65 percent of current year’s plant growth. [Where are all these sites at present? Which specific pastures would this apply to in each allotment, and how current is the data this is based on? Does the FS include cheat/bulbous bluegrass dominated lands with scattered crested wheat here? What are the specific delineations of these areas and how current is the data? How many of the sites were seeded with these species as “emergency” post-fire measures? Why isn’t the FS acting to restore exotics? What specific seeded species are present in each pasture area, allotment area and across the SSRD? We Object to the lack of certainty].

- Set 4-inch annual average residual (amount of current year’s growth left after the end of the grazing season) stubble height (hereafter referred to as stubble height), specific to grass in all wetlands, riparian areas, green-line areas, and wet meadows. [This, along in the EA Alt. 2 is now proposed as 45% utilization - in this effort to gut amendment 2 – as the SSRD EA will do by divorcing the species occupancy importance and fragile condition of a riparian area from receiving more protective management. This ignores condition, slope, risk of permanent losses of soils, wetted areas, species like LCT from these drainages. Why is this only on “grass” and how is “grass” defined? What about riparian forbs so crucial for GRSG brood rearing? Where specifically will this be measured? How much bare ground will result, and where? This greatly ignores that several “grass” species in grazing-damaged SRRD sites are poor bank stabilizers. Ex: Ky bluegrass, *Agrostis*, etc. This also ignores any measurement of highly damaging cattle trampling impacts. Belsky et al. 1999, also MIM protocols. We Object to the lack of a hard look analysis of all of these factors].

- Set annual utilization criteria for riparian browse (i.e., shrub and tree species) at not to exceed 35 percent of current year's leader growth. [this is an effort to gut Amendment 2 that allows higher degrees of protection for more damaged sites and to protect critical resources].
- Set annual utilization criteria for upland browse (i.e., shrub and tree species) at not to exceed 50 percent of current year's plant growth.
- Set 10-inch stubble height criteria for Great Basin wildrye (*Leymus cinereus*; Ogle et al. 2012).
- Set annual utilization levels for dry meadows at not to exceed 45 percent of current year's growth and keep or trend towards the desired condition.
- • _Authorize structural improvement modifications and maintenance on existing rangeland developments within the project area following forest plan standards and guidelines (Table
- Proposed Rangeland Improvement Projects. [Discussed throughout comments and this objection, and we greatly Object to expanding projects and lack of site specific analysis and failure to reduce projects and minimize and mitigate lethal and injurious facilities to wildlife].
- Amend the forest plan with a project specific forest plan amendment with the elements above that pertain to grazing management in wetlands, riparian areas, and meadows as well as utilization in uplands and of Great Basin wildrye. [Will this apply across the HTNF? Across the HF? And where is analysis of these large-scale changes gutting the flexibility of Amendment 2 We Object to the lack of information and analysis that allow the FS to provide more protective use levels based on the value and condition of riparian and other areas, and that has required in-season triggers for moving livestock so damage can actually be prevented].

The proposed action makes these changes within the existing permit framework. [We Object to the FS never even providing the basic information on the current permits on all allotments – and this is part of the lack of clarity on where in the novel AUM/HM category of increased stocking comes from, and what it is based on].

EA Shows Abject Analysis Disregard for Microbiotic Crusts Protection of Soils and Prevention of Weeds and other Ecological Values

We Object to the profound failure of the EA to address livestock trampling degradation of microbiotic crusts. How does the Forest measure and monitor the health of microbiotic crusts, which provide a protective covering to soils, sequester carbon, provide nutrients, protect watersheds through promoting proper infiltration, and help exclude weeds? Belnap et al. 2000 BLM Tech. Bull. 2000. Microbiotic crusts are a very important component of arid land communities that the project will harm. The crusts in forests and western arid lands stabilize soils, protect them from erosion, and are a frontline defense against cheatgrass and other invasive species. See analysis examples:

Beymer et al 1992. Harmful effects of cattle grazing on microbiotic crusts.

Bowker et al. 2008. Crusts as soil function indicators. Yet the project ignores and sacrifices crusts –exposing sites to even more intensive cow impacts such as weed-causing soil/crust trampling, deposition of weed-causing manure, cows eating fragile native plants reducing woody and other protection for crusts, and facilities concentrating high levels of trampling damage.

Bortherson et al. 1984. This describes adverse effects of long-term grazing on crusts.

Concostrino-Zubiri et al. describe effects of exposure and grazing - example Bryophytes (mosses).

Deines et al. 2007. Lichen cover resulted in a significant decrease in cheatgrass. Crusts are a frontline defense against flammable invasive grasses!

Evans and Belnap 1999. Effects of crust loss on nitrogen fixing in soils in arid communities with crust loss.

Fernandez et al. 2007. Results show that areas used by domestic livestock have 20% less plant cover and 100% less soil organic carbon and nitrogen compared to relict sites browsed by native ungulates. In actively grazed sites, domestic livestock grazing also appears to lead to clustered, rather than random, spatial distribution of soil resources.

Kettering 2009. Soil crusts were not totally recovered after 40 years from disturbance. Crust loss and disturbance also impacts carbon sequestration.

NRCS 2007. This describes microbiotic crusts and disturbance impacts. It's too bad NRCS veg models (such as those used in the Ecosites, disturbance intervals, and other info the FS relies on) ignore the natural occurrence of, and role, of crusts.

Ponzetti and McCune 2007. This describes adverse effects of soil and crust disturbance - such as increased incident radiation, increased heat load, and topographic position in crust recovery.

Root et al. 2019 describes protection of shrubs for crusts including preventing livestock trampling impacts.

Rosentreter et al. Field Guide. Lichens and mosses typical of the region. Which species have been found, and where, in the project area and surroundings? Zero data and analysis in this process.

Serpe et al. 2008. Crusts tend to reduce the spread of invasive species. The project will harm and/or destroy or lead to the cow-caused destruction of crusts – over vast areas, and the Forest ignores this harm.

USDI BLM Belnap et al. 2001. Tech. Ref. on Biological Crusts. Describes grazing and mechanical impacts to crusts, and their vital role in the ecosystem protecting soils from erosion in wind and water and other ecological functions.

The minimal EA and staff reports has failed to provide any information on crusts (presence, abundance, cattle damage to them, consequences of this damage, actions needed to restore crusts, erosional loss due to loss of crusts from cattle trampling, crust loss effects on soil productivity and functional processes, loss of carbon fixing due to cow-caused loss of crusts, etc. We Object to all of these baseline information and hard look NEPA analysis deficiencies regarding key biocrust soil erosion protections and natural weed prevention biotic elements of arid land ecosystems..

Regarding cow-caused soil compaction from livestock grazing trampling: How will compaction be measured, minimized/mitigated, and monitored in the project area, and how do soil type and condition, soil moisture at time of grazing, slope and other factors interact in all portions of the project area and watershed?? Fleischner (1994), Belsky et al. 1999. Facility reconstruction and/or expansion and rampant placement of salt and supplement feeding in fragile sagebrush site alters how livestock use the landscape, and zones of soil disturbance, compaction and damage to microbiotic crusts. We Object to the failure to take a hard look at these significant concerns. We Object to the lack of data on soil erosion rates in wind and water at present, and under the proposed grazing schemes.

Any valid analysis of the capability and suitability of Forest lands to support livestock grazing must consider the need to protect crusts and soils and determine the amount and levels of disturbance/degradation and other factors must also be considered. We Object to the lack of this analysis.

We Object to the abject lack of any look at how increasing cattle numbers, expanding periods of use, expanding facilities, failure to provide any limits on trampling impacts violates NEPA, NFMA, and will lead to further water quality degradation – which the FS has also failed to provide adequate systematic data and analysis for. The flawed management scheme is an attempt to strip and reduce riparian protections and increase grazing damage in uplands – and is another variation the “sunshine pamphlet” series of analyses the HTNF attempted to conduct around 20 years ago.

We Object to the FS failure to take a hard honest science-based site-specific look at ALL of these preceding factors and issues raised by WLD in comments and scientific information submitted to date in this process.

We Object to the failure to prepare an EIS for this huge landscape where increased cattle grazing will determine the weed, desertification, specifies habitat loss and population viability loss fates of a host of threatened species. The chaos-based grazing by alarming numbers of cows over even longer periods of time based on 1950s era “standards”. Promises of future “monitoring” are extremely questionable and unlikely to be even remotely adequate to sustain and conserve crucial values and to detect damage before irreversible degradation takes place. As this Objection discusses throughout, FS has not even bothered to conduct minimal monitoring in LCT streams, has not bothered to conduct the monitoring promised in Martin Basin, appears to be in violation of the ESA by not providing 2022 monitoring required under the Martin Basin EIS, etc. Nearly all of the extremely limited EA data for all aspects of the environment is long since stale and wildly outdated. The FS veg, NFMA report, BE, etc. presents data in tables the agency uses to form conclusions in a way that: does not reveal the date of the specific info used; omits crucial data on key arid lands necessary to honestly evaluate proposed action and alternative elements (cheatgrass, microbiotic crusts, spring flows and adverse effects of the existing welter of incrementally piecemealed in cow facilities every single one of which is to be retained or its damaging footprint often made worse under the EA actions). See Dobkin Declaration , Sada et al. 2001, Sada and Lutz 2016, Belsky and Gelbard 2000, Connelly et al. 2004. There is no assessment of the toll the existing lethal fences and scads of water developments (nearly all of which the EA is dead silent on) are taking on mortality of the local and regional population of Sage-grouse, Pygmy Rabbit, and migratory birds– nor on population status, trends, lek locations, changes in leks over time, where leks have blinked out, changes in all seasonal habitats over time, lek counts for recent decades in association with each lek, population triggers, whether population levels comport with MIS species requirements and sage-grouse specific elements of the Humboldt Forest Plan, and much other essential information including up to the present and following the Martin and other fires. We Object to this and the lack of a valid scientific baseline of livestock facility location and impacts, and adverse direct, in direct, cumulative and additive impacts effects analysis.

We Object to the FS failing to address how very old the baseline for the Forest plan is, and this further demonstrates the need for an EIS for any changes to the Plan and to ensure sustainability of FS land values – for example to take into account climate change stress and substantially alter damaging environmental allocations to address this. Climate change, and the stress that hotter temperatures for a more prolonged period, earlier or more extreme snowmelt runoff and other weather events and effects on forest ecosystems were not considered in the Humboldt Forest plan, and its allocations – as for grazing disturbance -were not made based on the current real world setting. If lands are in poorer condition – or are significantly disturbed by more or intensified grazing - these effects may be even more pronounced and severe. We Object to the failure to consider the existing Forest plan grazing and other allocations that impact (directly, indirectly, cumulatively) - before conducting any new amendment and failure to consider large-scale reductions in harmful allocations such as grazing in light of current climate change stresses. See Beschta et al. 2012 and 2014 for example, Carter et al. 2014.

Lands that are significantly altered or disturbed by livestock grazing are also likely to be less resilient when subjected to grazing, fire, treatments, etc. and are more prone to excessive erosion, less shade which slows down snowmelt, etc. The risk is particularly great because the landscape and the project area receive a large amount of livestock grazing disturbance that alters site conditions and ecological processes at every level. We Object to the failure to take a hard, science-based look at these significant ecological concerns related to the nearly 40 year old Forest Plan and its allocations.

We Object to the FS failing to provide the public with the existing AMPs as part of this process, so the actual grazing schemes can be vetted against meager and unclear info in the EA and various reports.

We Object to the FS failing to provide detailed info and analysis on what is meant by interim use and why use is described as interim currently. Was a backroom deal cut with the permittees in some separate process?

The SRRD incrementally piece-mealed in a host of lethal bird killing, weed causing and cow impact-intensifying fences in uplands and along riparian stringers and as gross stinking vile manure bog water “gaps” to try to continue overstocking over the years. This has fragmented sagebrush habitats for many species. The FS is blind to actually assessing these conditions, the magnitude of the beneficial effects of the No Grazing alternative, and of WLD’s submitted alternative. We Object to this. The entire NEPA analysis and ESA consultation process is based on deception by not providing the public with an honest analysis of amendment 2 (which allows the FS the flexibility to reduce livestock use levels/standards in riparian and upland sites at any time in response to changed ecological values and/or the adverse effects of cow damage that is taking place. in many instances the use levels will actually increase and intensify the allowable level of cow impacts to riparian areas). We Object to the lack of a hard look analysis of these factors under NEPA, and no clear analysis of this under the minimal alternatives. We Object to this.

The SRRD has dumped rocks into dying meadow after dying meadow to claim “restoration”—resulting in increasing permanent desertification and further and expanded loss of meadows. WLD’s site visits have documented the disastrous incremental fencing, rock dumping, and other actions, spring gutting, pond gouging in recent years – and the harmful impacts to soils, biocrusts, watersheds, sensitive species, etc. that have resulted. We Object to any hard look at losses of area extent of perennial flows, meadows, conversion of wet meadows to dry meadows, etc. and how this results in a loss of crucial watershed areas and habitats for rare species.

WLD’s Fite also documented the purposeful destruction of occupied Pygmy Rabbit and Sage-grouse habitat by SRRD sagebrush destruction projects that have taken place here. there is no baseline data and no hard look at the project adverse impacts and no data on current occurrence and site occupancy of Pygmy rabbit in the SRRD and surrounding

lands, including those impacted by the Martin Fire, and we Object to the lack of information on current species occurrence, habitat quality and quantity and fragmentation and loss – because this is necessary to assess the impacts of the grazing scheme and the facility expansion scheme. For example, will new troughs or pipelines or fences destroy occupied pygmy rabbit habitat? There is no site-specific survey information, and no map showing details of each of the battery of expanded projects. See Dobkin and Sauder 2004 describing how animals may no longer be present in areas agency model them to occur. Further, the HTNF has done separate NEPA reviews for individual cow projects – but here all we get is a lost with no integrated site-specific cultural, biological, weed or other inventories pre-decisionally.

There is no qualitative flow data for all developed and undeveloped springs, seeps and many drainages -despite the FS proposal to gut amendment 2 and re-gut numerous springs and expand water-sucking spring flow and punch destroying pipelines into sagebrush uplands where they will facilitate further cattle degradation and destruction of Sage-grouse, Pygmy Rabbit, migratory bird habitats combined with shifting and intensifying cattle degradation, desertification processes and weeds in other neighboring meadow/spring seep/riparian habitats, This all lacks adequate site-specific analysis of each of these expanded and intensified project developments we are also greatly concerned that once these pipelines are re-dug and more water is pirated away from springs that the peoples will be incrementally expanded. There are no site-specific maps detailing pipe length, trough location, and species habitats impacted, current ecological conditions, weed locations, etc. This is all bound to expand extensive new zones of bulbous bluegrass/cheat/medusahead without providing even rudimentary site-specific baseline information. The spring-gutting/re-gutting threatens to dry up springs further – or entirely. See Sada Springs Tech. Bull, 2001 Sada et al. 2016. We object to the FS failing to address all of this uncertainty with a hard look NEPA analysis at adverse impacts, failure to provide mandatory mitigation and monitoring, failure to assess a reasonable range of alternatives (such as placing conservative mandatory measurable use limits combined with grazing a controllable number of livestock or other measures and stocking at levels that permittees can control - with levels determined by consideration of actual use stocking and current inventory-based ecological condition data and analysis to ensure sensitive species needs are met; and also failure to ensure compliance with NFMA, the Forest plan, the Migratory Bird Treaty Act, the NHPA, etc.

There is also the fantasy in the EA Tables and “analysis” of alternatives that the permitted number of AUMs/HMs were able to be grazed in recent decades. There is no review of AOIs over the past 2 decades, and no analysis of actual use data - or it appears no actual effort by the forest to get the permittees to turn in actual use, no review of permittee billing records, etc. Understanding how many cows have caused the current conditions is crucial for understanding if EA actions – and permitted and any novel ‘maximum” AUMs proposed are valid - but this data is lacking. that the public and decisionmakers can understand the consequences of stocking under the proposed levels despite– which are bizarrely identical under both “action” alternatives. Further, there is

NO alternative that analyzes and takes a hard look at the actual on the ground grazing levels and the actual cattle numbers/HMs and stocking that has caused current conditions, the existing grazing schemes and annual riparian and other monitoring data for each unit and allotment and the location and adequacy of monitoring sites, and site condition based on current ecological data and science-based habitat and other inventories and monitoring. We Object to this lack of clarity, invalid NEPA analysis related to cattle use and impacts, and the real world foundation of alternatives. The result is a fantasy-based speculative analysis not based on the reality on the land - blindly rubber-stamped in the flawed FONSI. We Object to the invalid fantasy analysis based on HMs/AUMs that often have not been grazed during recent decades. See examples shown on AOIs below. WLD stresses there has been no accounting for the number of livestock that have caused the current degraded conditions. The bottom line is the two action alternatives only differ as relates to riparian cow use measurements – and all the other harmful elements of the FS – cow project expansion, upland use, expanded grazing periods, grazing chaos-based system – are similar. BLM considers No Grazing as No Action. So we never really get any analysis of the baseline grazing environmental impacts based on current systematically collected data and reasoned analysis. The EA analysis of “no grazing” is laughable and extraordinarily biased - with water quality it is 26 words, and such minimal analysis continues throughout all elements of the environment the minimal and deficient EA. BLM absurdly claims that that re: vegetation alternatives 1 and 2 are the same -ignoring the differences and any actual consideration of environmental impacts to soils, crusts, watersheds, GRSG brood and sage habitats including the significant land areas and habitat areas impacted by cows converging on such areas in this arid landscape. It is impossible to judge intensity of impacts from the fantasy-based alternatives analysis and FONSI. We Object to all of these shortcomings and violations of NEPA’s hard look, use of best available science, reasonable alternatives, examination of context and intensity, examination of cumulative impacts, etc. – as well as compliance with NFMA and other laws and regulations.

This project will inflict great new harm on the Sage-grouse population. The FS’s utterly minimal adverse effects, lack of required specific mitigation measures, and gross failure to conduct a hard look indirect, cumulative effects, cumulative effects area analysis and rampant sacrifice of GRSG habitat values and all other environmental values shows wanton disregard for the bird’s future and violates NFMA and the Forest Plan and sensitive species policies– and flies in the face of common sense.

The fact that the FS completely ignores assessing, measuring, and addressing the very significant ecological value of microbiotic crusts/biocrusts/cryptogamic crusts, including in sage-grouse focal habitat, and instead reverts to highly uncertain 1950s era “range management” paradigms.

Flawed EA Suitability/Capability Analysis Based on Limited Site-specific Information and Ignoring Current Threats to values and Species of High Concern

The scoping cover letter of DR Garotto suitability. The Plan was developed over 35 years ago- and a current look at what should be suitable for grazing under climate stress, mega-drought, the science of grazing-caused flammable annual grasses (see Belsky and Gelbard 2000, Reisner et al. 2013, Williamson et al. 2019/2020 p.) must be undertaken. Plus the FS just carries forward capability and suitability info from circa 2007 with the old Martin Basin EIS – ignoring the current threats to Sage-grouse, migratory birds, other sensitive species, Wilderness, significantly damaged lands from continued grazing disturbance impacts – especially under the relentlessly warming temperatures and weather extremes of climate change. We Object to the lack of current analyses that examines loss of perennial forage and expansion of poor soil stabilizing and wildly erratic “forage” production of cheat/medusahead.

The March 9 2020 Capability assessment of DR Garotto claims nothing has changed since 2007. There have been immense changes – many more fires, the major Martin Fire – 450,000 acres that exploded in lands agencies had allowed to become infested with cheatgrass – and this fire representing colossal GRSG and migratory songbird sensitive species and other sage-dependent wildlife sagebrush habitat loss; the GRSG RMP amendments - which have not been effective in controlling Sage-grouse populations continuing to decline – see 2022 State of the birds Report; FS destruction of pygmy Rabbit. GRSG and migratory bird species habitats with ‘treatments’ including in the SRRD; ever-increasing scientific information on the importance of biocrusts as a frontline defense against weeds; irrefutable evidence of climate change stresses making lands LESS resistant to weeds and LESS resilient in the face of livestock grazing disturbance. We object to the FS trying to side by with a woefully out-dated analysis that does not reflect current conditions and declining LCT and Sage-grouse and other sensitive species populations.

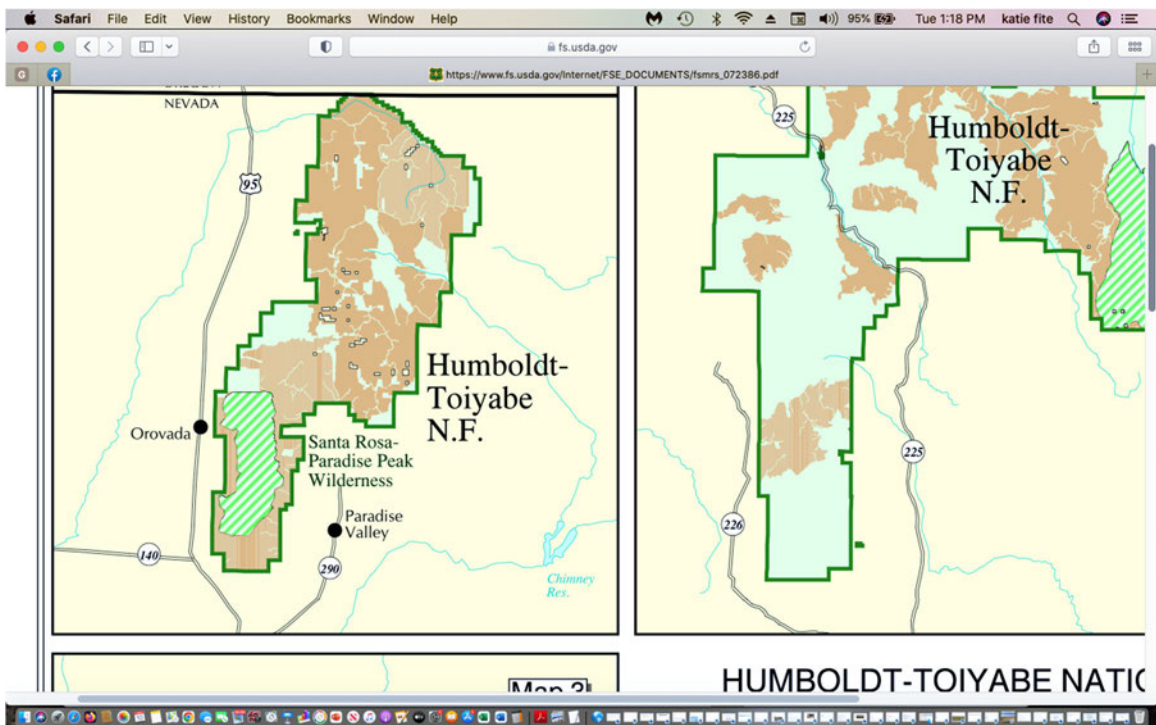
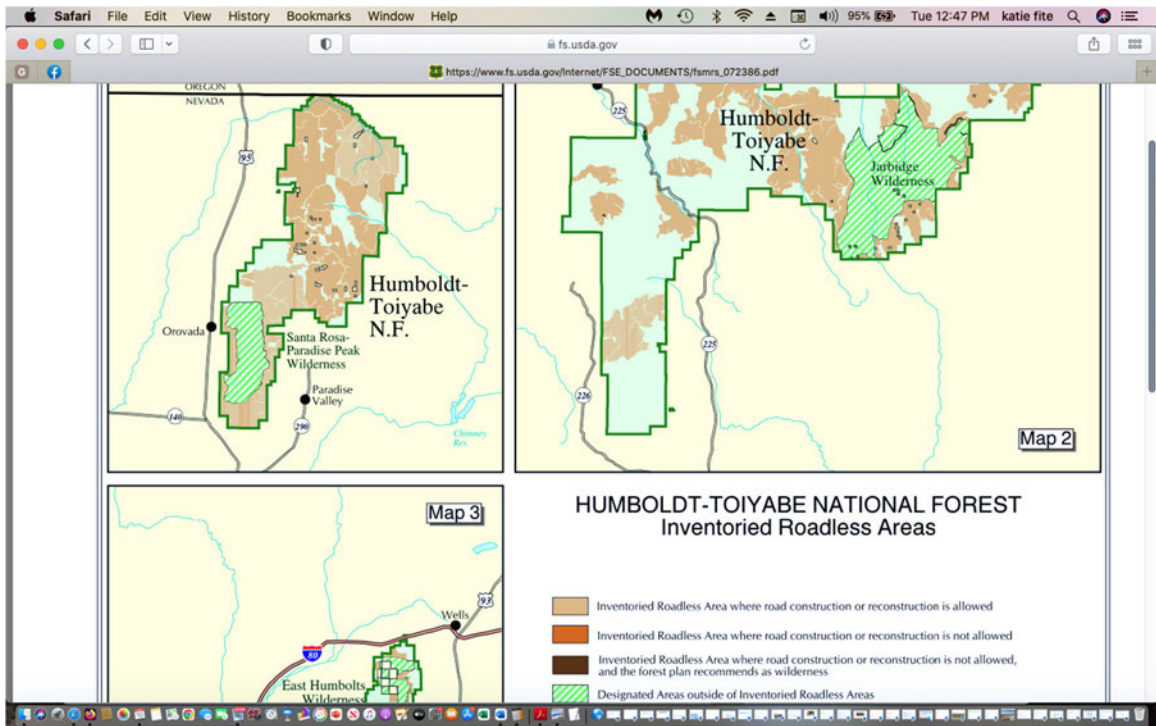
The EA Clark reports states: “Rangeland capability was mapped for the Humboldt-Toiyabe National Forest as a part of the MIS species review project in June and July of 2007”. Since that time 18 years ago, there is much more weed domination of sites, including by medusahead, which is nearly inedible by cows, higher summer temperatures with climate change mean more evaporation loss of waters, more stress on LCT and other aquatic biota, cows drinking more water, less precipitation falling as snow and slowly replenishing the aquifer in melting slowly, more violent weather extremes, etc. Plus --- there was no soil map for 80% of the land when the capability assessment was done., and when many of the ancient monitoring sites used to claim conditions are better than they actually are – were conducted. There were 10,000s acres less cheatgrass and no medusahead, there were not 17 intervening years of soil erosion, climate change stress with ever-hotter temperatures further desiccating watersheds and any semblance of sustainability of continued cattle grazing on these fragile lands, watersheds and tiny riparian areas – etc. the FS in the SRRD EA and its 1950s era management style epitomizes the Agency Denial about the actual current state of affairs of Sage-grouse populations, as described in Connelly et al. 2019.

There are no current systematic production studies – but cheatgrass has increasingly dominated HUGE areas, as shown in the FS NFMA compliance document – with vast areas being invaded and/or having become dominated by flammable annual invasives overrun since 2007: “The data sources recommended by the desk guide are not available for the Humboldt-Toiyabe. The forest used its existing vegetation database, linked it to a table to interpret potential plant community and production. Production [is this perennial production??] was only rated “less than 50#/ac’, 50-200#/ac, and ‘over 200#/ac’ for each vegetation type. The 50 lb. value was used for at least some areas of the Humboldt and Toiyabe National Forests in their 1986 plans”. Thus there is no clarity on what these values are. We Object to all these deficiencies.

As we discuss throughout, the FS relies on ancient history data in its “vegetation database” and has steadfastly refused to collect current systematic sufficient data for a valid analysis. We Object to all of these shortcomings related to Capability and Suitability. An analysis of these factors simply cannot be identical 15 years later. Further capability for MIS and sensitive species – sage-grouse are declining at the rate of 1.5% per year on the average – and higher in many areas.

How many areas have minimal perennial cover, and now are overrun by annual cover which the FS cannot use in its flawed capability analyses???

Also: the FS ignores the necessary process for estimating private land AUMs in areas where lands are not fenced separately private lands, for areas of drainage networks. The FS states “*the desk guide process buffers small streams and subtracts them and water bodies from the land base. This is an unnecessary ...*”. The FS ignores footprints of roads – in this often very heavily roaded forest where ranchers drive routes into every ridge line and accessible drainage area (including making new intrusions expanding routes in IRAs) for salt and facilities. Every pipeline and water trough spurs new roading. The FS has incrementally allowed and overlooked grazing-related roadless area violations, including even in authorizing the very poor travel plan that kept nearly every existing route wide open – and many areas this has led to further expansion as two tracks get driven in deeper and deep rot roadless lands. There is no current mapping and assessment of the actual conditions of roadless areas and changes since any previous analysis, road network on the ground, and the category/type of roading, Roads adversely impact watersheds, deliver sediment into streams, function as weed corridors, provide livestock =easier access to remote, rugged and/or steep areas. Livestock are often herded along routes – interacting cumulatively and synergistically in increasing weed speed transport onto and from road verges. The EA greatly lacks any effective and certain controls on livestock-caused weed infestation and spread in roadless areas.



This whole situation – of cows continuing to be grazed on top of -or herded through- medusahead and other weed infestations is on vivid display along main Forest Access

routes (Fite, field obs.) and spreading onto minor two tracks that are ever-expanding in this landscape. All the herbicide in the world (note the HTNF has no current valid herbicide and invasive species NEPA documentation) will not “control” weeds in situations that suffer chronic grazing and herding through and on top of weed infestations of medusahead and cheatgrass as is sadly now the case in several SRRD areas and allotments. The situation in the SRRD is particularly alarming, since the FS uses such ancient vegetation and other information and pretends it represents current 2022 conditions. Any credible current analysis of grazing effects to SRRD watersheds must be based on systematically collected current cheatgrass and weed infestations. What pastures are infested in what allotments, and to what degree? Which pastures need to be closed to prevent cattle-caused weed spread? What pastures and allotments are at high risk of flammable or other weed domination? How much perennial plant productivity has been lost due to annual weed infestations? How have annual weed infestations affected soil erosion rates in watersheds, including actual restoration actions to prevent further infestation and effectively control and limit weed spread and dominance. This hard look is also necessary to establish a baseline of current Wilderness Area and IRA weed infestation and dominance, and detailed analysis and sampling must serve as the basis for developing a suitable range of alternatives. We Object to the FS EA’s lack of any substantial analysis and the EA’s great lack of a current hard look NEPA analysis and NFMA violations as discussed in the preceding.

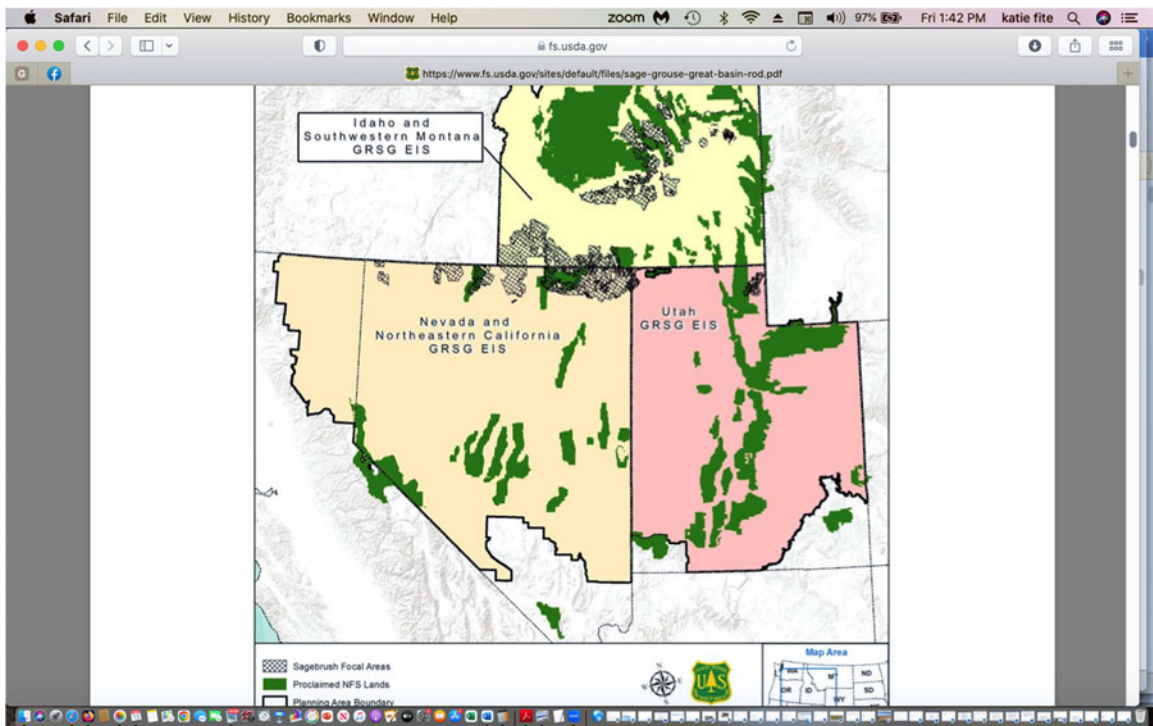
Additional Sage-grouse EA Impacts Analysis Flaws and Information Voids

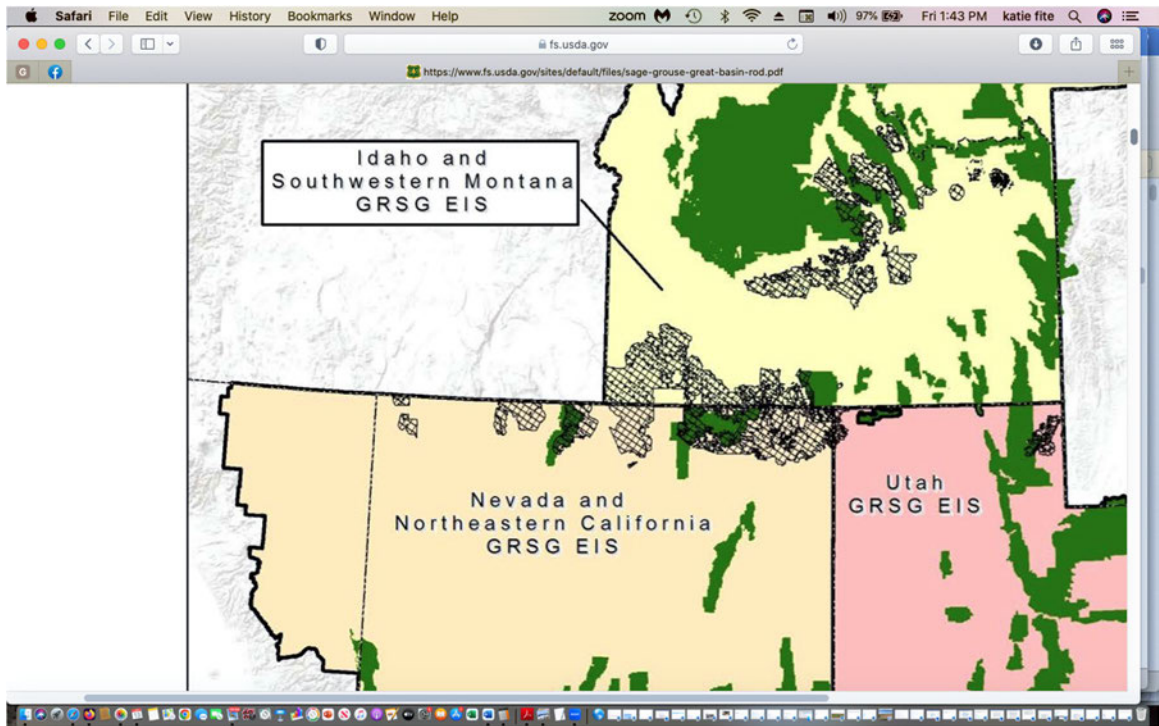
The FS violates NEPA, NFMA and its own MIS and sensitive species policies in the project’s deficient analysis regarding: Sage-grouse and other MIS, capability, population viability, and sensitive species analyses, shallow and self-serving specialist reports, and lack of critical current ecological science and concern about species habitats conditions and trends, and populations level and loss of viability. specialist has not 2015 Sage-grouse habitat category maps. Given the large areas of non-habitat in the salt desert shrub and/or cheatgrass lands West and south of the Santa Rosa Range crest - and the increasing habitat gap opening up with the post-2015 Martin Fire to the east. There is current exploration proposed in the SRRD lands and the next Sage-grouse population to the West is gravely threatened by Lithium mining and exploration (Little Willow Sage-grouse PMU) drawing a bead on the sagebrush habitats/population west of McDermitt in both NV and OR (see attached Thacker Pass proposed mine and McDermitt caldera information including the area targeted by McDermitt Creek and Jindalee that is absolutely crucial Sage-grouse habitat). The Thacker Pass and McDermitt creek areas of the adjacent Sage-grouse population too suffers from sagebrush loss and cheatgrass legacy of the Holloway and Long Draw fires in NV and OR west of Highway 95 - the Forest Service SRRD sagebrush and meadow/seep/spring habitats - which the Forest also often treats as sacrifice zones to livestock in this latest SRRD scheme by gutting higher and flexible levels of protection under amendment 2 and as shown on many current AOIs - become even more crucial to protect in the face off these existing and expanding threats to habitat integrity and condition and to population viability. And with each passing year

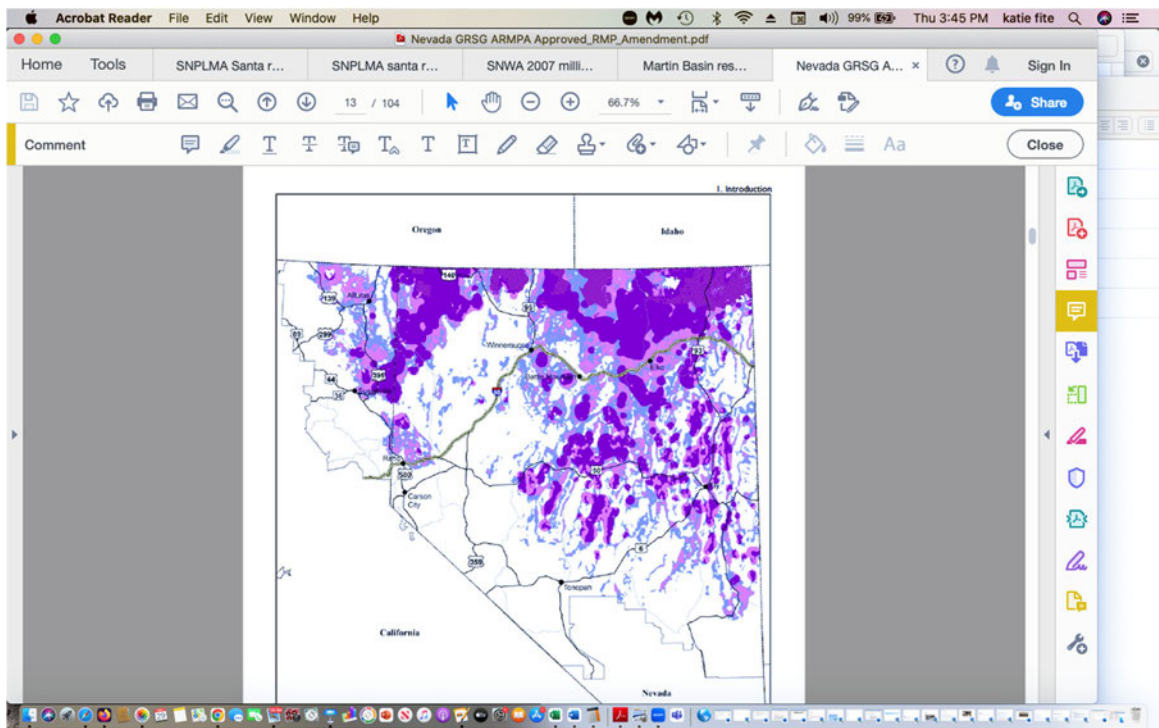
it is even more critical to keep from being overrun by cheatgrass and/or trampled to dried out oblivion. We Object to the absence of a rigorous NEPA hard look analysis, and violations of the Forest Plan and NFMA. It is a great tragedy that the FS fails to provide adequate current data and analysis to protect these irreplaceable Sage-grouse and other species habitats, as shown in Nevada BLM and area-wide Forest Service Sage-grouse Plan documents.

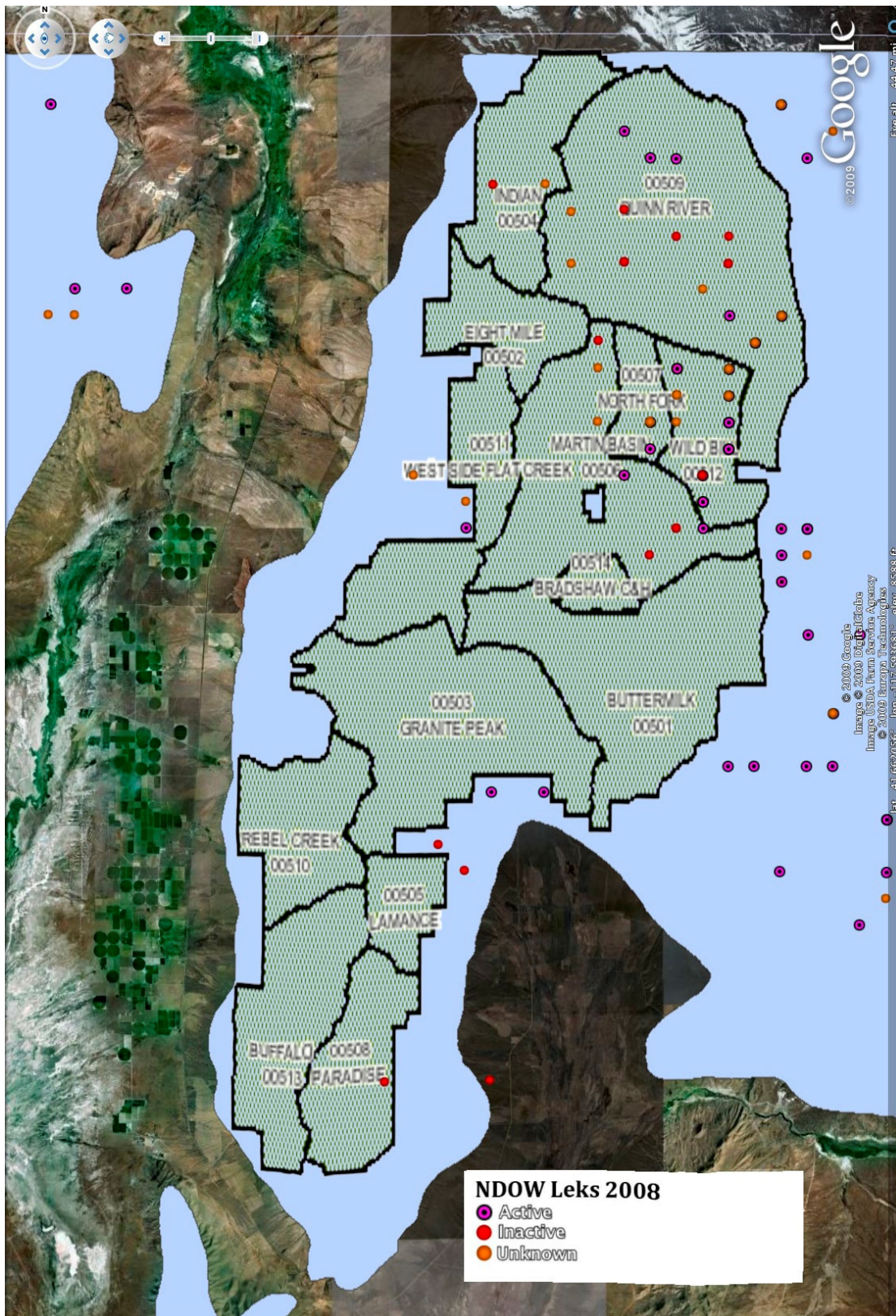
The FS GRSG EIS is at: <https://www.fs.usda.gov/sites/default/files/sage-grouse-great-basin-rod.pdf>

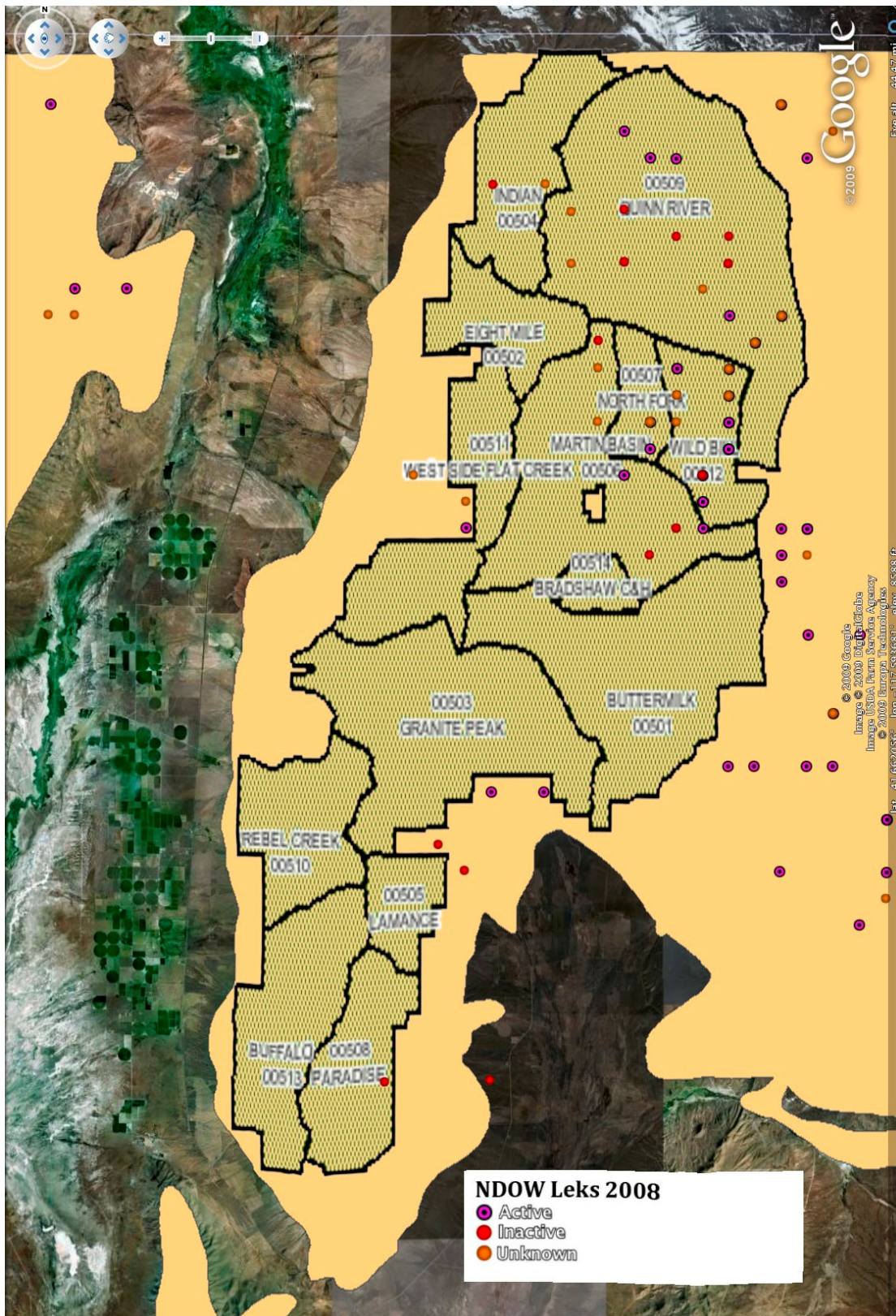
The mapping, though very hard to clearly see -shows nearly all SRRD lands in the east side of the Santa Rosa range crest are sage-grouse focal habitat on the mapping - see dark cross-hatching under dark green – it's almost as if the FS didn't want the public to see the focal habitat areas.

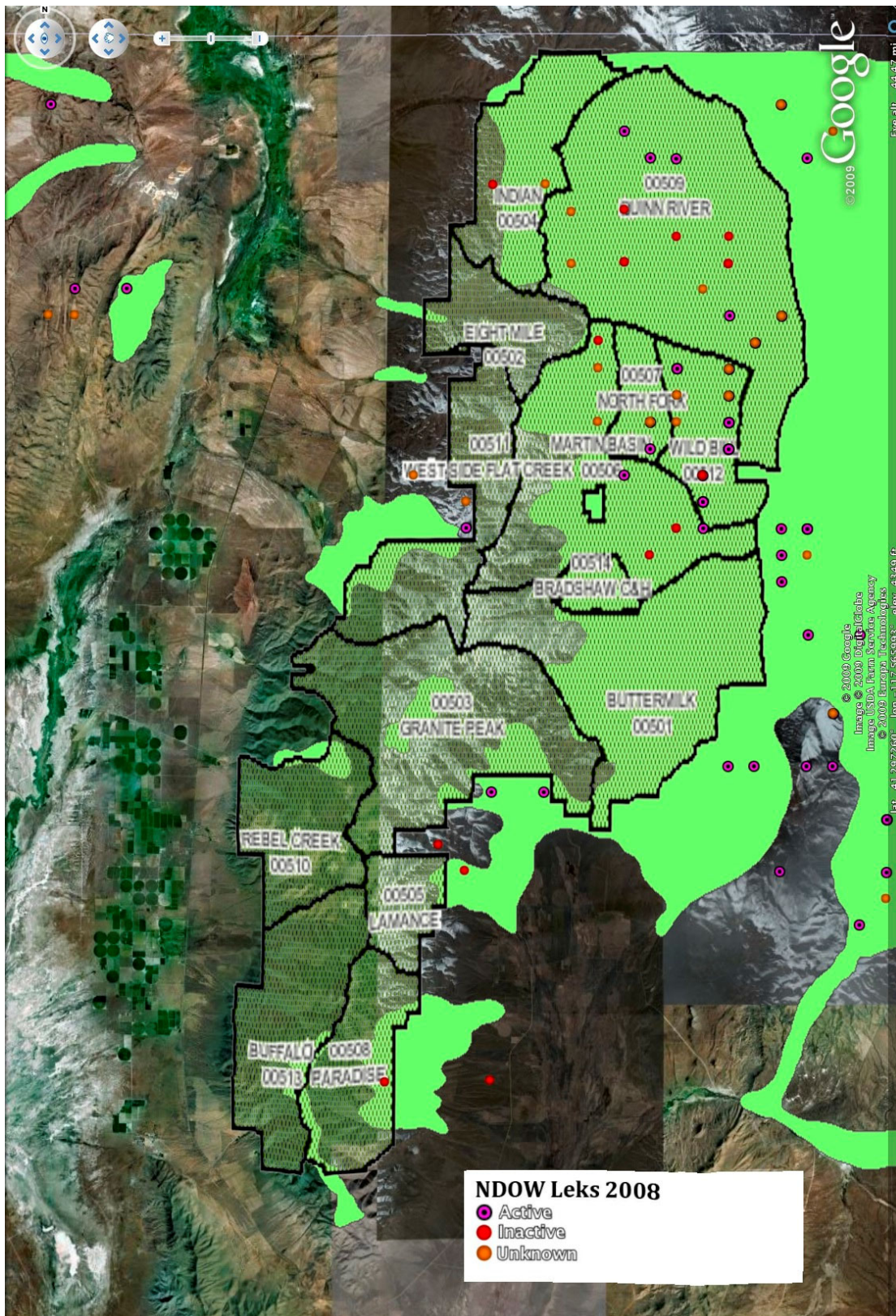


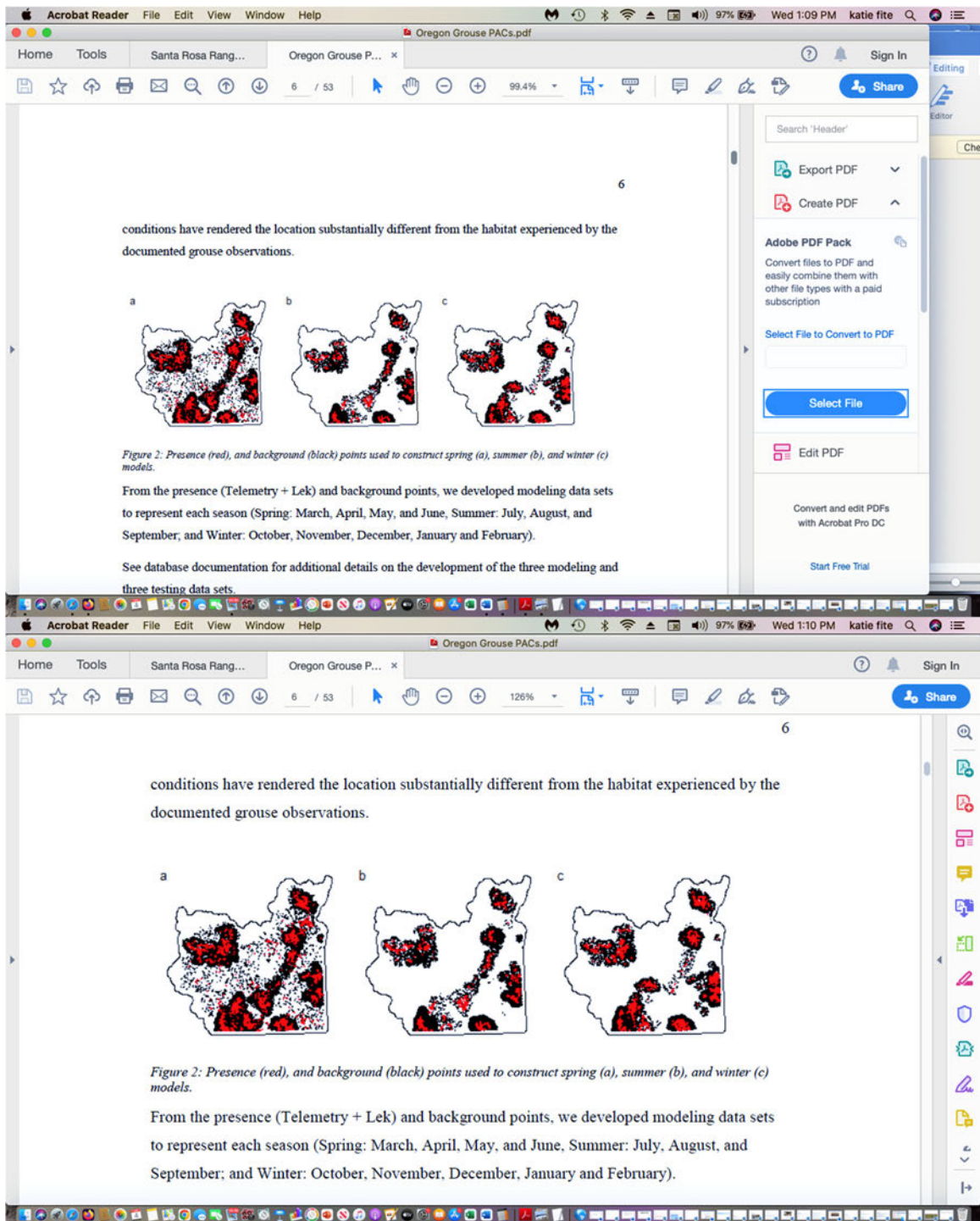


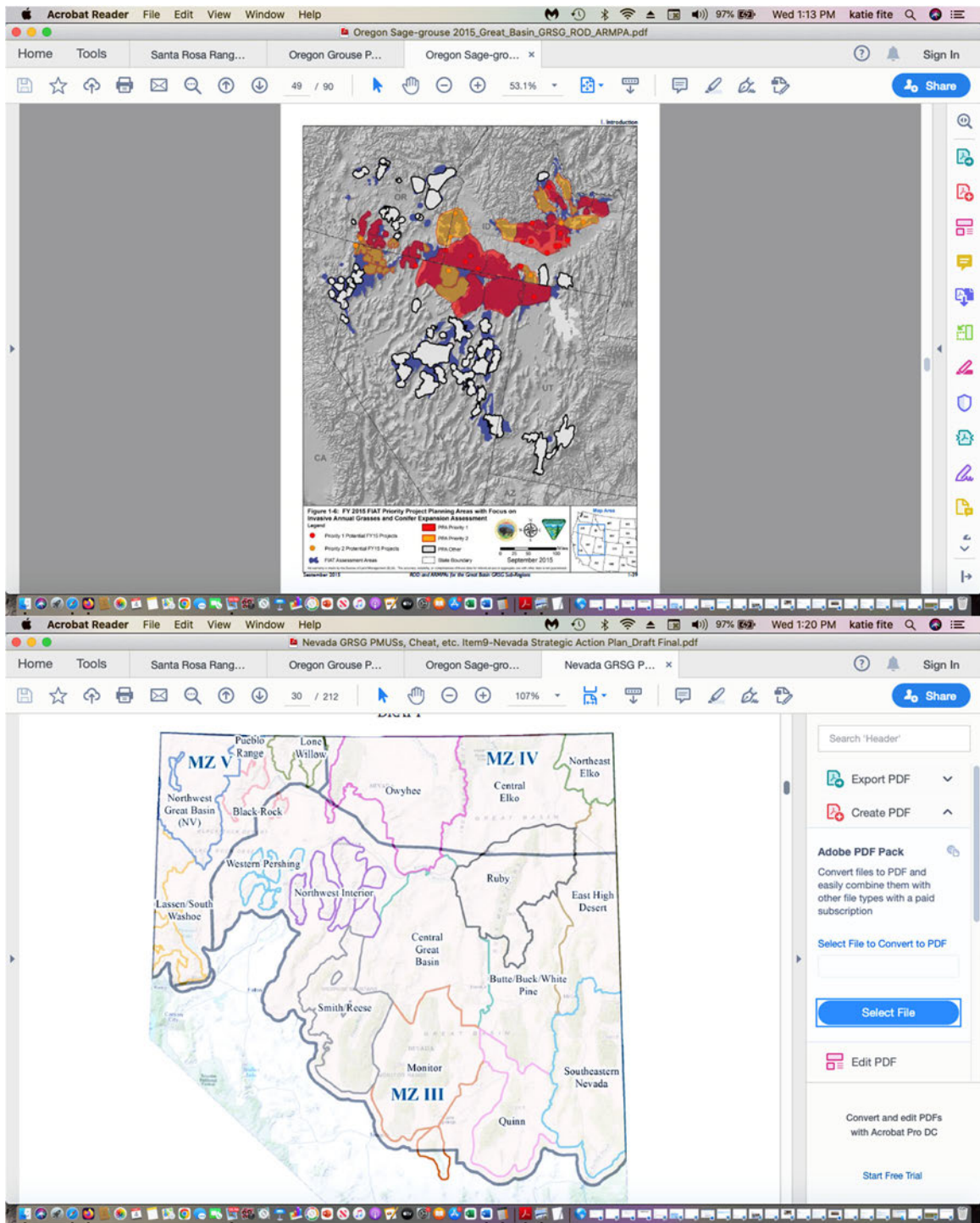












The Owyhee Sage-grouse BSU as described in the NV 2016 grouse plan: “The Owyhee BSU encompasses approximately 3,582,771 acres in Lander, Humboldt, Elko and Eureka Counties and it is within MLRA 24(Humboldt Area) and MLRA 25 (Owyhee High

Plateau). The Owyhee BSU is within WAFWA Management Zones III and IV, and includes the Desert, Tuscarora, Santa Rosa and Eden Valley PMUs. Management of public lands is administered by the Elko and Winnemucca BLM Districts and the Humboldt Toiyabe National Forest. Interstate 80 forms a portion of the southern boundary”. We Object to the FS failure to provide a current hard look analysis at the current status of local and regional GRSG populations and habitats, and the degree and severity of losses and threats to this population, and the lack of a current valid HAF analysis for the EA and other violations of the Forest Plan MIS and sensitive species requirements and the Sage-grouse Plan amendments.

The 2022 Wildlife BE states:

The Humboldt Forest Plan states the following in regards to wildlife:

Goal #14: Improve the current productive level of wildlife habitat with emphasis on maintaining or improving limiting factors such as big game winter ranges, in cooperation with the Nevada Department of Wildlife.

Goal #15: “Manage classified species, such as bald eagle (E), peregrine falcon (E), Lahontan cutthroat trout (T), Bonneville cutthroat trout (S) habitat, to maintain or enhance their status through coordination with other land use programs, agency cooperation, and direct habitat improvements. (Note: E = endangered, T = threatened, S = Sensitive).”

The Humboldt Forest Plan provides specific standards and guidelines to manage wildlife habitat (USDAFS 1986, p. IV-29-48). The 2015 sage-grouse plan amendment will be addressed later in this document.

The Forest plan specifically states that we should:

- Provide habitat for sensitive and federally listed species.
- Protect and improve key or important habitats.
- Protect complexes comprised of moist habitats and adjacent security areas.
- Protect key sage grouse breeding complexes; i.e. strutting grounds and associated nesting areas.
- Improve or maintain the quantity and quality of terrestrial and riparian habitats.
- Protect or improve riparian dependent resources.

We Object to the SRRD EA failing to provide a hard look high quality scientific analysis of all these preceding essential management requirements. This reflects the EA ignoring and/or violating all of these very important Forest Plan elements and mandates.

The FS now is stating: “Historically, forest-authorized grazing uses a fixed grazing schedule with specific on and off dates (April through August). [Why is this historically – as the AOIs show on-off dates up to the present]. This action proposes a flexible schedule that allows grazing outside of the historic timeframes, but with limits

And: The district ranger may allow additional head months up to the maximum head months shown in Table 4 when annual indicators demonstrate that there is ample forage

to support the additional grazing.

The purpose of the amendment is to exempt this project from the Humboldt National Forest Land and Resource Management Plan Amendment 2 utilization standards in the following ways:

- • _Adopt a 50 percent maximum allowable utilization rate in native upland plant communities instead of the variable utilization rates depending on the management (grazing) system dictated by Amendment 2.
- • _Adopt a 65 percent maximum allowable utilization rate in upland communities seeded with naturalized plant species instead of the variable utilization rates depending on the management (grazing) system dictated by Amendment 2.
- • _Adopt an average 4-inch residual stubble height for herbaceous species in wetland, riparian areas, and meadows as an end of grazing season measure instead of the variable utilization rates tied to grazing management system and the five riparian area management categories defined in Amendment 2. [Note this has been changed to 45% in the EA, but the staff reports do not reflect this and there was no draft EA].
- • _Adopt an average 10-inch stubble height for Great Basin wildrye as an end of grazing season measure instead of the variable utilization rates based on the management (grazing) system or riparian area category as defined in Amendment 2.

These amount to very significant changes in this environmental context where crucial LCT habitat, Wilderness, Sage-grouse Focal and Priority and other habitats are at stake, and the FONSI violates NEPA. We Object to the superficial analysis that dishonestly claims no significant impacts and avoids a clearly necessary EIS analysis.

We Object to the EA BE “species considered and effects determination” (starting at BE p. 25) shown in the following EA screenshots. The FS EA and BA and BEW and other reports greatly minimize adverse projects effects and the many ways the EA actions and such high and uncertain use harms and is threat to all species considered, and the conclusions of “impacts” under the categories below are not supported by current ecological science on the threats such as weeds, climate change, hotter temperatures = quicker water evaporation and loss, flammable weed infestation, etc.) the SRRD species face.

NI- “No Impact”

BI- “Beneficial Impact”

MINT- “May impact individuals but is not likely to cause a trend to federal listing or loss of viability”

MILT- “May impact individuals and likely to result in a trend to federal listing or loss of viability”

Migratory Birds and Mule Deer: DT- Actions contribute to declining trend UT- Actions contribute to upward trend; ST- Actions contribute to stable trend.

Regional Forester Sensitive Species- Terrestrial Wildlife (USDAFS 2013)					
Bald Eagle	<i>Haliaeetus leucocephalus</i>	RFSS, G5, S1B, S3N	N	N	NI
Bighorn Sheep	<i>Ovis canadensis</i>	RFSS, G4T4	C	Y	MINT
Flammulated owl	<i>Psiloscops flammeolus</i>	RFSS, G4, S4B	C	Y	MINT
Great gray owl	<i>Stix nebulosa</i>	RFSS, G5	N	N	NI
Greater sage-grouse	<i>Centrocercus urophasianus</i>	RFSS, MIS, G4, S3S4	C	Y	MINT
Mountain quail	<i>Oreortyx pictus</i>	RFSS, G5, S3	M	Y	NI
Northern goshawk	<i>Accipiter gentilis</i>	RFSS, MIS, G5, S2	C	Y	MINT
Peregrine falcon	<i>Falco peregrinus anatum</i>	RFSS, G4T4, S2	N	N	NI
Pygmy rabbit	<i>Brachylagus idahoensis</i>	RFSS, G4, S3	C	Y	MINT
Columbian sharp-tailed grouse	<i>Tympanuchus phasianellus</i>	G5, S1	N	N	NI
Spotted bat	<i>Euderma maculatum</i>	RFSS, G4, S2	M	Y	NI
Three-toed woodpecker	<i>Picoides tridactylus dorsalis</i>	RFSS, G5, S2	N	N	NI
	<i>Corynorhinus</i>	RFSS, G4T4			

woodpecker	dorsalis	S2	N	N	NI
Townsend's big-eared bat	<i>Corynorhinus townsendii pallescens</i>	RFSS, G4T4, S4	C	Y	MINT

Page 25 of 63

Common Name	Scientific Name	Status*	Likelihood of occurrence**	Habitat Y/N	Determination of Effects*** Proposed Action and Alt 1
*Status: Forest Service Status: RFSS- Regional Forester Sensitive Species; MIS-Management Indicator Species Federal Status: FT- Threatened; FE- Endangered; FP- Proposed; FC- Candidate; FEXPN- Experimental-Nonessential NatureServe Element Rank: G- Global, T- Intraspecific Taxon; S- State 1- Critically imperiled 2- Imperiled 3- Vulnerable to extirpation or extinction 4- Apparently secure 5- Demonstrably widespread, abundant G- Questionable taxonomy; ?- Inexact rank; B- Breeding; N- Non-breeding; NA- Not Applicable- not appropriate for conservation					

The FS simply can't make these determinations until it conducts credible current analysis based on current data, systematic site inventories, and scientific studies.

There is no adequate current environmental baseline and/or alternatives analysis to base the FS efforts to determine effects on these imperiled species, on vital habitat for migratory birds, on wintering big game and so many other species so the environmental context is full of risk and uncertainty— despite the fact that the minimal EA would: gut amendment 2 and the amendments’ flexibility to enhance protections under degradation and as species face new habitat and/or population crises; inflict chaos-based grazing with no clear grazing plans so that it will be impossible to understand the magnitude and intensity of impacts; strip higher levels of protection from many areas that currently have more conservative use standards; allow increased numbers of ever-heavier cows/HMs to be grazed including during the EA’s damaging expanded use periods or on top of spawning times, crucial reproductive and nesting periods, brood rearing areas, hot seasons, etc; expand the time period 2 months or more in late-winter spring and 1 or 2 months in fall when the area’s tiny seeps, springs and streams will have minimal flows or may have dried up altogether thus further concentrating livestock use at high levels in remanent areas that still have water flows and at a time when regrowth in fall will not take place so any exceedance will leave lands highly vulnerable to scouring runoff erosion and further loss of wetted areas and perennial flow areas; expand the detrimental impacts of cow water developments and pipelines into fragile sagebrush uplands; expand lethal and injurious weed-causing and predation – elevation fencing while at the same time failing to assess and take a hard look at the colossal detrimental impacts to species, watersheds, cultural sites, and recreational uses of hundreds of other existing livestock projects allow an unlimited amount of salt/supplement feeding causing immediate loss of sagebrush cover and sites for cheat/medusahead infestation in fragile sagebrush habitats often causing irreversible weed infestation and spread plus habitat fragmentation; and numerous other expanded direct, indirect, cumulative, additive, synergistic and adverse impacts to these imperiled species. This will cause a loss of habitat capability for the species, a loss of sustainability of Forest resources, and violations of the forest Plan, NFMA, sensitive species policy the migratory Bird treaty Act, BGEPA (expands habitat alteration and disturbance in Golden Eagle nesting habitats and will cause loss an degradation of prey habitat through depletion and expanding irreversible flammable weeds; and the NHPA by allowing expanded and increased chaotic grazing with increased number of cows trampling and churning soils causing ideal conditions for weed seed spread and infestation – with no trampling standards whatsoever across fragile sagebrush upland and microbiotic crusts (frontline defense against weeds in sage habitats), and also many other species habitat conflicts as we discuss throughout. See Belksy and Gelbard 2000 re the huge role of livestock in weed spread an causing weeds, Reisner et al. 2013, Williamson et al. 2019, Chuong et al. 2025 describing livestock transporting medusahead in mud on hoofs. And all of the EA’s chaotic and increased mud season grazing in late winter-spring would be imposed without any current inventories for these species, and no current systematic district-wide inventories to determine the actual presence of rare plant species. Thus, the environmental “context” is one big blank slate. Further, the SRRD has long aggressively downplayed the importance of the sagebrush habitats and sagebrush wildlife here, and time after time in project after project, sacrificed it for the benefit of a tiny hand full of permittees and their overstocked

herds. Of course, it is impossible to understand just how overstocked they currently are and will be – as no actual use information and analysis and no analysis based on monitoring in relation to use and use levels has been conducted to determine the CURRENT ecological conditions and the role of FS livestock grazing management and schemes in causing them is provided. This is necessary so the FS and public can understand what HM level of grazing caused the current levels of degradation. The context is riddled with uncertainty and gaping species and veg and watershed and water flow and a host of other data gaps – thus, no FONSI can be prepared or signed, and no impacts determinations can validly be made. The FS must withdraw this EA mishmash of minimal and old data based on gutting amendment 2 and a 1950s era management mindset, and must conduct an EIS-level analysis that actually complies with the NEPA NFMA and other environmental laws, as well as treats these species habitats. We Object that there is not a hard science-based look taken under NEPA at any of the above very significant ecological concerns. Under these circumstances, it seems impossible for the FS to adopt any alternative other than No Grazing/No Action, and we object to the proposed adoption of one of the very limited range of grazing alternatives.

We Object that the FS has not revealed the tremendous uncertainty related to the number of livestock that have been grazed under Actual use and has not taken a hard look at its woefully deficient monitoring efforts and the broken management requirements and promises made to the public in the Martin basin EIS process. when WLD conducted a FOIA for actual use , we often found numbers below those permitted - for the few years when the FS had information. It appears that the permittees are so much in control in the SRRD that the FS has not even bothered to require them to annually submit actual use reports in the great majority of instances. The FS never conducted the monitoring required under the Martin Basin EIS. It never collected systematic current data on aquatic and terrestrial communities and biota to base this 2022 EA on, and instead relied on often very old and scattershot bits of data. Under such circumstances how in the world can the FS expect the public to believe it will credibly and honestly conduct the various monitoring claimed in the EA to support this chaos-based grazing scheme – especially given that the agency has so little current data that it has had to rely on 1979, 1990s and other ancient data in deriving current the data used in the Veg and soils report, its so-called Sage-grouse analysis, its NFMA assessment, and the whole greatly inadequate EA process. This also means the FS has no idea the number of cows that caused current conditions. It has not basis whatsoever for understanding how the proposed stocking rates of the EA under the grazing alternatives can be supported.

We Object that the FS has no current adequate basis whatsoever for stocking the Quinn allotment (or any others). The EA states:

In general, the majority of the allotment (uplands) is not meeting DCs due to repeated catastrophic fires over the past 30 years, encroachment of cheatgrass, medusahead, and other noxious weeds, and unauthorized livestock grazing. The riparian areas have shown some indications of improvement although most are still not meeting DCs. It is anticipated

that as the Forest gains control over the unauthorized livestock there will be continued improvement towards DCs.

There is no certainty of improvement, and not baseline for understanding how bad conditions are, and whether attainment of “DC” will even be possible. For example, the Quinn allotment was NOT part of the Martin Basin EIS, so no data on “DCs” was collected then, and there is hardly any data in the EA for this large and critically important damaged GRSG, LCT, Pygmy Rabbit, migratory bird Quinn allotment habitat. Further, horse use is largely limited to northern areas, and there has been no effort to separate and monitor differing uses in this minimal self-serving EA. Yet, the FS proposes the novel “maximum head months” and significantly INCREASED grazing use - apparently drawing cattle stocking numbers out of thin air. We Object to these large and pervasive EA analysis deficiencies.

We Object that the FS: Fails to assess the effectiveness of the proposed excessive end of season utilization, lack of bank trampling standards, etc. in preventing further degradation and irreparable harm and loss to degraded sites and fails to specify within-season utilization triggers and these are not presented with mandatory “shall” wording, and fails to address changes actually made in all allotments since adoption of the MB FEIS. The EPA’s comments on the Martin Basin FEIS specified the need for bank trampling standards of 10% to protect water quality. WLD also believes they help protect water quantity and reduce permanent perennial flow losses in cow-damaged watersheds. See EPA letter on Martin Basin FEIS:

<https://archive.epa.gov/region9/nepa/web/pdf/martinbasinrangelandfeis.pdf> .

In the Martin Basin process, utilization was assigned to “functional classes”. It relied on monitoring of utilization to set and make adjustments. Where is that monitoring data for the period since adoption of the EIS? We Object to the glaring lack of EA data and information related to the monitoring aftermath outcome of the Martin Basin EIS for the 8 affected allotments - as it is absent and/or unclear in the EA and associated reports.

There was also to be early livestock removal from pastures or allotments if PUC exceeded. We Object to the failure of the FS to provide data and analysis of where and how this was done, and what impacts were to sensitive species and other values, and the EA would gut that protection of Amendment 2. Note the MB EIS kept that amendment in place, but the FS never conducted its promised follow up monitoring actions nor did it ensure compliance with standards – as NDOW reports of cattle impacts and WLD’s own site visits found.

The Martin Basin EIS (and the same capability/suitability scheme as the 2022 EA uses) admitted it was unclear how initial permitted numbers will be impacted in order to get reduced utilization levels. Here in the SRRD 2022 document, it remains unclear just what the stocking rate was before the MB EIS, after the MB EIS and piecemeal wilderness EA, what actually the existing permits contain, and what AOIs have been based on and what

they contain and how they may have changed over the years for all existing permits. Where the extra novel “maximum” HMs/AUMs shown under the grazing alternatives come from? What specific AUM levels correspond to each of the “action” alternatives, as well as what have actual use levels have been over the past 2 decades and up to the present? What weight of cattle grazing capacity analyses (if any actually exist) is stocking and the novel HM category based on? Throughout the earlier Martin Basin effort – actual use was ignored, and this flagrantly continues in 2022. We Object to the large-scale dearth of stocking information, the FS rewarding permittees for not even submitting basic paperwork, and the FS EA’s abject lack of current systematic hard look analysis and information.

With Martin Basin, “EPA commented “clarify in FEIS whether or not availability of additional lands from private purchases, and also clarify use of Rebel Creek and Bradshaw vacant allotments in Martin Basin”. EPA recommended removal of livestock from critical LCT habitat and fencing. The FS response to questions admitted Rebel Creek grazing would result in 250 more cows. FS claimed private lands in most were already being grazed and never explained how AUMs were rolled over – exchange of use – how private lands cow #s and AUMs were determined and controlled – including fencing configurations. We Object to the failure of the FS to explain how the EA effects these acquired lands in each pasture and each allotment, and the standards and use levels currently applied to these lands and how they will be changed, and where. Note that significant land areas acquired are found in areas not assessed in the MB EIS – so there never has been any look, let alone a clear and integrated look, at the SNPLMA lands and their condition at time of acquisition and their current condition, or at how they were being grazing. We Object to lack of hard look analysis under NEPA, NFMA and all other environmental laws, and failure to assess how increasing stocking imposing March use, chaos based grazing, gutting amendment 2, and other components of the EA comports with the conservation purposes for which the lands were acquired. Uncertainty and lack of data for all of this continues up to the present, and we object to the gaping 2022 EA information and analysis deficiencies.

In the Martin Basin EIS, PUCs allowed reduction in cattle use levels. PUCs are dependent on ecological conditions – example – “FAR up” condition would allow more grazing abuse than if FAR down, and the FS stated it would use the project Matrices and “best available science” vs. the 2022 EA and the 1950s era chaos-based increased grazing scheme, very harmful use periods, even more cows and stripping of amendment 2 flexibility, and use of a blindered narrow range of “range” often pseudo-science – ignoring a huge body of current ecological research submitted by WLD in this process including scientific papers and site-specific information and photo-documentation of ongoing degradation WLD has submitted to the FS in this process and other contexts. We Object to the FS sweeping an honest look at current risk, current grazing harms, degradation under the rug, and allowing streams/springs known to be actively degraded, or worsening under the EA’s “45%” and/or 4 inch stubble and other provisions of the only action alternatives. This whole process is crazy as there is no “current grazing”

alternative. WLD expects this is because the FS knows that if it were to honestly take a hard look at this complex SRRD grazing situation with high risk of significant and irreversible environmental weed, water loss and degradation, and species endangerment harms, a thorough EIS process would be essential. We Object to failure to fairly analyze the current grazing actions taking place, lack of promised Martin Basin monitoring, and failure to establish a current baseline required so any form of grazing analysis can take place with validity

We Object that the presentation of the information in the minimal SRRD EA maximizes uncertainty. For example, where did the extra Head Months/AUMs in Table 1 come from? What has the grazing baseline and “actual use” grazing been? What specifically is taking place under the status quo? There are many inconsistencies and much conflicting information in Table 1, vs. EA info in Buffalo (p. 20, Buttermilk (p. 21), Granite Peak, p. 23, Indian p. 24, Lamance p. 25, Marin Basin p. 26, North Fork p. 27, Paradise p. 28, Quinn River p. 29, Rebel Creek p. 30, Westside Flat p. 31, Wild Bill p. 31. It appears the extra head months have never been grazed, and there is no factual basis and no current systematically collected monitoring data to support the additional HMs. It is also shocking that the FS tries to skate by with an EA and fails to provide critical site-specific information on what is clearly a very complicated wild landscape. For example - the minimal info and so-called “analysis” provided for the Granite Peak allotment (see EA p. 23). Yet the AOI for the allotment contains 8 pastures/units and cow herds of 3 permittees pastures and herd sizes and the allotment includes portions of Wilderness lands, Sage-grouse habitats, Pygmy Rabbit habitats, LCT habitats, and severely trampled and degraded cultural sites. There is no data on different herding patterns, trailing and other activities by any of the permittee in the EA, no data on the grazing capacity and capability and suitability of each of the numerous pastures based on current ecological data, or based on the numerous large-scale conflicts with Sage-grouse nesting, big game seasonal habitats – fawning/kidding/wintering, and a host of other values. WLD site visits have found cows in this allotment staggering around snowdrifts on 4th of July weekend tearing muddy souls to pieces and stripping new growth just popping up above the snow, as well as grossly trampling understories of sage communities— as an illustration of how absurd and damaging the FS’s large-scale and even expanded spring grazing is in many of these allotments.

See:

flexible. If utilization levels are about to be reached prior to these dates, livestock need to be moved to the next unit or off the Forest to keep from exceeding utilization.

Granite Peak C&H Permitted Use

Permittee	Class	Permitted #'s	Season of Use
Bar X	C/C	597	5/21 – 9/30
Keystone Ranch, INC.	C/C	253	5/21 – 9/30
Woodie Bell	C/C	200	5/21 – 9/30

Granite Peak C&H Authorized Use

Permittee	Class	Permitted #'s	Season of Use
Bar X	C/C	597	5/10 – 9/19
Keystone Ranch, INC.	C/C	253	5/10 – 9/19
Woodie Bell	C/C	200	5/10 – 9/19

Pasture Rotation

UNIT	SEASON
Lower Willow Creek (2/3 of herd)	5/10 to 6/10
Solid Silver/Colman (1/3 of herd)	5/10 to 6/10
Rebel Creek (1/3 of herd)	6/11 to 7/4
Upper Willow	6/11 to 7/15
Upper Indian	7/16 to 8/10
Solid Silver/Colman	8/11 to 9/19
Lower Indian	Rest
Tom Basin	Rest

This map from the 2022 Granite Peak AOI shows how complex just a flat view of the landscape is – and in no way, shape or form does the nearly indecipherable mapping of the EA or this crude AOI pasture map provide site-specific information slope, topography, perennial, intermittent, ephemeral drainages; areas of coupled Pygmy rabbit habitat, areas of LCT streams; areas of cheatgrass infestation and amount of cheatgrass, present, areas of wilderness; areas of medusahead; areas at risk of medusahead and/or cheatgrass dominance; ecological conditions within each pasture; harms caused by each of the lethal existing barbed wire fences to Sage-grouse and big game and other wildlife – and whether it would be an ecological benefit to remove and/or modify the nightmare of existing fences; no mapping and analysis of the adverse impacts of the existing spring gutting projects, flows diverted from springs and streams, areas of perennial flows, areas of meadows, lentic areas, etc. We Object to the failure of the EA to take a hard look at the current grazing systems and “flexibility” the agency applies at present in Granite and all other allotments.

The EA and various specialist reports contain conflicting information on what species will be monitored and to which the weak and Amendment 2 gutting EA proposed action standards will apply. We Object to this.

We Object to the failure of the EA action alternatives to provide maximum herd sizes for each pasture under any category of AUMs, and to explain how average actual use head months, permitted head months relate and maximum head months relate to one another. We Object to this – as much larger herd sizes could overrun nesting, brood and wintering

sites making impacts of grazing in crucial seasonal habitats even worse for disturbing an animal's food, cover and use of space and destroying nests, eggs, and killing young animals with trampling and by making them more vulnerable to predation – and the presence of livestock attracts many types of mesopredators – due to carrion, manure, overall disturbance, and displacement of animals to sub-optimal habitats where they weaken and/or die and/or suffer predation. The reduction of protective cover in habitats also heightens predation risk. We Object to a hard look at these effects across the allotments and SRRD.

We Object to the failure of the FS to clarify if the proposed Forest plan amendment will amend the Humboldt Plan as it applies to ALL Humboldt Forest Ranger districts and fails to conduct any analysis whatsoever of the adverse impacts and undue degradation that may result across Sage-grouse, Pygmy rabbit, Bull Trout, LCT, migratory bird, big game habitats across the Forest. Or even worse – does the forest proposed to amend the Toiyabe Forest Plan somehow as well? This 1950s era EA would strip crucial protections and the EXISTING HABITAT FLEXIBILITY under Amendment 2 to provide significantly MORE protective use standards to degraded and/or higher value streams. This EA is the dead opposite of what any sane science-based Forest management actions should be in the face of the combined forces of climate change stress and the western megadrought, and also more generalized aquifer depletion across the region from center pivot irrigation depleting ground waters and/or mining-caused aquifer drawdown.

We Object to the lack of site-specific analysis of how the proposed changes will alter stream protections on each stream and spring/seep/meadow in the SRRD vs. the current level of protection, and the profound lack of current adequate site-specific data on each of these sites. What levels of protection are currently applied, and where/ Why hasn't the FS simply followed its plan and elevated protections for sage-grouse and other habitats – under the flexibility of the plan and Amendment 2? Instead this murky scheme often reduces protections and certainty.

We Object to a hard look analysis of what species are present at sites and in pastures to actually be measured at Key Areas, where and how Key Areas were located and if permittees got to lobby for sites, the lack of Key Areas across nearly the scores of unanalyzed and unassessed seeps, springs, meadows, the lack of analysis of how key Areas may be cherry-picked to minimize detection of damaging impacts. We Object to the failure to take a hard look at how a 4" stubble height will reduce protections for riparian areas in Wilderness lands. See Lamance AOI for example:

RIPARIAN SITES:

AREA	PERCENT ALLOWABLE USE
Dry Creek	65%
S. Fork Hanson Cr., N. Fork Hanson Cr., Lamance Cr., and Little Cottonwood Cr. (all below wilderness boundary)	55%
S. Fork Hanson Cr., N. Fork Hanson Cr., Lamance Cr., and Little Cottonwood Cr. (all above wilderness boundary)	45%
All riparian shrubs such as Willows and Aspen	35%

UPLAND SITES:

Use is 65% on upland sites. Key species are: mountain brome, basin wildrye, Sandberg bluegrass, bluebunch wheatgrass, squirreltail, and Idaho fescue. Use is 50% on upland browse species such as serviceberry, bitterbrush, sagebrush, and snowberry.

IMPROVEMENTS:

Range improvements listed in part three of your grazing permit must be maintained before cattle enter the allotments. The maintenance standards listed in part three of your term permit must be

Also note Lamance allotment is already a deferred rotation

The following letter documents the AOI meeting held on April 20, 2022 with you, Rolfe, Angie, Christine and Boyd and will serve as your Annual Operating Instructions (AOI) for the 2022 grazing season. The District Ranger must approve any changes to this AOI.

A deferred rotation grazing system will be implemented on the Lamance C&H allotment. Utilization sets the criteria on moving your livestock, and the scheduled dates below are a guide and are flexible. If utilization levels are about to be reached prior to these dates, livestock need to be moved to the next unit or off the Forest to keep from exceeding utilization.

Lamance C&H Permitted Use

<u>Permittee</u>	<u>Class</u>	<u>Permitted Numbers</u>	<u>Season of Use</u>
Keystone Ranch	C/C	134	5/21 – 8/31
Susan & David Kern	C/C	160	5/21 – 8/31

Lamance C&H Authorized Use

<u>Permittee</u>	<u>Class</u>	<u>Authorized Numbers</u>	<u>Season of Use</u>
Keystone Ranch	C/C	134	5/21 – 8/31
Susan & David Kern	C/C	160	5/21 – 8/31

Scheduled Rotation

The EA Veg report refers to proposed cow use any time over 3 to 5 months of year March-Nov. but this is not required for any area – it’s all speculative and nebulous where and how this will be applied and where and how this is how grazing has long been conducted. Yet there is no science-based hard look analysis of compressing use into potentially shorter time periods and/or during the extended time periods - for example with extreme mud with spring snowmelt, some drying and supposed “range readiness met” then followed by rain downpours after cow turn out, ranchers on ATVs/horses, cow dogs, etc. staggering around crucial Sage-grouse leks disturbing and displacing birds. Nor is there any hard look at the full significant range harms caused by inflicting even higher levels of grazing, and higher levels of cow trampling and weed seed spread during all seasons of the year - and the incredible damage done to protective biotic/microbiotic crusts. Many of the allotments have use over longer periods. It is also unclear if cows will be herded through already grazed pastures in being moved, and how ‘early’ moves of cows into new pastures due to high use will conflict with sensitive and ESA-listed species needs and where disturbance impacts are most damaging – for example spawning LCT, nesting Sage-grouse, Pygmy Rabbits with young in shallow natal burrows.

There are already rest-rotation and various juggling of grazing periods – so the claim that this will somehow be beneficial- by having NO specific grazing periods because cows are shuffled differently - is not substantiated by systematic information. No hard look NEPA analysis has taken place.

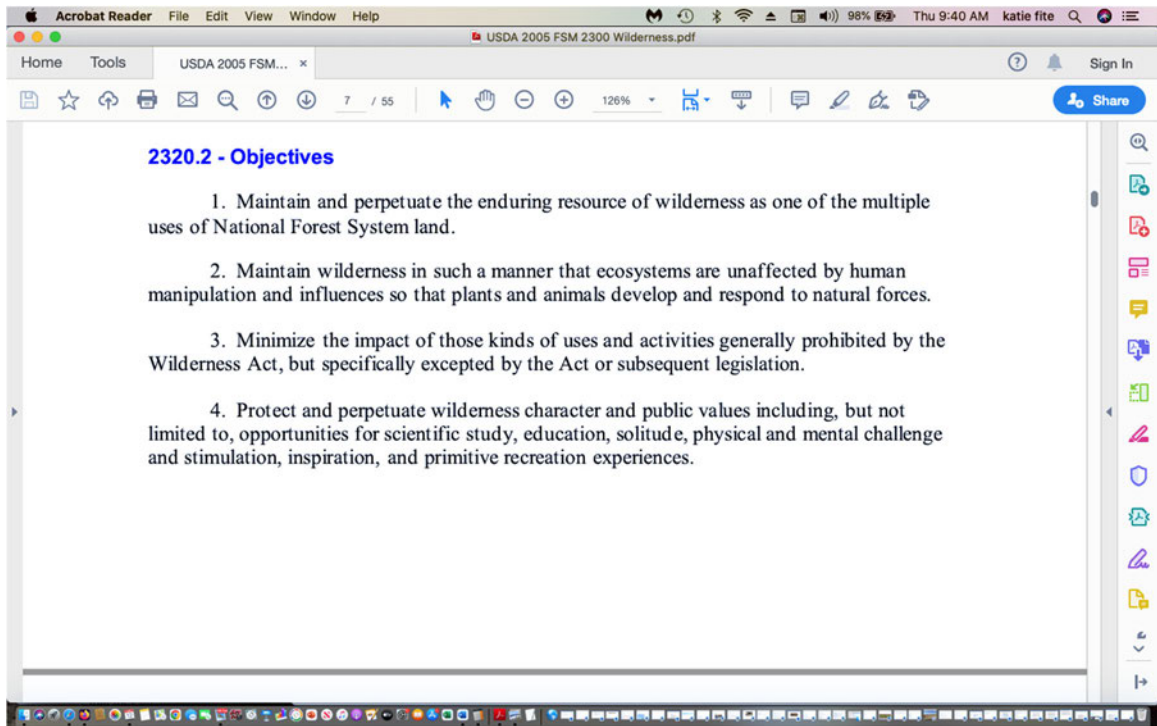
Martin Basin EIS documents 9also we are submitting these on cd by mail with this objection):

<https://www.fs.usda.gov/project/?project=2470&exp=overview>

The EA Wilderness “analysis” relies on not a shred of actual current grazing disturbance impacts data and ecological condition information and hard look at conflicts with increasing grazing during spring high use periods for example. Nor at the adverse current or other cattle facility adverse impacts at all (weeds irreversibly altering biological values and native vegetation communities and native plant and animal presence and use and survival, collision/death, predator perches, diseases – like west Nile with polluted stagnant water, etc.), their impacts to primitive and unconfined recreation, adverse current salt/supplement impacts, adverse impacts of increased cattle numbers worsening recreational, ecological and cultural adverse impacts and conflicts with Wilderness use and values, adverse current weed infestation and no assessment of weed risks and weeds choking habitats and destroying natural and scenic values of Wilderness, and monitoring, data on grazing impacts on Wilderness areas and values. there appears to be np standard Carhart or other wilderness methodology applied to actually take a hard current look at wilderness area conditions and the effects of grazing, fires, facilities, routes, climate stress that makes lands less able to withstand and recover from grazing stress, grazing-

caused desertification process and loss of perennial flows from downcutting and other cow-caused degradation, etc. We Object to the failure of the EA to take a hard, current look at threats to the Paradise Wilderness and SRRD roadless area lands natural and biological values that support solitude and primitive and unconfined recreation - (including grazing, grazing stress and lack of resiliency amplified by climate change stress, livestock facility harms, lands being overrun by cheatgrass and prevent recovery of arid lands shrubs and trees, thus reducing visual screening and a natural setting, and ruining visual quality. For example, BLM has rejected numerous areas for sagebrush due to lack of woody plant visual screening and livestock facility-marred viewsheds, the effects of pocking sagebrush expanses with an unlimited number of weed-infested sagebrush-killed salt sites, and the like. We Object to all these preceding inadequacies, and also Object to the failure of the FS to conduct any site-specific analysis of the visual effects of the livestock facilities expanded under the EA scheme. We also object to the failure to conduct adequate water quality analysis inside and outside Wilderness areas – as the smell, visual appearance and pathogenic effects to people and wildlife using grossly cow-waste polluted algae-choked water impairs wild lands values and public uses of these very important lands.

The FS Wilderness Manual includes the following, all of which the EA fails to take a hard unbiased look at, and fails to systematically assess baseline Wild land impairment and the degree of change that would take place - including permanent and irreversible harm, impairment and undue degradation – under each of the EA alternatives. There is no current baseline of cheat/medusahead/bulbous bluegrass occurrence and domination, and risk of expansion under alternatives; new and expanded riparian flow losses and severity of pollution under alternatives; effects on natural native plant and animal communities persistence and viability, etc.



We Object to the FS failing to maintain and perpetuate Wilderness values and integrity; maintain Wilderness in a way that ecosystems are unaffected by human manipulation and influences/activities so that plants and animals respond to natural forces. There has been no hard look analysis at how imposing larger herds of chaotically grazed cows - often with reduced protections – will impact the nesting, birthing, wintering and other activities of native animals in Wilderness, nor their impacts to plants – such as March-April and fall grazing harms to vulnerable soils/crusts/native veg and the role of more cows and more trampling and other disturbance to soils and protective biocrusts elevating flammable weed expansion and dominance risk, and the spread of weeds that doom the persistence of native plants and their habitats by choking soils and preventing sagebrush and other native seeds and seedlings to grow. See WLD comments, scientific documents submitted during comment on sagebrush ecosystems, and this objection scientific info on biocrust and cow disturbance, see Reisner et al. 2013⁴, Williamson et al. 2019/2020, Connelly et al 2004.

Further, underlying *Forest guidance includes:*

2320.3 - Policy

- 1. Where there are alternatives among management decisions, wilderness values shall dominate over all other considerations except where limited by the Wilderness Act, subsequent legislation, or regulations.*
- 2. Manage the use of other resources in wilderness in a manner compatible with wilderness resource management objectives.*

3. *In wildernesses where the establishing legislation permits resource uses and activities that are nonconforming exceptions to the definition of wilderness as described in the Wilderness Act, manage these nonconforming uses and activities in such a manner as to minimize their effect on the wilderness resource.*
4. *Cease uses and activities and remove existing structures not essential to the administration, protection, or management of wilderness for wilderness purposes or not provided for in the establishing legislation. [There has been analysis of the utility, condition, or adverse environmental effects of existing facilities].*
5. *Because wilderness does not exist in a vacuum, consider activities on both sides of wilderness boundaries during planning and articulate management goals and the blending of diverse resources in forest plans. Do not maintain buffer strips of undeveloped wildland to provide an informal extension of wilderness. Do not maintain internal buffer zones that degrade wilderness values. Use the Recreation Opportunity Spectrum (FSM 2310) as a tool to plan adjacent land management. [We Object to the failure of the FS to apply this].*
6. *Manage each wilderness as a total unit and coordinate management direction when they cross other administrative boundaries.*
7. *Use interdisciplinary skills in planning for wilderness use and administration. [There is no analysis of the current ecological condition of the Paradise Peak Wilderness, nor of how its veg, soils, damaged areas, conditions, stream flows etc. have changed (example - weed proliferation, loss of sage cover, loss of species, more cow projects causing degradation, etc. since designation and over time). We Object to the lack of a careful hard look analysis of Wilderness conditions, effects and threats under the EA.*

In essence, there is no valid baseline provided to base any determination of Wilderness and roadless area ecological conditions – how many data points in all the Tables in the NFMA report actually are of sites in Wilderness, and what year are they from, visual contrast and degradation and a host of other impacts and the intensity of these impacts on. On the ground systematic analysis of current Wilderness conditions and changes over time, including as caused by or exacerbated by the high levels of grazing disturbance, has not taken place and no FONSI can be signed. We object to the proposed FONSI in regards to Wilderness and all other SRRD environmental attributes, as there is only minimal to no actual current hard look info and analysis of conditions.

Wilderness lands in several allotments were vacant or closed or not grazed prior to the FS preceding Martin Basin minimal “analysis”, and it is unclear about the history of allotment grazing and vacant and closed status in the SRRD including in and outside Wilderness, on top of vital habitat for specific sensitive species, in LCT watersheds, etc. This means that any older data used in NFMA and veg and other reports and EA (such use in the flawed and deficient GRSG HAF effort in determining ground cover or other data) for the period of allotments not being grazed can simply not be used as representative of current under-grazing-stress conditions. There has been no analysis and no info on the recent history of Vacant and/or Closed grazing allotments, and under what basis and when they were opened to grazing. We Object to this lack of data and

information necessary to conduct an informed current hard look analysis and ensure compliance with NFMA, the wilderness Act and many other laws, regulations and policies.

The project's context and intensity – 12 allotments with a host of threatened biotic values, rare species, wilderness, roadless areas, etc. clearly constitutes a significant and major federal action. These minimal and flawed analysis is a dereliction of FS duty to conserve Sage-grouse habitats and maintain sustainable and viable habitats and populations, and we Object to this.

From the FS NFMA compliance document:

“Discussion: RVR Ratings on Upland Communities. There are ninety-nine studies that were assessed in determining if the upland sites are meeting DC (Table 3). Of the ninety-nine sites, 51% are meeting the desired conditions for uplands, 46% did not meet due to a high percent of cheatgrass within their community and 2% did not meet the DC for other reasons. Many of the 46% not meeting due to cheatgrass are with in areas that have had fires that have altered these sites or are on south facing slopes that are more prone to cheatgrass invasions. These cheatgrass sites have crossed thresholds that will require restoration efforts ...” NFMA analysis p. 4.

Instead, the FS EA actions would impose grazing chaos, stocking the lands to the gills under 1950s era with no basis for increases in each pasture and allotment, rampant “flexibility”, prolonged late winter-early spring use disrupting leks and a host of sensitive species reproductive periods including Golden eagles, displacing and stressing wintering wildlife (sage-grouse, migratory birds and raptors, Antelope, Mule Deer) even more, keeping cows out until November when there is no hope of re-growth when banks are grossly trampled and grazed to the nubs, further cements in and expands the already extremely dense fencing in some allotments and dense cow water projects by further gutting and desiccating meadows and punching pipelines outward for unknown and unassessed distances in uplands, unlimited amounts of salt/supplement feeding causing hundreds. Thousands of new areas of sage destruction and weed infestation, etc. Such harmful actions are proposed while the FS blindly ignores any hard look systematic analysis of the status and trends of local and regional populations, threats to habitats and actual current habitat quality and quantity, and the degree of habitat loss and change. We Object to this.

Despite the NFMA report revealing an immense underlying cheatgrass problem and great need for restoration actions and current scientific ecological studies showing grazing causes cheatgrass, the SRRD ignores cheatgrass in its supposed “capability and suitability” analysis in its minimal analysis of sensitive species, in its consultation, and in its minimal range of alternatives – further showing how Unreasonable expanding grazing is. The EA fails to identify all lands in need for restoration, and relies on almost no

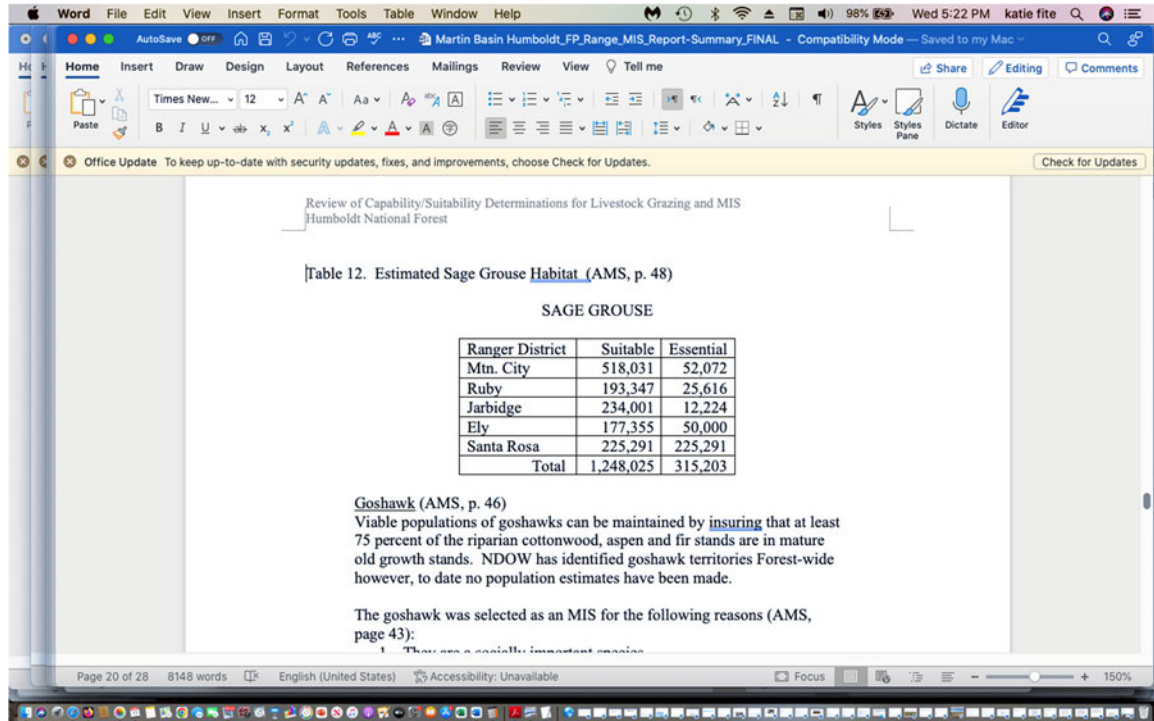
systematic currently collected data to restore them to a better functioning communities, changing livestock management will not recover these sites or move them towards Desired Conditions. We Object to the failure of the EA to take a hard science-based look at the effects of the current cheatgrass in 2022 and now medusahead in 2022 plus bulbous bluegrass often mixed in on biotic resources, watersheds, special designation areas and public use and enjoyment of Forest lands and their myriad values. We Object to the failure of the FS to address the ecological concerns related to grazing, Wilderness conditions and overall threats and ecological degradation across the affected HT lands including the SRRD and the host of important Sage-grouse, sensitive species, Wilderness quality and other values impacted. WLD raised in our 2015 comment letter on <http://www.fs.usda.gov/project//project=46107>

Humboldt-Toiyabe Forest Wilderness Plan Amendment, Austin-Tonopah and Santa Rosa Districts.

The 2022 EA NFMA report was often based on scattershot and often very old minimal and spotty data that often conflicts with admission about the proliferation of cheatgrass in the SRRD. Yet the EA reveals the FS never bothered to conduct any systematic current cheatgrass/medusahead expansion analysis and risk analysis and totally ignored Williamson et al., Reisner et al. 2103, and much other current ecological science for sagebrush ecosystems. We Object to all of this - and the deception of the public the EA puts forth in its minimal biased assessment of limited harmful grazing alternatives.

Here is a screenshot from one of the many documents (an AMS) with the previous Martin Basin process, and that past MIS review. This showed 225,291 acres of Sage-grouse habitat in the SRRD. Now what has happened that - even with old data used - the SRRD NFMA Report stated: “Of the ninety-nine sites, 51% are meeting the desired conditions for uplands, 46% did not meet due to a high percent of cheatgrass within their community and 2% did not meet the DC for other reasons”. This now indicates shows large-scale loss and degradation of existing habitat even based on the FS’s incomplete data. On top of this, the EA at XXX states cheatgrass was not currently assessed. We Object to the great level of management negligence and failure to manage to ensure viability of GRSG and sustainability of habitats. The FS clearly knows there are vast areas in great need of restoration with native vegetation - yet its EA scheme is a chaos-based grazing scheme and stocking lands to the gills violating even many of the limited and minimal BMPs, often gutting and reducing current standards and stripping the actual flexibility allowed under Amendment 2, expanding cheatgrass-causing livestock facilities including punching expanded pipelines into sagebrush habitats, and blindly ignore climate change stress interaction with grazing disturbance. This appears to be being done in order to satiate permittee greed for more AUMs and their desires to graze herds any time lands are not covered in considerable snow. We Object to the lack of hard look analysis. We Object to the EA failure to take a hard science-based look at all of these issues raised in these preceding comments re: cheatgrass, no hard look, etc. More cows = more trampling

disturbance. More early spring grazing = even more atrocious trampling impacts to soils and ripping up of crusts causing irreversible weeds – as examples of impacts unassessed.



How much of those SRRD acres now contain irreversible flammable cheat and medusahead and/or at risk of their dominance with continued (and EA-expanded) grazing levels with risk exacerbated by climate stress? That old MIS analysis used an outdated minimal look at “capability” for Sage-grouse, and now 15 or so years later, and very substantial sage-grouse declines having taken place along with large-scale habitat loss affecting this irreplaceable Owyhee Sage-grouse PMU and BSU and regional habitat areas, and no credible current new EA analysis information is provided in this process. We Object to all of the foregoing uncertainty.

Also from the MIS report: “2) *Protect key sage grouse breeding complexes; i.e. strutting grounds and associated nesting areas (IV-29). S&G designed to protect specific satisfactory habitat areas*”. [We Object that the EA fails to identify these and fails to protect these areas even in SRRD Focal habitat from being overrun with livestock, and expands intensive livestock grazing and enables more cows to disrupt and displace birds and herds to destroy more irreplaceable habitat elements. We Object to this. See Connelly et al. 2004, Gregg et al. 1994, Knick and Connelly et al. 2009/2011 *Studies in Avian Biology*, Braun 1998, Braun 2006, Belsky and Gelbard 2000. Fleischner 1994, Belksy 1999 Riparian paper, Beschta et al. 2012 and 2014, Carter (John) papers on grazing impacts and stocking and forage production and sustainability.

And: “4) Strive to achieve and maintain at least 90% of the natural bank stability for streams supporting Lahontan or Bonneville cutthroat trout. (IV-29) This S & G provides specific direction for maintaining habitat in satisfactory condition.

Forestwide Standards & Guidelines - Range:

1) Grazing systems will be developed to enhance riparian zones. (IV-32). This S & G provides general direction for moving habitat toward satisfactory condition.

“Understanding necessary management actions needed to comply with Forest Plan standards and ensure population viability and sustainable and ample capable habitat for MIS and sensitive species must be based on understanding the actual on the ground ecological conditions of these habitats and with consideration of the current population status and trends”. We Object to this necessary hard look analysis not taking place”.

There is no clear grazing system applied, no info on current trout numbers, or on a host of aquatic habitat condition data across many streams. We Object to this.

“Forestwide Standards & Guidelines – Soil & Water

1) Degraded riparian areas as identified in Water Resource Inventory and watershed restoration programs will be given high priority in the range improvement and watershed restoration programs. In addition the causes of degradation will be eliminated. (IV-48) This S & G provides general direction for moving unsatisfactory habitat toward satisfactory condition. [Here in the 2022 SRRD EA, the causes (cows)are INCREASED].

2) Protect and encourage the reestablishment of riparian vegetation. (IV-48) This S & G provides specific direction for maintaining and moving unsatisfactory habitat toward satisfactory condition. [There is no systematic current baseline data on such conditions across these SRRD watersheds].

3) July 1990 Amendment #2: All riparian areas on the Forest will be stratified into one of five management categories....These five management categories are directly tied to the desired/acceptable resource conditions.....The various categories of riparian will be managed to maintain or improve conditions..... This S & G provides general direction for maintaining and moving unsatisfactory habitat toward satisfactory condition”.

(That MIS report was submitted by WLD on CD with SRRD scoping or NOPA previous comments).

Back to the FS EA NFMA Report: Just look at table 1, 2 and other Tables. There is no date given for the data used to make sweeping conclusions.

Plus there is no info on how much of the ground cover in NFMA Table 2 is cheatgrass? Bulbous bluegrass? Medusahead? Other annuals or poor ground stabilizers?

DC #1. Ground cover. Although the Martin Basin EIS made a huge deal of monitoring and cottonwood and other specific communities THIS is what the FS uses in the NFMA report:

“No cottonwood sites are meeting the desired condition; however, only one site was sampled throughout the whole project area. Desired conditions were met at 23 low sagebrush sites of a total of 25. For mountain brush and mountain big sagebrush sites, 45 of the 48 total sites are meeting desired condition. 57 of 63 (90 percent) meadow community sites are meeting desired condition. It is unknown if sites that have no data are meeting desired condition, or not. However, these sites tend to be like the sites that have been measured so it is expected that the average percent of sites meeting desired condition also applies to these sites.

Conclusion: Overall, ground cover is meeting desired conditions at 134 of 145 (92 percent) monitoring sites”. MUCH of what this claim is based on is ancient sage data – back as far as 1979!

What is the specific date of data collection for each site’s data in Table 2 and all other Tables in this NFMA compliance report used in this and in the capability and suitability analyses? We Object to the NFMA compliance report failing to include data and analysis of many environmental attributes of the forest plan and that are necessary to ensure NFMA compliance. For example, is the FS meeting the Sage-grouse numbers and other related goals of the Humboldt Forest plan? The EA purposefully omits the Forest Plan requirement to sustain a minimum population of thousands of Sage-grouse. We Object to this uncertainty and poor analysis, and failure to provide basic information on population numbers and habitat conditions.

The report does NOT show which sites in its Tables were from 2016, and which from even earlier. The NFMA report greatly ignores the careful current systematically collected site-specific data and analysis at multiple scales that are necessary to conduct a current HAF analysis for Sage-grouse. It ignores HAF requirements for multi-phase analysis - witness the pathetically small “cumulative effects” area of the EA. This EA is a “Don’t Look, Don’t Find” agency analysis effort at its worst.

NFMA Report p. 5 *“The monitoring dataset includes measurements taken from 1979 to 2016 from a total of 217 sites on the district, including 97 sagebrush sites across the project area (Table 4)”*. The FS has failed to explain how veg info from 1979, or 1990 or 2000 relates to existing on the ground current conditions for Sage-grouse occupancy and habitat quality and quantity. Throughout our SRRD EA comments and many scientific documents WLD submitted in this process, WLD raised concerns about inadequacy of analysis for Sage-grouse and other sensitive species. WLD (and earlier Fite when with

WWP) had provided e-mails, photos and letters documenting widespread degradation of Sage-grouse and other sensitive and important species habitats across much of the SRRD. We Object to all these analysis deficiencies, and the fact that the FS ignored a large amount of degradation information, including that which WWP in the past and WLD since 2015 has submitted.

AND: *“The same dataset was used to determine sagebrush cover as described in the Greater Sage-Grouse Forest Plan Amendment. The Plan Amendment describes a desired condition that in greater sage- grouse habitats, 70% or more of lands capable of producing sagebrush have 10 to 30% sagebrush canopy cover (GRSG-GEN-DC-003). The following table displays a summary of the data by allotment and sagebrush cover range”.*

We Object to the failure to adequately explain how this 70% was currently determined in the EA and report. It also appears the FS is basing its 2022 EA veg report BA, BE, etc. for conditions related to cheat and weeds and GRSG current habitat conditions – the data is similarly as old as 1979, 2000, etc.

“Regarding resistance to noxious weeds and invasive species, review of the monitoring data indicated the amount of cover by species on the Nevada Noxious Species List. No noxious or invasive weed species were documented at 47 of 78 (60 percent) monitoring sites (Figure 1). Weed species accounted for 1 to 10 percent of cover at 12 sites, 11 to 20 percent cover at 8 sites, and above 20 percent at the remaining 11 sites. (No cover standard has been established for invasive species in the GSGFPA”. P.7. We Object to the reliance on data that has no date provided to vet how recent it all is (i.e. the Table 1 data).

AND: *“Conclusion: Of the ninety-nine upland sites, 51% are meeting the desired conditions for uplands, 46% did not meet due to a high percent of cheatgrass within their community and 2% did not meet the DC for other reasons. Many of the 46% not meeting due to cheatgrass are with in areas that have had fires that have altered these sites or are on south facing slopes that are more prone to cheatgrass invasions. These cheatgrass sites have crossed thresholds that will require restoration efforts to restore them to a better functioning communities ...”.* Even with old data, this reveals a huge problem – that should have resulted in the FS scrapping its increased grazing and facility and grazing scheme, and developing an actual range of alternatives that would conserve, enhance and restore Sage-grouse and other sensitive and MIS species and the ecosystem on which they rely. This makes the two EA grazing “alternatives” even more harmful and outrageous. We Object to the cattle industry bias of the very limited range of highly unreasonable grazing alternatives.

Table 3 uses this 1979 and other often ancient data to conduct an absurd HAF analysis in tables 3, 4, 5 and 6, and claims to arrive at a current SRRD EA 2022 HAF and sagebrush cover and forb cover and other habitat analysis. We Object to the SRRD’s mind-blowingly deficient NFMA compliance and of it HAF process/analysis as these are in

object violation of FS duties under NEPA, NFMA sensitive species policy and any rational thought processes. The FS here states it is used in the Forest Plan amendment and uses terms like “HAF-derived”– but it is unclear if that means the EA’s proposed amendment or if it was part of the 2015 GRSG plans, OR if it was part of the Trump effort to weaken the already weak 2015 Sage-grouse plans – as the date of the NFMA Report in the SRRD EA record is 2020 - it appears this slipshod report, HAF “assessment” etc. was prepared for the Trump effort was slapped down by a federal court. We object to this lack of clarity and a valid science-based hard look at sage-grouse habitat quality, quantity and habitat occupancy and the current capability of habitats to support Sage-grouse and comply with the Forest Plan.

Was 1979, 1990s, etc., data used in the figures of weeds in the NFMA report? We Object to the FS providing data and methods for making the claim that: “No noxious or invasive weed species were documented at 47 of 78 (60 percent) monitoring sites”. We Object to the lack of clarity.

Similarly, the FS conclusions about riparian conditions rely largely in very old data and field trip in July. The NFMA report states regarding Riparian data: *“On July 8 through 12, 2019, the district interdisciplinary team (including members of the public) visited several of the riparian monitoring sites to discuss their nature as being representative of each allotment. Table 8 summarizes the number of representative sites. The team visited 11 sites during the field tour.”* Pp.s 10-11.

The FS also states: *“Results of these ocular surveys, older surveys, plant community, potential changes in grazing strategies, and if the sites are lentic or lotic for each monitoring site can be found in Humboldt-Toiyabe National Forest Santa Rosa Ranger District condition of each site and compared it to the data from the last visits, then determined (by consensus) if that site was at desired condition, trending upward towards desired condition, static, trending downward away from desired condition, or if the site was not truly representative of the current range condition and subsequently excluded from determining current condition for this action.”*¹¹ Results of these ocular surveys, older surveys, plant community, potential changes in grazing strategies, and if the sites are lentic or lotic for each monitoring site can be found in Table 9. “Consensus” does not mean use of best available science -especially since there is no info in who was actually present and invited on this.

Table8. Number of representative sites at desired condition and number of monitoring sites per allotment Allotment	Number of representative sites at Desired Condition	Number of monitoring sites in Allotment
Buffalo	1	2
Buttermilk	7	10
Granite Peak	3	5
Indian	2	6

Lamance	0	1
Martin Basin	16	18
North Fork	2	2
Paradise	1	1
Quinn River	2	5
Rebel Creek	0	2
West Side Flat Creek	3	3
WildBill	1	4
Number of representative sites meeting desired condition	38	59

How old is the data for each allotment, how were sites collected, why do some allotments have a single site. And many other essential information is absent for Riparian info and all tables including Tables 8 and 9. We Object to this great uncertainty, and how “representative” sites were determined, who made this determination and other potential biases and uncertainty in the NFMA Report and EA methodology.

The bottom line is that the FS proceeds to use some wild extrapolation based on monitoring data from other unknown years, and long-outdated information and the filed tour – for which there is no info on whether the public was involved, and how conclusions were reached. Time after time, in claiming compliance with NFMA, HAF, riparian habitat conditions, etc. etc. the year of the data shown in tables and charts is ABSENT. Example: dozens of sites in Tables 2 (ground cover), 3, 9 (upland summary) Tables 4 (shrub cover), 5 (HAF sagebrush cover), 6 (HAF grass and forb cover), 7 (noxious weeds), 8, (sites at desired condition), 9 (lentic and lotic). We object to this.

We also Object to the dearth of sites in each allotment, with many pastures and/or allotments having almost no riparian and other monitoring. In Table 2, note the absurdity of only 1 big sagebrush site in all of the Buttermilk allotment. Also note this allotment was not grazed for several years due to trespass, grazing had also often been reduced when it was grazed due to violations (Fite pers. info from DR comments over the years), and it is unclear when any of the ancient or scattershot data used in this analysis was collected in relation to grazing levels and activity.

We strongly Object to the EA and underlying reports dismal lack of current systematic data and analysis across all of these “Desired Conditions” across all allotments – and the dismal failure of the FS to even provide a current assessment of cheatgrass, bulbous bluegrass, medusahead that reflects reality on the ground. This is despite 2022 satellite imagery that can detect cheatgrass/flammable annual grasses, provide current estimations of sagebrush canopy cover that should be ground-truthed, etc.

Note that the FS purposefully destroyed significant areas of sagebrush occupied by Pygmy Rabbits around 12 years ago with mowing/roller-beating/hacking projects and other projects, and has punched in many new water developments destroying sage

habitats since 1979 and also built likely hundreds more miles of weed-causing habitat harming and fragmenting fences – and much of the data relied on could pre-date these conditions. We also Object to the FS failing to reveal if data from as old as 1979 was collected in sites that have since burned. Since FS fails to provide the public with the specific dates for each sites, and then overlay that data with fire, the agency’s own destructive veg treatments, etc. this like the analysis of “no action” based on permitted AUMs/HMs is a fantasyland “analysis” exercise. We are also very concerned that the FS does not separate out bulbous bluegrass from native bunchgrasses

We Object to the EA failing to reveal crucial data on water rights for all affected lands including for all livestock facilities/developments and the SNPLMA land acquisitions, as these are crucial to understanding capacity for grazing and the effects of existing and expanded projects, and feasibility of EA proposed actions.

The BA continues in the same vein of living in the past and abject failure to provide current systematically collected data, and re-massage old, stale limited and deficient data - as WLD extensively emphasized in comments.

Examples that demonstrate the FS does not have adequate current ecological information to use to prepare a credible BA – and we Object to the FS proceeding with any NEPA document based on often ancient monitoring and very limited monitoring of a host of key attributes:

The FS appears to even have forsaken promised monitoring in a 2016 Martin Basin Bi-Op. ??? see BA p. 32.

It is unclear the current date of claims of LCT occupation based on surveys stem from.

Discussion of new expanded facilities never reveals the number, location and effects of all existing facilities despite the EA allowing ranchers to reconstruction which may be severely damaging. The BA also refers to a Cabin Creek pipeline extending out to 2-3 toughs with no site-specific data on their locations.

The BA employs a minimal and often non-mandatory laundry lists of uncertain “design criteria” that serve as no basis for valid hard look analysis and decision-making including at a site-specific level.

Monitoring is uncertain, and BA refers to info in a table 5, but the referred info is not present in BA table 5.

The FS admits the riparian habitats are “naturally fragmented” – and this makes the desertification and degradation causing flow loss even more serious for LCT and “trout”.

There is a shocking lack of current PFC data - examples: Buffalo allotment – data from 2002; claims West Side Flat Creek allotment has all standards met based on 2006 data. BA p. 29 “PFC data only exists for 3 streams in an allotment with numerous streams. The NDOW GAWS data if from 1980-2017, yet numerous streams were not inventoried in 2017. BA Table 12 shows history Andorno 2007, Indian Creek -2012, Threemile Creek 2008, BA at 31. Table 13 shows the “most recent” data - the others is older - being 2016. We Object to the use of this severely outdated information and its intermingling in charts and tables used to support claims of conditions without properly attributing the age to the various data points used – and how unreasonable and scattershot this analysis is.

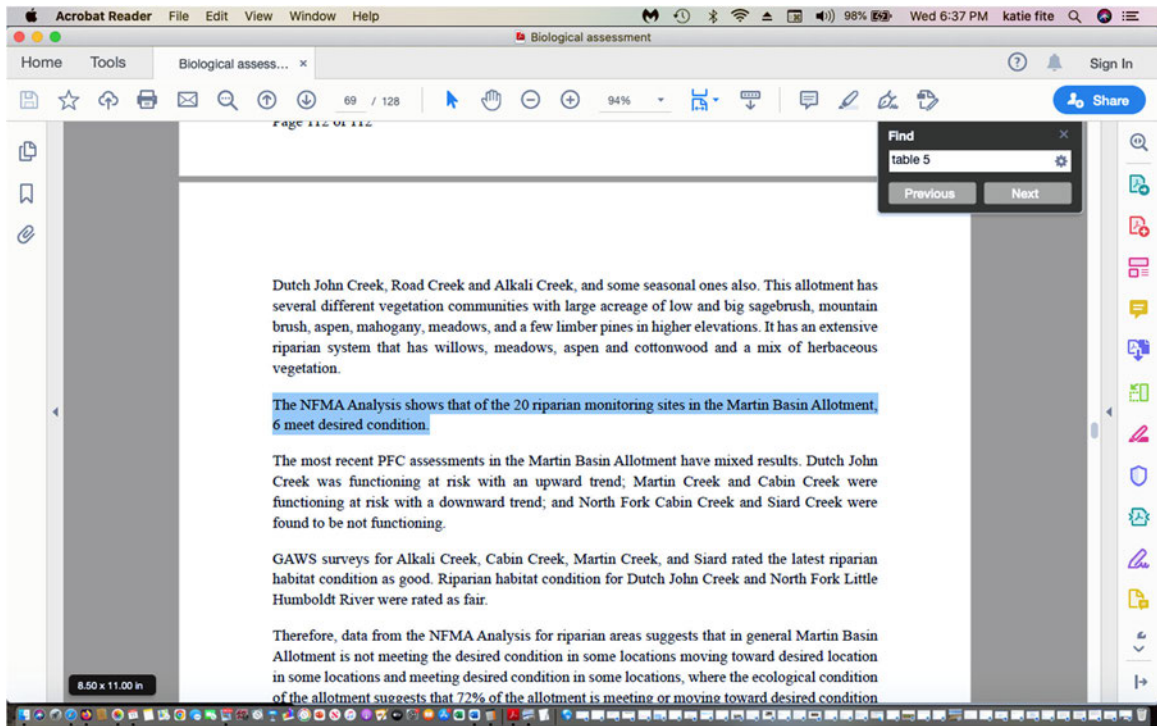
BA Table 15, based on various old and minimal data divorced from any cross-walking/comparison with actual grazing use numbers and monitoring of compliance with forest grazing standards, claims numerous areas are “meeting” the desired conditions. This blindly ignores the effects of ever hotter climate change stresses in recent years, the reduced and dried up flows in more and more stream segments resulting in cattle very severely impacting the remaining wetted areas during the mega-drought, and chronic cattle degradation being imposed at unknown levels - since actual use has never been provided throughout this period.

The temperature monitoring is not even from thermometers submersed in streams for summer through fall. In fact, it is often ends in June or July – despite ever hotter temps and ever-diminishing flows greatly stressing trout and other aquatic biota for months.

Granite Peak allotment has one single PFC assessment, despite the presence of numerous important streams. See also BA pp. 48-49.

Long Canyon creek was not even electro-shocked in NDOW GAWS visit in 2015 and NDOW noted very low discharge.

And then for the Martin Basin allotment which includes numerous lengths of lands acquire for Conservation purposes with SNPLMA funds- where only 6 of 20 stream sites are meeting goals. We Object to the FS failing to properly study, conserve and act to protect lands purchased for conservation purposes in this SRRD EA.



Botany Report

How have plants on the FS sensitive plant list changed over time? The FS has woefully failed to conduct systematic site-specific inventories for sensitive and rare plants. The FS did not even bother to look for Botrychium. We Object to the lack of rare plant site inventories and a valid baseline, and lack of substantial protections from habitats being overrun by weeds or grossly trampled by cows.

Soils

The FS states: Indicator: A minimum of 60 percent ground cover is a general standard for limiting water erosion. Is this perennial or annual plants?

The FS reveals there is significant erosion potential in wind and water in many soils – making it even more damaging to the environment to ignore protective biotic crusts, to increase cows and trampling damage and expand use periods to late winter-spring when mud will be extreme.

” 95% of the project area is Highly or Moderately susceptible to soil degradation and damage, yet the project stocks lands significantly exceeding actual; use levels, uses woefully out-dated utilization standards, and guts maximum Amendment 2 protections for springs, seeps, meadows and riparian areas.

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Table 1. Soils Susceptible to Degradation (Acres and Percent of Project Area)

Rating	Acres in Project Area	Percent of Project Area
Highly Susceptible	91,876.4	31.9
Moderately Susceptible	181,046.6	62.8
Slightly Susceptible	15,313.2	5.3
Null or Not Rated	29.8	0
	4	

Santa Rosa Rangeland Management Project
Soils

Total	288,265.9	100
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Soils Report.pdf

Table 2. Soils Susceptible to Detrimental Effects (acres and percent of project area)

RATING	WATER EROSION	WIND Erosion
High (Severe)	1369	6512
Moderate	199539	123072
Low (Slight)	87329	158651
Null/Not Rated	30	30
Total	288266	288266
	5	

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Soils report at 3:

“Excessive grazing, by livestock prior to the founding of the Humboldt National Forest, caused soil compaction, loss of effective ground cover, headcutting, post holing, and puddling. Some impacts occurred from elk but most were due to the concentrated herds of cattle, horses, and sheep. More recently, fenced grazing has altered natural disturbance patterns and created different vegetative spatial and temporal patterns than existed before European settlement. This level and duration of grazing likely had an adverse effect upon the soil resources.

Generally, greater declines in soil quality and productivity are associated with greater intensities of grazing, roads, recreational use, mining, and fire (Reid 1993)”. We Object to the lack of current data and clear science-based analysis on soils and erosion.

Soil loss and cover under the “proposed action” would not have the same effects on soils as Alternative 1, as shown in Soils Table 4. Moreover, Alternative 1 impacts must be based on that Actual Use levels of grazing that have occurred, and current integrated monitoring data. How do HMs actually grazed on the land relate to each and every year of data in the allotments where the data points since the late 1970s were collected?

Cumulative Effects

There is no valid scientific assessment whatsoever of cumulative effects – for example see preceding Sage-grouse PMU BU, local and regional populations threats discussion in this objection. The FS points to “feral horses” – but the feral horses are limited to only a very few allotments.

The FS fails to reveal the number of existing livestock facilities and salt/supplement disturbance, roading, and other areas and the cumulative disturbance effects. The FS fails to reveal the disturbance effects of existing and proposed massive veg treatments – including massive proposed BLM treatments in the affected watersheds – and further disrupting, degrading, destroying and fragmenting GRSG and the sensitive species habitats (11,00 miles of Fuelbreaks, 38.5 million acres of radical disturbance “treatments” – all highly likely to spawn irreversible annual flammable weeds.

The Martin Basin FEIS stated:

The Martin Basin Rangeland Project includes eight cattle and horse allotments: the Bradshaw, Buffalo, Buttermilk, Granite Peak, Indian, Martin Basin, Rebel Creek, and West Side Flat Creek allotments. These allotments currently have permitted grazing use with the exception of the Bradshaw and Rebel Creek allotments, which are vacant ... Currently 17 permittees graze 10,087 head of cattle and 25 horses on the Santa Rosa Ranger District. Within the project area, there are 12 permittees with permits to graze 5,305 head of cattle and 25 horses. The grazing season for the allotments in the project area is generally from May 21 through September 30. There are no permits to graze sheep on the district.

The Nevada First and Rebel Creek properties, lands recently purchased by the Forest Service, are found within the project area and have been considered in this analysis”.

We carry forward into this Objection all of the issues and concerns raised in the following conservation comments on the Martin Basin EIS, as they have become even more relevant in 2022. WLD’s Fite prepared the MB EIS comments and they are a matter of public record. Underlining highlights matters and issues of key concern that must be addressed in 2020, though specifics may vary slightly (but not much!). All of these issues, questions and concerns must be fully addressed by the FS now, in a hard look NEPA analysis and analysis of the compliance with the Forest Plan and NFMA, NEPA, the ESA, the Clean Water Act, the Migratory Bird Treaty Act, the MHPA and other legislation and FS regulations in this 2020 EIS process.

MB EIS COMMENT ISSUES AND ECOLOGICAL CONCERNS THAT MUST BE ADDRESSED IN CURRENT SRRD ANALYSIS - AND A NEW EIS FOR THE SRRD

We also incorporate these older comments into WLD’s January 2023 SRRD Rangeland EA Objection. They were previously submitted by us in this process on cd.

... the Forest continues to pursue a highly uncertain loose and open-ended adaptive management grazing scheme, while planning to stock lands not capable of withstanding livestock effects even under the agency’s own definitions.

This whole exercise is an effort begun years ago under industry-driven Bush administration policies. Its purpose is to gut the requirements of Amendment 2 that require accountability by the public lands livestock industry.

Foundation of Grazing Analysis in the “Rangeland” EIS is Livestock Industry Myth, a Greenhouse Study from the 1950s, and a Pamphlet --- Ecological Science Is Cast Aside, Minimized, or Belittled

Just like in the previous Martin Basin EIS effort, the Forest continues the scientific blindness. The Forest centers its grazing effects analysis – and thus the whole EIS effort – around a greenhouse study on effects of clipping grass (Crider) and a pamphlet (Dietz)

describing “Grass, the Stockmen’s Friend”. NEPA, NFMA, the ESA, the Data Quality Act, Forest policies and the public interest require that agencies use sound and current science. Centering its understanding of grazing effects on an indoor study and a booklet poisons the entire effort. This also results in a disastrously high use/utilization across uplands, and status quo “permitted” stocking rates above levels able to be grazed on these lands.

A broad body of current ecological science is ignored or only paid lip service. There is no integration of grazing trampling from the gross overstocking of the “permitted AUMs” fostering cheatgrass through damage to microbiotic crusts, shifts in species composition over time, disruption of watershed processes or any other factors. Instead, the EIS is based on a simplistic fairy tale world view of grazing effects. “Take half, leave half” has been shown to be a resounding failure as weed invasion sweeps the sagebrush biome, native species habitats are further altered and destroyed, ecosystems unravel, and sensitive species face reduced viability and imperilment. See Status of the Nation’s Biological Resources (1998), Belksy and Gelbard (2000), Dobkin and Sauder (2004), XXX “triage”.

The Forest must start this process over (see discussion of Purpose and Need), and base any analysis here on a broad scientific integration and honest analysis of the effects of grazing and trampling on shrubsteppe and other native ecosystems in the arid West.

Forest Blissfully Ignores Desertification Processes, Climate Change, Global Warming Effects on Uplands, Losses of Springs and Seeps, Degraded Drainage Networks, Watershed Processes, Biodiversity, Habitats and Viability of Important and Sensitive Species

Livestock grazing disturbance promotes desertification processes in arid western lands. It makes sites hotter, drier, depauperate --- and more desertic.

For example, see

<http://www.climatescience.gov/Library/sap/sap4-2/final-report/default.htm>

“Several examples of threshold crossings or transitions that illustrate this definition are described in Groffman et al., 2006. These include the interactions of drought and overgrazing that trigger runaway desertification, and the exceeding of some critical load, as with the toxicity limit of a contaminant or elimination of a keystone species by grazing, so that when one component of the system fails, it provokes a domino-like cascade of instability that substantially alters the rest of the system.”.

Chronic livestock disturbance here has caused and continues to cause desertification. This represents local climate change and feeds into the global warming cycle. See Sheridan CEQ 1981, Dregne 1986, Steinfeld et al. 2006, Fagre et al. 2009 <http://www.climatescience.gov/Library/sap/sap4-2/final-report/default.htm>. Livestock emit methane, a potent global warming gas. Livestock removal of vegetation and trampling causes alteration of community composition, function and structure (see Sheridan 1986, Fleischner 1994) and adverse effects to microbiotic crusts and native vegetation reduce the ability of wild lands to sequester carbon --- naturally. Yet the Forest, fixated on some placid greenhouse study 1950's world view of cattle effects, and concerns (including over greenhouse gases!) ...

Proposed Action Removes Accountability and Adaptive Actions Under Amendment 2, and Imposes Uncertain Adaptive Management Scheme that Strips Rancher Accountability

The Forest actually gets rid of the best adaptive management action it has: The Adaptive action is the No Action Amendment 2 provisions that serve as triggers for removal of livestock during the grazing period in any one pasture or area. Amendment 2 requires that grazing livestock be moved out of pastures as standards of use are met, not in fall at the end of the growing season after grazing damage is done, or use levels exceeded during sensitive periods. Amendment 2 standards are triggers for removal of livestock to prevent new damage. Under the new scheme with much less accountability and thus much greater uncertainty, new livestock damage can happen each and every year as nothing exists that prevents it. This also allows greater use to occur in lands grazed in late spring and early summer during the active growing period or with exceptional rains, as plants may be grazed to very low levels including during sensitive nesting and birthing periods for native species, and some "regrowth" occur but the levels of use are not measured until the fall. Thus there will be no way to track habitat effects during critical periods. By the time the growing season ends, no regrowth is possible. Plus, in moister and mesic areas, regrowth may also occur after cattle leave but serious bank and other damage persist, as well as damage to plants from suffering heavy grazing - thus weakening 'desirable' mesic and hydric species and causing shifts to the Kentucky bluegrass and other weedy species that are poor bank stabilizers. This condition is prevalent in many portions of the EIS lands. Under this scheme, it will only get worse – as levels of severe use will not be detected or prevented. Nor will hoof trampling damage to banks, a critical factor that must be controlled and minimized to protect watersheds, ESA and sensitive species habitats and populations, and aquatic habitat components. Under the Forest Plan and under Amendment 2, the Forest has broad latitude to apply LOWER use levels than at present, and also apply standards to protect soils, including bank trampling standards across all riparian and meadow habitats. It has failed to do so, despite WWP requests. Now in the EIS not only does the Forest try to get rid of Amendment 2 without ever having implemented many of the potential actions the Amendment and the Forest Plan

allow, the Forest never even considers critical stream and springbrook bank trampling protections under No Action or the Proposed Action.

In the DEIS's highly uncertain AM scheme, grazing standards apply only at the end of the growing season – which is fall. Year after year, under the Forest's Proposed Action grazing and AM scheme, standards can be exceeded, and all that will happen is something different under the new AM will be developed behind closed doors. Or band-aid 'temporary' fences will be slapped up without adequate NEPA processes – thus shifting and concentrating cattle damage in other areas, extending irreversible soil erosion, weed invasions, LCT habitat, sage grouse habitat, pygmy rabbit habitat losses and harms.

Then, in the Forest's longer term complex and unrealistic monitoring scheme, making changes on the ground like cutting cattle numbers/AUMs is based on complex, uncertain and expensive vegetation community monitoring that it is highly unlikely will ever occur. The Forest has had a very limited staff and budget, and with the current financial crisis facing the country, relying on the complicated and elaborate schemes for an "ideal" condition of various vegetation communities makes no sense. The Forest is unlikely to have sufficient info --- ever --- to conduct studies adequate to track the complicated criteria it has established. If the Forest is going to adopt such a risky scheme, then the EIS that does so must provide a current systematic ecological survey across all uplands and watersheds, and the Forest must include an Assessments of the risks of continued cheatgrass and other weed invasions and losses of sage-grouse and other sensitive species habitat based on comprehensive ecological data to serve as a baseline. The Forest needs to be honest with the public and provide a history of how strapped for funds, personnel, and the frequent personnel shifts in the Forest that result in the inability to monitor adequately even now with a much less demanding system. The public deserves a real-world analysis, not more fantasy-based management like stems from the Crider greenhouse snipping and the Dietz pamphlet.

WWP has called the Humboldt-Toiyabe Forest about serious concerns over grazing effects – and we frequently get told "we just don't have enough staff to monitor all if it, to get out there in time, etc.". How in the world can the Forest expect the elaborate Matrix scheme to ever work in the real world? How much time and effort will it take? How much will it cost? How many personnel? What if funding is cut below even the present levels. The Forest certainly won't be able to pay for it based on the \$26,000 estimate of grazing fees it annually receives (typically much less than this because AUMs actually being grazed are below "permitted" paper cow levels). Grazing fees won't hardly pay for a summer temporary. The Forest (in its greatly inadequate economics analysis and throughout the EIS), bases its no action alternative, "baseline" condition understanding and analyses on the bloated "permitted" stocking rates. These include a large number (never revealed) of AUMs that are not used on a regular basis.

Without providing a year-by-year accounting of actual use (number of cattle grazed and how long – AUMs) pasture-by-pasture and allotment-by-allotment, it is impossible to understand the environmental baseline, develop an adequate range of alternatives, analyze environmental effects,

The EIS fails to provide critical info and analysis on Actual Numbers of Livestock Being Grazed, and annual and other Monitoring showing the effects of such use.

This can only be viewed as an effort to artificially prop up the re-sale value of a grazing permit by through continuing to ignore that violation of standards, depletion, desertification, drought, non-compliance and other actions all have resulted in far fewer livestock being grazed than shown on paper under “permitted” AUMs.

An honest and scientifically valid EIS process can not occur until the Forest does this, and levels with the public instead of trying to cove up and keep re-sale value of permits high.

This and other “nuts and bolts” information on how grazing has actually been carried out in the Santa Rosas in recent decades up to the present is essential to understand the number of AUMs grazed/stocking rate, how long cattle are present and where, etc - and other cow basics that have caused the levels of degradation - and few areas of lead to the areas of claimed improvement on the Forest must be provided and analyzed.

All the Forest does is to say there used to be scads of cows and sheep a hundred years ago, and now there are many fewer and only cows. While there may be many fewer cows than in 1890, damage is additive, cumulative, and the real number of cows being grazed on the land in recent years is necessary to understand effects of any proposed actions- and to conduct adequate consultation with USFWS over impacts to ESA-listed species, or discussions with state Game departments or other agencies over the environmental effects of an agency’s decision. Actual grazing use and real world stocking also must be factored into understanding of the capability analyses (rangeland, MIS, sensitive and other species) and the suitability analysis. If only half the AUMs were being grazed in a particular land area, would grazing/stocking up to the “permitted” paper number of AUMs force cattle to crisscross more areas of steeper and unstable slopes to find food or water? If so, how many more acres of non-capable lands will be intensively disturbed? This especially the case in many of these allotments, where “capable” lands are often non-contiguous, are found in scattered patches, and/or already highly degraded by diminishment of understories, weeds, erosion, compaction, etc.

If only half the “permitted” AUMs have been grazed in recent years in a particular ESA habitat or sage-grouse nesting areas, and now the Forest proposes an allocation allowing double the actual use to occur indefinitely – this must be woven into all EIS analyses, including allocation of AUMs under the EIS. Double the number of cows means double the amount of trampling disturbance. Where would grazing the “permitted” number of

AUMs on an annual basis exceed what actually has been happening on the ground. Plus if the Forest is to adequately examine the effects of its actions and the interplay with climate change, including climate change in amplifying grazing disturbance effects here, or to account for the methane produced, it must know how many cows have been grazed and where.

Another part of the grazing mechanics that is overlooked is the effects of seasons of use, turnout times, etc. – from disturbing nesting birds in late spring to concentrating use on a handful of perennial stream areas in late summer. How do AOIs over the past 20 years inform effects on sensitive species, ecological conditions, population losses or viability?

Serious Ecological Harm to Spring and Seeps Not Examined – Baseline Studies and Analyses Lacking

The Forest DEIS, little changed from the prior effort, simply does not provide and analyze adequate data on water, watershed processes and drainage networks. This is especially the case with spring and seeps and small drainages (intermittent , ephemeral and some perennial drainages too), and the upland ecological conditions and vulnerabilities across the Santa Rosa Range landscape. With continued grazing disturbance.

Data Across Vast Uplands Is Limited and Cherry-Picked

Plant communities across the District are often not nearly as discrete as one would think. Mixed species areas, weed lands, etc. fall through the cracks. The Forest’s cherry-picked and limited upland data sites, illustrate this. Surveys to date seek out more “pure” or “ideal” communities to assess. There is no evidence than any systematic upland vegetation inventory has been conducted. It appears to us that the Forest plans to apply no standards to the highly disturbed areas, and has not identified areas and degrees of disturbance here.

We are alarmed at how the EIS ignores disturbance-related weed infestation and expansion, or accurately tracking veg and soil and habitat disturbance and degradation from its own treatments over past decades.

Invasive Species Ignored in Most Parts of EIS – Particularly Grazing

The EIS continues its greenhouse clipping is the same as cattle grazing and trampling disturbance, and its Stockmen’s pamphlet world view in NOT considering invasive species as a major concern, and trying to hide grazing effects (see for example Belsky and Gelbard 2000 and the abundant recent literature on microbiotic crusts) by analyzing primarily noxious weeds. Across public lands, noxious weeds are more typically more limited in areal extent than invasive species like cheatgrass shirks integrated consideration and analysis of invasive species as High Priority concern – especially with

grazing analyses. This is ecological madness. The Forest focuses on noxious weeds, not the highly invasive cheatgrass, annual mustards, Kentucky bluegrass and many other species that are prevalent in many sites across the EIS area, but that

All of this information is essential to inform full understanding of effects of stocking levels, use levels, and continued grazing vs. No Grazing. It is essential for understanding the suitability of continuing grazing and trampling disturbance in lands at High risk to cheatgrass expansion under grazing disturbance, or in understanding how much and what type of herbicide use is occurring or foreseeable, and the suitability of continuing grazing in watersheds inhabited by Lahontan cutthroat trout (native salmonids are highly sensitive to herbicides, as new research is showing). It is essential to understand the effects of finding grazing continues to be suitable in habitats of pygmy rabbit or sage-grouse that are at risk of expanded cheatgrass or other invasive species with continued grazing disturbance of vegetation and microbiotic crusts. Weiss and Verts (1984) found pygmy rabbits in only 2 of 51 sites occurred where cheatgrass was present. This study re-visited Oregon shrubsteppe historical occurrence, and found rabbits at only 51 of more than 200 formerly occupied sites. Nevada inventories (Larrucea) are aberrant in that they seek to discount the absence of the species at the historic site. Cheatgrass is now known to be expanding aggressively into mountain big sagebrush sites, particularly with disturbance. See Peterson (2007). See also the Nevada and Great Basin Regional analyses conducted by BLM and USGS from 2003 to 2005 or so. Separate chapters appear under lead author names Wisdom, Rowland, Suring – variously and are available at the USGS Website. These were based on 2003 or so datasets and the situation is now known to be a lot more dire regarding cheatgrass. This info was suppressed from integrated publication during the Bush admin –but is widely available to federal agencies. It is inexcusable for the Forest to try to continue to rely on its greenhouse clipping and the Stockmen’s Pamphlet, and not address the profound ecological concerns such as shown in these analyses, the current ecological literature on microbiotic crusts, and info in Connelly et al. (2004), Dobkin and Sauder (2004), even USFWS 2008 Interim Status Report on GSG, recent info on climate change etc . ALL of this info must form the basis of modern day capability and suitability analyses, and understanding capable habitats and sustainable levels of grazing use (if any) in arid lands.

The EIS forsakes analysis of an Integrated Weed and Vegetation Management strategy. These degraded areas serve as centers of infestation and then expansion of weeds. These degraded areas represent habitat fragmentation – along with all the roading, livestock facility “scorched earth”/dead zones associated with water troughs, fences, trailing routes and the like. Vegetation treatments also represent habitat degradation, alteration and loss. You have failed to assess this across the Project Area.

We have seen how this works in the Jarvis BLM lands. Agencies often purposefully ignore “mixed” communities especially if they are weedy. Agencies seek out the most “pure” community forms to monitor. This biases monitoring, and it is not systematic and statistically valid as a representation of the condition of the landscape. “Pure”

communities are commonly less impacted by livestock. So focusing monitoring on these areas will not represent the areas often most suffering from livestock disturbance. This also overlooks the fact that communities are dynamic over time, and successional processes may be occurring. It may also overlook the most seriously degraded communities. For example, a small aspen patch with five struggling cattle-chomped and scarred aspen is VERY unlikely to be chosen as a monitoring or representative area. Instead, the Forest is much more likely to choose an extensive aspen area, which may be extensive ONLY because it has suffered less livestock damage in the past.

Vegetation communities are not separate or discrete, but merge and blend with each other. The Forest has provided insufficient analysis on how it has determined what community exists where, the criteria for community discreteness, whether the Forest will monitor and base decisions on ALL community types in any pasture or area, where a vegetation type chosen for monitoring will be located in relation to water, and other info essential to understand current ecological conditions and watershed integrity. This baseline info is essential to understanding how and where this elaborate and complicated monitoring system would play out over the landscape. For example, there are many Wyoming big sagebrush islands interspersed in low sagebrush communities – yet Forest monitoring points fail to represent them. There are bitterbrush-big sagebrush communities on north faces and coarser soil areas, yet mapping fails to represent them.

Our review of Mapping in the EIS Appendices finds that the Forest has collected little new data or information on ecological conditions across the vast uplands since its previous EIS effort. From the limited info that has been collected, it appears that sites in uplands that are distant from water and free of weeds are the sites that were examined. Please provide detailed information and analysis of how any upland sites were chosen. Was there any kind of stratified random sampling involved in baseline data gathering? How close were any of these sites to water? How many different sample areas (randomly chosen) must be examined for the data to be statistically valid?

The Forest tries to rely on “historical” photos – from periods like the 1930s to claim change have occurred. There is no analysis of the profligate burning and other disturbances that may have caused conditions in “historic” photos – despite an abundance of info even in the range literature on the scale of past grazing and other activities including burning of native vegetation to promote forage and an association with settlement activities. A younger aspen clone on the 1930s just means it was likely recently burned by cattle or sheep men or wildfires.

Info is not provided on the time of year and timing of grazing in association with photos and other comparative info in the EIS.

The Forest fails to provide accurate data from its files on veg treatments over all periods of time – especially from the 1950s up until 2002 or so. This renders any comparisons

between photos from one point to the other invalid. The Forest does not reveal what was or was not done to vegetation.

There are no systematic lentic inventories across springs and seeps, critically important habitat components.

The vegetation map in Appendix F seems to present an "ideal" vegetation community type – showing communities that would exist at "climax". Why does it not show all the burned, mowed, cheatgrass-dominated and cheatgrass-infested areas. It does not show areas of sagebrush communities where chronic grazing disturbance has reduced understory grasses and caused shifts in species composition to smaller less productive species and a more desertified condition.

Yet these are the conditions that exist across a significant portion of the EIS area. It is as if the Forest is ignoring the harsh reality of the cheatgrass, white top and other Weeds that are spreading under livestock trampling and management activities such as salting/mineral supplement, pipeline fences, and other sites.

In the Martin Basin landscape, a series of wildfires, fanned by degraded cheatgrass understory conditions have, have removed native woody vegetation. Such effects are not fully shown on mapping. It is uncertain how this disturbance was or was not integrated into capability and suitability analyses as well. How has cheatgrass been dealt with in these analyses, too?

ALL OF THIS IS EVEN MORE UNCERTAIN IN 2020, AND THE NOPA IS DEVOID OF ANY CONCRETE INFO EXCEPT THE HUGE NUMBERS OF CURRENT AND EXPANDED AUMS, AND GENERALIZATIONS ABOUT GRAZING SCHEMES AND EXTREME USE LEVELS.

Adaptive

The "adaptive management" envisioned here will allow for political maneuvering by the livestock industry. It shuts the public out from critical parts of the decisionmaking process, as changes can be made hidden from public scrutiny and oversight.

It has been a hallmark of the Bush administration that secrecy and favoritism for industry trumped all. All manner of smokescreens were thrown up to strip accountability from industry. A series of EIS processes were undertaken with parallel flawed and industry-friendly/driven "adaptive" schemes that lacked certainty in addressing ecological problems and left landscape vulnerable to increased and irreversible soil erosion, loss of microbiotic crusts promoting weed invasion, watershed unraveling, losses in quantity and quality of water, losses, degradation and fragmentation of habitats and loss of viable populations of important, MIS and sensitive species, accelerated desertification, loss of recreational opportunities for the public, and loss or decreases in the ability of these lands to naturally sequester carbon. Thus, we ask that the Forest make a fresh start, and analyze

a broad range of alternatives that get rid of the loose, uncertain and behind closed doors adaptive management, and the complicated matrices. Specific sideboards should be placed on AM actions, and responses – and a range of alternatives examined here.

Base analysis on “reserve” and other ecological concepts (See ICBEMP EIS process).

This EIS promotes this tainted legacy of stripping regulations and controls from industry on public lands through closed door processes and uncertain adaptive management, as well as relying on livestock industry myths (the Sunshine Press “Stockmen’s” pamphlet and Crieder greenhouse clipping studies) as the basis for its world view of grazing effects. Several elements of the EIS would be very detrimental to the lands, waters and very important species habitats and populations that are “at risk” in the Santa Rosa District.

Why doesn’t Forest examine ecological conditions across ALL the allotments of the Ranger District? Detailed info is critical in understanding direct, indirect and cumulative effects. The Forest is quick to claim that there are 17 permittees across the District when it is trying to puff up “economics”. But then it hides the damage being done on the allotments in this landscape that are left out of this EIS. Understanding the degree and severity of degradation occurring on both OTHER Forest allotments and the BLM allotments which many of these same permittees also graze, is very important to understanding effects on populations of important and sensitive species, watersheds and watershed processes. This is essential to understand all indirect and cumulative effects.

SUBSTITUTE BUSH FOR TRUMP.

Goal

The EIS Goal shows overwhelming bias to the livestock industry. We OBJECT to this goal. It places overwhelming emphasis on livestock permittees and “economics”. The DEIS must be re-issued, or a Supplement prepared, with a different Goal that encompasses the values of these Lands to the public –not to a hand full of politically connected cattlemen. The Forest has also strayed from original Scoping.

The project’s goal is to manage livestock grazing in order to offer opportunities for continued social and economic value to grazing permittees in a way that sustains the health of the land.

If the Forest is going to claim it is examining economic factors, then much more solid and extensive detailed financial info and disclosure is required. Please provide detailed records and analysis related to their financial status, land sales, liens on base properties, real estate interests, subsidies received, private property feeding and other aspects of any and all livestock or other undertakings these permittees are engaged in. Please also provide detailed analysis of ALL public lands – including areas like the extraordinarily

degraded Williams Stock allotment and others, that these same Forest permittees graze as part of one operation. In fact, there is often pressure on the BLM to allow cattle displaced by exceeding use levels from the Forest to be moved onto BLM lands – thus shifting and intensifying degradation of BLM lands. What is the value of the topsoil that erodes annually from head-cutting drainages and dying meadows? What is the value of water wasted and polluted by livestock and lost on all BLM and Forest lands grazed by these operations? What is the value of the wildlife populations that are lost or diminished due to degraded habitat stemming from these livestock operations on Forest and BLM lands? What populations are vulnerable to extinction, and what would be any cost to recover these, all or in part due to the chronic livestock grazing disturbance from these operations? Please include aquatic and terrestrial populations in your analysis. What is the value of 30 miles of restored Lahontan cutthroat habitat in Martin Basin that would provide for healthy metapopulations of LCT? How does this compare to the losses to taxpayers from the grazing operations that are currently precluding ecological recovery through continued and chronic grazing disturbance? Please provide any and all relevant data and records in a series of Appendices. How much is grazing here costing U.S. taxpayers annually? What is the budget of the Santa Rosa RD office? How much of that is related to grazing, or the mitigation of grazing disturbance effects to wildlife, watersheds, aquatic species, native vegetation, recreation, cultural sites, etc.? What about other agencies/operations of the federal government? How much money are other federal and state sinking into activities related to these ranch operations? Please include Wildlife Services predator activities, spraying for grasshoppers and Mormon crickets that thrive in disturbed "rangelands", weed "control"/spraying, livestock facilities, maintenance of roads that exist for livestock management purposes, etc. How much do these permittees receive in various disaster payments? When? Have these permittees gotten drought payments or other assistance at the same time as the Forest has allowed them to turn out livestock on parched Forest or BLM lands? Please provide a detailed analysis of this – How can it be so dry that drought emergencies are declared/disasters happen - yet large herds of livestock have still been allowed to be turned out on the very water-limited and cheatgrass/weed vulnerable lands of the Santa Rosa District and linked BLM lands as well? The Forest must be able to acquire this data from other agencies like USDA or other parties. What are weed spray costs to taxpayers from these ranching activities on an annual basis? Please provide detailed figures.

What is the global warming "cost" of the ranching activities here, under all alternatives? Please provide detailed analysis of methane and other global warming gases produced, including gases from fossil fuels burned in association with the livestock operation and agency oversight and attempted mitigation of grazing disturbance impacts. Please provide an estimate of the monetary costs/value of the carbon/greenhouse gas and other global warming contributions from these livestock operations – produced or resulting from these operations. To what degree are lands desertified (thus hotter, drier, less productive), and what is the cost of the global warming effects of these depauperate conditions?

How much do mature cows now weigh? 1000 lbs, or more? What was the weight of a cow factored into old forage inventories and old AUM calculations? What was the cow and cow:calf pair water consumption factored into previous sticking rate analyses? How has this changed? What flows at springs and seeps are necessary to supply herds? What rate was used in understanding how to apply any capability analysis?

Plus, we ask that you carefully review (and include in all analyses of indirect, synergistic and cumulative effects of grazing here), the full range of information on how BLM is managing public lands, waters and habitats for native biota. ... challenged this as part of its Great Basin sage grouse litigation over a pattern of reckless and unlawful agency actions over the past 8 years affecting the Great Basin and other sage-grouse populations in the West. BLM ignored serious consideration of the large-scale desertification caused by its past and current veg killing treatments and 50 or more harmful livestock water developments that have altered and destroyed and degraded nearly every intermittent, perennial or other drainage and spring in this landscape. BLM's decision also includes allowing an additional 10% grazing use in this landscape in native veg communities like sage-grouse and pygmy habitats under a highly uncertain TNR (Temporary Non-Renewable) grazing scheme. This means that not only will BLM be allowing 10% greater stocking rates on this allotment, since the Actual Use in Williams Stock has been well below the permitted AUMs, BLM has now authorized in reality be much higher stocking on critical sage-grouse, pygmy rabbit, big game and other habitats for the next decade. This higher stocking and TNR would occur in a landscape connected to the Forest lands – where the springs, seeps and drainages are dying – that is the whole reason the permittee Cassinelli wanted to re-gut springs, line stock ponds, and otherwise try to eke out a few more drops of water in the desertifying landscape. How do the very degraded conditions on these adjacent BM lands affect sage-grouse and pygmy rabbit and other important and sensitive species habitats and population viability?

Thus is the type of info that must be integrated into BAs/BEs/BOs, and the EIS analyses – to understand habitat and population constraints and viability concerns. Sage-grouse are landscape species. Pygmy rabbits are highly vulnerable to extirpation if habitats become severed and fragmented – including by unsuitable expanses damaged by livestock. This type of info on the crisis in the landscape must be fully integrated into all Biological Assessments, BAs, BOs, etc. in order for the Forest to have fully considered all direct, indirect and cumulative effects on waters, watersheds, and populations of native plants and animals.

... a stay on the Livestock Facility Project (gutting and re-gutting and cementing of springs and ponds) part of the Williams Stock decision but did not get a Stay on the grazing and gross overstocking part of the decision. BLM then remanded the 50 project excavation/development, re-development, etc. part of the grazing scheme. This involved re-gutting of dying springs and seeps, lining of stock ponds dug into drainages with concrete to try to trap water from desertifying drainages, etc. We also stress that all of

these stock ponds and other livestock water developments in the landscape (BLM, Forest, private) significantly increases the chances of West Nile virus.

So as part of the costs to the public and wildlife, please also analyze the potential costs associated with disease risks to humans and wildlife from grazing use on Forest and BLM lands here.

The Forest must provide detailed mapping and analysis of all livestock infrastructure, water developments including spring developments and/or diversions, de-watering-gutting projects, stock ponds, troughs, pipelines, water haul sites, etc. This is essential to analysis of the degree and severity of habitat degradation and fragmentation this all imposes on this landscape and the populations of sage-grouse, pygmy rabbit and other wildlife, including aquatic biota, that inhabit it. This includes on intermingled private lands, as well as all adjacent BLM allotments or any allotments grazed by permittees whose Forest operations are included in the EIS. Both the ecological costs of the degradation these facilities are posing to natural systems, as well as the costs of these facilities, and the costs to remove and restore lands must be determined. This is especially critical since this EIS proposes imposing even more infrastructure on already stressed wild systems. It also fails to carefully catalogue, map and identify effects of all existing livestock facilities, developments and diversions.

Please see CEQ Sheridan (1981), Dregne 1986, Steinfeld et al. 2006, and XXX and fully integrate this information into any economic claims you make and analyses. Please also consider all ecological effects – including no important and sensitive species – of desertification and global warming/climate change processes on the Santa Rosa landscape.

Please also provide a breakdown, by permittee and/or permit, of all of the above information. The Forest claims permittees have invested in this all – who has invested what, and where? How much have taxpayers sunk into a continuing loss of waters and wildlife here?

Please provide detailed actual use records (number of AUMs actually grazed vs. “paper cows” on permits) by allotment, pasture, land area and all details for all time periods available. Please also include the AUMs, stocking rates in each land area, (permitted and actual) prior to any AUM conversion. Was there an NEPA analysis, and any capability, suitability, productivity or other forage-water-resource by class of livestock analysis - conducted on the past AUM and livestock class conversion? If so, please provide us with a copy, and a supplement to the DEIS that explains how current stocking rates on paper were arrived at for all affected land areas.

Please also describe in detail how the Forest has dealt with determining use levels and stocking rates during drought – and how specifically this will occur under the EIS. To

what levels (provide specifics) will livestock numbers be cut? What level of drought will result in no livestock being turned out?

Cheatgrass

The EIS is schizophrenic in dealing with cheatgrass.

While steadfastly refusing to consider invasive species an important issue (including in stocking, capability and suitability analyses) the Forest describes significant areas with cheatgrass problems.

Please describe how many acres, and identify specifically where, across the District, cheatgrass has increased, now dominates understories, or otherwise diminishes native plant communities and any forage sustainability and sustainable use. This is necessary to determine current carrying capacity, and to be factored into the suitability of continued grazing of these lands. For example, if lands are all cheatgrass or have greatly depleted understories– there is no sustainable level of use. Targeting those lands for restoration would require long-term removal of livestock - especially in order to protect the public's investment. This all should be examined in terms of suitability. Land areas dominated by large areas that are too steep, or too depleted can not be considered “suitable” for continued grazing disturbance. If there are lands not yet invaded in large amounts by cheatgrass, but that are highly vulnerable/at risk to cheatgrass invasions with continued grazing disturbance, climate change and grazing disturbance, etc. – then these areas too should be found to be unsuitable.

Roading, and Fragmentation. The Forest refused to examine the relationship between many of the minor and other roads here and livestock grazing activities in its Travel Plan process. So this EIS is where such analysis should be conducted, and roads identified for closing and rehab in areas where they are redundant, where ranching activities could be conducted on foot or horseback, where facilities are causing damage. Such roads and facilities that spawned them should be identified under a range of alternatives here for removal. Accompanying ecological restoration and removal of roading associated with these facilities must be examined here as well. This would provide greater security to grouse, enhance LCT and other watersheds, improve water quality and stream connectivity, and speed recovery of watersheds and viable metapopulations of LCT, as required under the LCT recovery plan. Please provide detailed mapping and analysis that presents varying alternatives here.

It appears that the Forest tries to preset the illusion there are more permittees in the EIS area than there really are. Please clearly identify where ALL 17 permittees graze. How many are grazing on the Quinn River area, associated with Ft. McDermitt permittees, etc.? Also, please provide detailed analysis and explanation of any sub-leasing or other actions that may be occurring.

The Forest also states:

“Current and prospective term grazing permittees desire to continue grazing in the project area and have invested substantially in base properties, livestock handling facilities, and range improvements. [Please provide all of the dollar values here] National Forest System lands provide an important source of their livestock forage during parts of the year. [Please provide detailed facts, figures, on all aspects of the livestock operation]. For these permittees, ranching provides an economic value, and grazing on National Forest System lands contributes to this economic value.

“The purpose and need for the proposed federal action is to contribute continued social and economic value to grazing permittees in a way that sustains the health of the land”. Whoa! This is NOT what NFMA requires, or what the Scoping for this project said – the scoping must be re-initiated]. Also *“In considering this request for continued grazing, we, as land managers, understand that the ultimate driving force, the purpose, if you would, for the harvest of forage by livestock is a desire for economic value infused in many cases with a deeply held cultural identity. We also understand that these benefits accrue primarily to the individual permittees.*

The second part of our proposed action involves the modification of the conditions attached to the permit to graze on National Forest System lands. Our scientific understanding of the impacts of grazing has evolved, and we need to incorporate this knowledge into our grazing management system. We are modifying these terms and conditions to incorporate the latest science on grazing ... ”. [If the latter statement is true, why in the world is much of the EIS range analysis based on Crider’s greenhouse and the Dietz Stockmen pamphlet and attempts to ignore, minimize or discount the scientific literature on the adverse effects of grazing disturbance under the proposed action on arid shrubsteppe ecosystems?????].

This whole approach and what can only be seen as obsequious pandering to a tiny number of ranchers/industry, violates NFMA, NEPA’s science and “hard look” requirements, and the current Forest Plan. The EIS wrongfully places overwhelming emphasis on private cattle industry interests at the expense of all other values of these lands. All credible current science for arid lands shows the adverse effects of cattle grazing disturbance. A Rangeland EIS must be driven by a Purpose and Need that aims at protecting the public interest, retaining and restoring habitats, sustaining and recovering viable populations of native biota, and intact and healthy lands. THEN decide where (if anywhere) cattle grazing disturbance may be the least damaging.

What percentage of the Winnemucca area economy does grazing in this area represent? A hundred thousandth of the \$\$\$ associated with other activities?

The EIS mentions “prospective permittees”. Who are these permittees? Has anyone approached the Forest? Who? To graze where? It appears from info elsewhere in the EIS that the Forest plans to allow permittees that have s beat out their lands that higher

standards are required - to graze in the vacant allotments or canceled permit areas – Rebel Creek, Bradshaw, Buttermilk. This rewards failure, and places primacy on private over public interests. It also illustrates how the Proposed Action is likely to promote impairment of lands and waters. The Forest seems to think the solution to pollution is to expand the impacted area.

Climate Change – Desertification and Global Warming Effects on Martin Basin, and Martin Basin Effects on these Processes

The EIS largely ignores any analysis of climate change effects, and how livestock grazing disturbance exacerbates climate change effects, as well as contributes to global warming. The Forest fails to weave any consideration of this into Capability and Suitability analyses.

The Forest states: The Resources Planning Act April 2007 update (Interim Update of the 2000 Renewable Resources Planning Act Assessment, Publication #FS-874) acknowledges and addresses climate change. It also indicates that climate variability makes predictions about drought, rainfall, and temperature extremes highly uncertain. Based on the best available science, it would be too remote and speculative to factor any specific ecological trends or substantial changes in climate into the analysis of environmental impacts of this project. Research about long-range shifts in species range, etc. is ongoing, and a number of groups are discussing the implications of climate change on forest and range management. Although there is a solid consensus that global warming is occurring, there is still much uncertainty about subsequent ecological interactions and trends at the local or site-specific scale. Given the stochastic nature of climate-related events such as droughts, wildfire, and floods, it would be highly remote and speculative to make management decisions based on such predictions. The best available science concerning climate change is not yet adequate to support reliable predictions about ecological interactions and trends at the local (site-specific) scale. Project-scale effects will not make individual contributions to greenhouse gas emissions that are significant enough to measure”.

This is absurd of course. The effects are measurable – it is just that the Forest chooses to ignore use and consideration of science, and the symptoms of desertification readily apparent on the chronically grazed and dying springs, depauperate upland. It fails to examine how much livestock grazing and trampling disturbance reduces the ability of these lands to naturally sequester carbon. It fails to examine how climate change will exacerbate the effects of grazing disturbance on plant and animal habitats, and populations.

The FS focuses instead on pandering to industry by inflating its supposed economic and social importance. The Forest can measure erosion, water loss, changes in plant communities that contribute to desertification, which is part of climate change. See CEQ 1981 Sheridan, Steinfeld et al. 2006, and that feed in global warming. It can measure the methane emissions from livestock, and determine that amount. It can measure the loss

and reduction of the land in its ability to sequester carbon, or at a minimum make reasonable estimates. It can manage these lands under the precautionary principle – and make reasonable efforts to minimize negative effects of livestock so that climate change effects are buffered. It can remove livestock stressors on water limited watersheds – so the public uses, wildlife and fisheries suffer reduced impacts as climate change occurs. But of course, since the Forest has not conducted necessary lentic surveys, or examined which springs and meadows may dry out altogether with continued or even increased grazing disturbance under the proposed action, the Forest just throws up its hands and walks away.

The Forest emphasizes droughts, fire, and floods - and ignores how cattle grazing disturbance promotes these events, as well as ignoring how climate change will amplify these effects. And it ignores how these may be a symptom of climate change, as well. The Forest’s approach defies current science. Of droughts, early and rapid runoff, or wild swings in weather are predicted to increase, then the Forest should act to reduce or altogether remove livestock disturbance.

Cattle desertify lands, which promotes site warming and feeds into global warming processes. See Sheridan CEQ 1981, Steinfeld et al. 2006.

Restoration Is Forsaken

The Forest has provided only minimal rest to lands burned in wildfires, and it has not undertaken restoration actions, except at times for a brief period immediately following fire.

The Forest must consider much longer periods of rest, or closing lands permanently following fire, to promote recovery of ecological processes and sustained water, soils, veg and native species. Why is this not considered as part of a Grazing EIS? Current science demonstrates very long recovery terms for sagebrush communities – and climate change is likely to exacerbate recovery. Disturbance of livestock trampling and vegetation effects hinders post-fire recovery and removes essential cooling cover and habitat for wildlife and watersheds that have suffered fire effects. Fire removes cover, and results in a hotter, drier site. So does livestock grazing. Both combined after only minimal rest are devastating.

It is no wonder that cheatgrass is present in many burned areas – agencies simply will not rest lands from disturbance to allow microbiotic crusts, soil and veg recovery. A range of post-fire or post-“treatment” rest periods must be examined.

As part of this process, we request the Forest examine a range of significant active and passive restoration actions to recover sagebrush communities.

The Forest has conducted a series of “Fuels” projects to kill woody vegetation like Ranger Noriega’s large-scale prescribed burns, sagebrush mowing and other harmful and habitat fragmenting projects have made sites hotter and drier, and altered pygmy rabbit, brewer’s sparrow and sage-grouse habitats.

Increased site temperatures, more rapid site drying, with continued grazing. This contributes to global warming. How much more will grazing large herds of livestock here promote these processes?

How much methane does each cow produce? How long is it on the land? How does this methane promote global warming? How much does annual removal of “forage” promote by livestock prevent

Forest Omits Key Protective Terms and Conditions

The Forest Service proposes to modify the terms and conditions included in grazing permits issued in the project area. It states: “These modifications are based on our assessments of the current ecological conditions within the allotments”. The Forest never explains that it is gutting a key protective measure of Amendment 2, i.e. the current triggers that require livestock to be moved from pastures when standards are met.

The real resistance of the industry seems to be to a trigger to move livestock. Please provide full and detailed analysis of all the times triggers for livestock movement have been exceeded over the past 20 years, and describe in detail whether livestock were moved, or if they were allowed to remain.

The Forest must include a wide range of alternatives with varying levels of conservative use triggers, instead of loose and open-ended “adaptive Management”.

If the Forest indeed is going to be basing any grazing decisions on current science, then both the upland and riparian standards it proposes are very excessive and a greatly revised DEIS with new more conservative standards must be prepared. This the case in the context of the greatly damaged and fragile meadow, spring, seep and stream areas. The uplands are greatly vulnerable to cheatgrass and other weed expansion – with continued cattle disturbance to soils and microbiotic crusts. The Forest provides no measurable standards of use to limit livestock trampling – known to be a cause of weed expansion the sagebrush biome. See USDI BLM Technical Bulletin Belnap et al. (2001). The upland utilization standards do not provide adequate residual native bunch grass cover for sage-grouse to and other birds to successfully nest . Nine inched of residual standing grass cover is essential for sage-grouse nesting. Increased bunchgrasses in interspaces and forbs as well are essential for sage-grouse. The FS provides no measurements or limits on cattle structural alteration, breakage, and consumption of

sagebrush. Dense sagebrush and structurally complex is critical to the pygmy rabbit, especially in this landscape where the Forest has killed and thinned thicker patches of sagebrush in “Fuels” projects – the real aim of which was to eke out a few more blades of grass for the tiny number of well-connected permittees that graze here.

Not only has the Forest contrived a “purpose and need” laden with bias, it appears to have responded only to permittee comments in Scoping, and not to other public comments. Why do you only have standard rancher whining in “Other Considerations”?
This demonstrates more bias of the Forest in this inadequate EIS process.

Please provide full and detailed data and analysis for the past 20 years of all upland monitoring data, and mapping and other info and analysis of locations where it was collected. What systematic and scientific methodology was used to determine monitoring sites?

Who wrote the nauseating text about ranching identity, and other fauning text? Where is the OTHER side of the story – everything from ranchers killing Native Americans to cattle ranchers killing sheepherders, to the cruelty of barbed wire, to the relentless war on predators, and other negative aspects of ranching in the West? Have consultants/industry been involved in writing this?

Maintain rangelands that are currently in satisfactory ecological condition.

•

Improve rangelands that are in less than satisfactory ecological condition.

•

Strengthen the noxious weed control effort.

•

Provide sustainable yield of forage for livestock production.

“The proposed action responds to these Forest Plan elements by reducing the maximum allowable utilization on allotments within the project area from 65 to 50 percent for upland areas and from 70 to 45 percent for riparian areas”.

The FS has not defined what specifically it means by riparian area and how it is defined. It does not identify which specific drainages and which springs have which Forest plan standards applied. For example, almost NO streams have a 70% utilization standard. (Fite WLD from past review of HT Forest mapping. In order to understand whether this, or any other standards, will have a beneficial effects, there must be careful hard look site-

specific analysis of current ecological conditions based on actual current data, and whether the level of protection is sufficient under Amendment 2, i.e. sufficiently reflective of and providing sufficient protection under Amendment 2. This is needed to determine the baseline and current compliance with the Forest standards and Plan. It is also crucial to understand just how harmful and LESS protective the minimal “standards” will be. This broad-brush axing of Amendment 2 appears to be a way to avoid the actual hard work of systematically collecting current data across all riparian areas and meadows. – especially given great lack of existing current monitoring data found in the EA and reports. We Object to all these deficiencies.

We Object to the FS failing to clearly specify what plants these standards will be measured on, and how percent utilization of different riparian herbaceous vegetation equates to a measly and grossly inadequate 4 inch stubble height.

The FS must provide how stubble height for the grasses, sedge, rushes, forbs in the SRRD equates to utilization percentages. We Object to the lack of data.

Jarbidge BLM documents show:

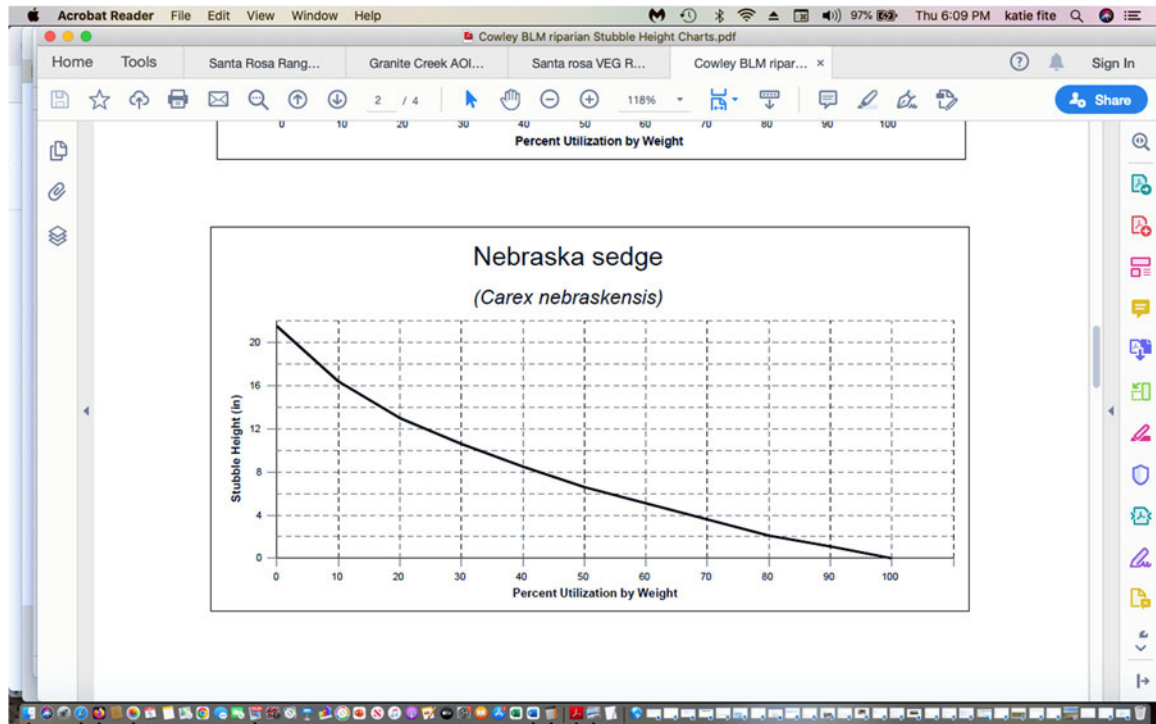
Stubble Height Related to Percentage Utilization

BLM’s own information provided to the public in the Jarbidge BLM RCI Grazing EA illustrates how greatly inadequate BLM’s utilization cap is in providing 7-9 inches of residual nesting cover. See Ch 4 Pg. 89 of USDI BLM Jarbidge Field Office “Issuing Grazing Permits and Forage Allocations” (ID-097-03-040) utilization and stubble height comparison. The data for the same native grasses as are found in the project area is summarized as follows:

- 50% utilization of bluebunch wheatgrass (of ungrazed height of 19”) results in only 4” of stubble height remaining. 40% = 4”.
- 50% utilization of Idaho fescue results in only 1.7” of stubble height remaining. 40% = 1.8”.
- 50% utilization of Thurber’s needlegrass results in only 2.5” of stubble height remaining. 40% = 3.5”.
- 50% utilization of bottlebrush squirreltail results in only 1” of stubble height remaining. 40% = 1.5”. 40% = 1.5”.
- 50% utilization of Sandberg bluegrass results in only 1.5” of stubble height remaining. 40% = 2.2”.
- 50-60% utilization of crested wheatgrass results in only 2.7” of stubble height remaining.

Riapiarian – See Cowley:

A 4 inch stubble height reflects as high as 65-70% utilization of Nebraska sedge.



Stubble Height Based on Height-Weight Curves for Nine Key Riparian Graminoids

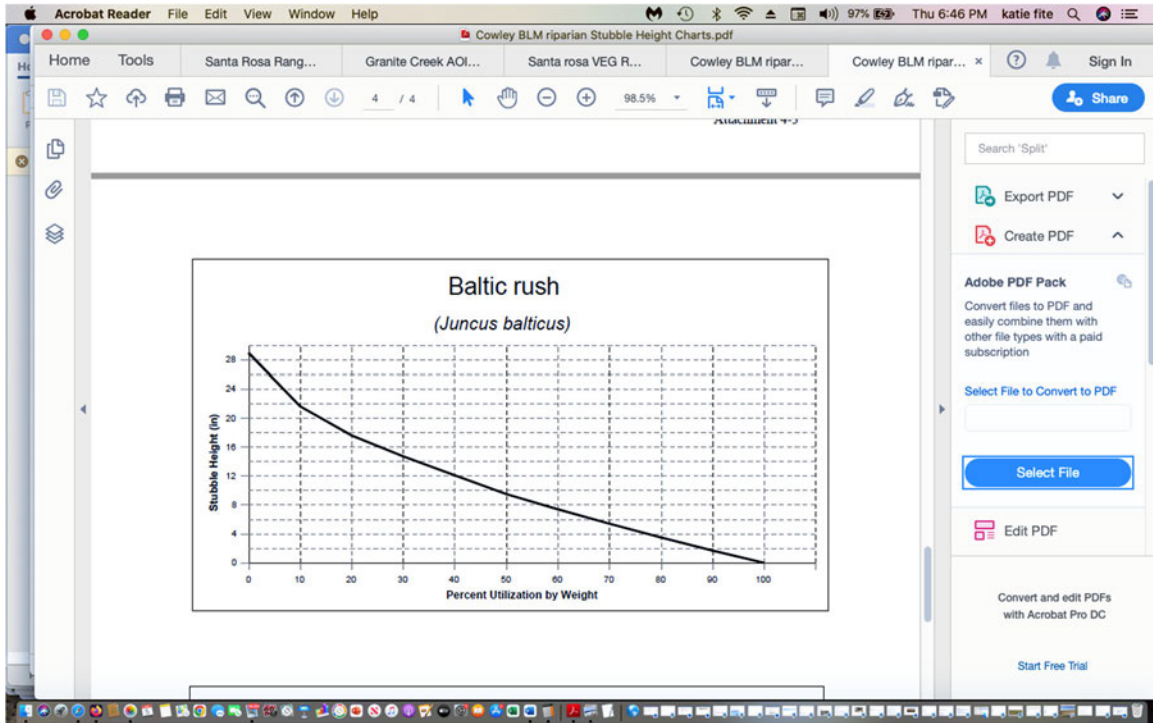
by Ervin R. Cowley

March, 1999

Stubble height may be used in lieu of utilization on riparian areas that are not associated with streambanks. This may include wet meadows, springs, seeps, and floodplains. Prescribed Grazing, the approved Idaho Component Practice, provides that "Herbaceous hydrophytic vegetation will not be grazed more than 50% by weight during the growing season, or 60% in the dormant season unless permitted by specialized grazing systems" (NRCS, ID, February, 1999) The follow charts were developed to provide some guidelines for stubble height on nine key riparian plant species. Although these curves are not precise, they give a reasonable estimate of stubble height for these nine key riparian species.

A Photographic Utilization Guide for Key Riparian Graminoids, by John W. Kinney and Warren P. Clary was used to develop the charts. The mean plant height, including seed culms, was multiplied by the percent of height remaining to determine the stubble height for each of the 10 percent increments removed. This was then plotted on a new graph with inches of stubble height on one axis and percent utilization (percent weight removed) on the other axis. For example, Nebraska sedge had a mean height of 54 cm or about 21 ¼ inches. At 10 percent of the weight removed, about 61 percent or 16.4 inches of the plant's height remained. This procedure was repeated for 10 percent increments to 100 percent. These values were placed in a table and the curve developed. This procedure was repeated for all nine plant species.

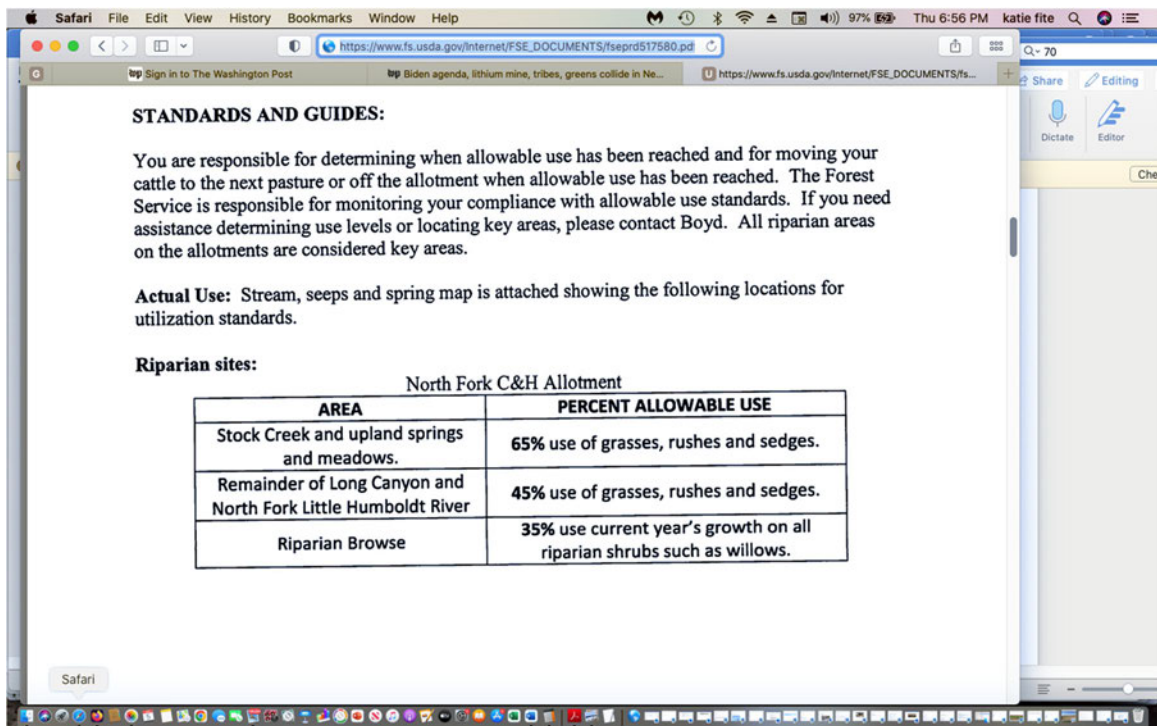
A 4 inch stubble height on Baltic rush, a very common riparian species, and often itself an indicator of excessive grazing pressure and loss of wetted potential and altered grazing and trampling caused stress on riparian areas is 75%. We Object to the failure of the FS to objectively assess just how much worse conditions will be with the proposed SRRD gutting of Amendment 2.



For example this AOI from 2016, (we can NOT find any current map of SRRD stream categories under Amendment 2, and one muse be provided for any valid NEPA analysis.

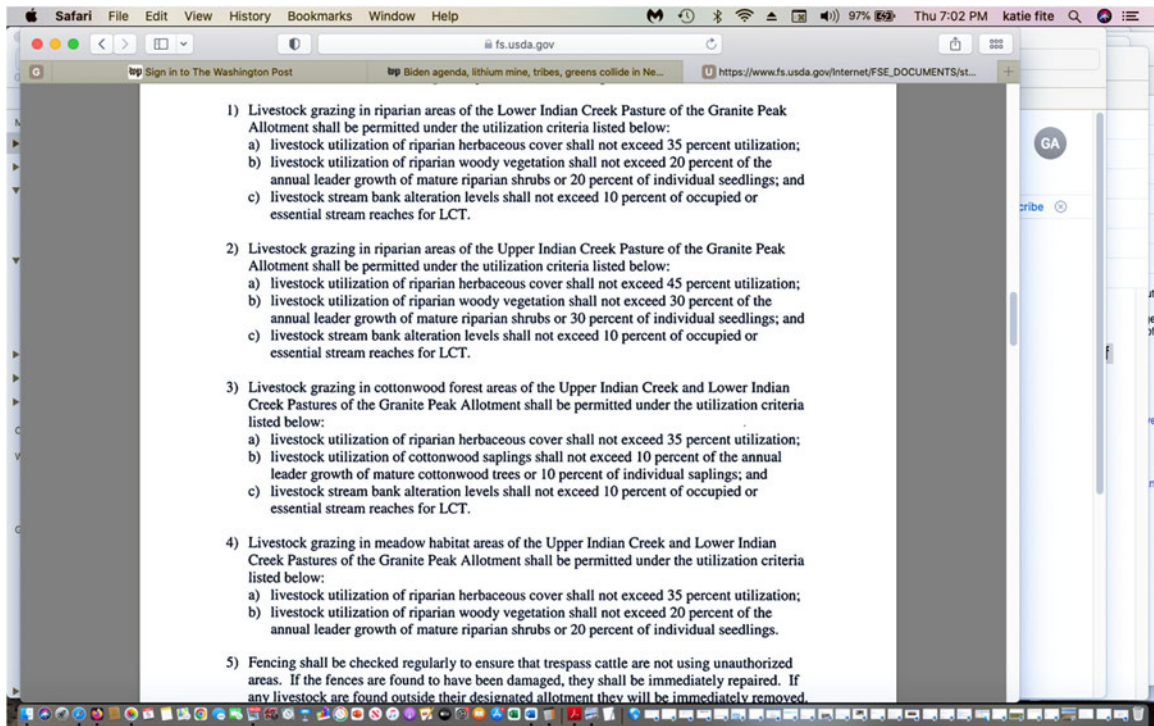
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd517580.pdf

North Fork Cattle and Horse allotment.



https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3843753.pdf

Granite Peak



Review of the documents results in considerable confusion:

Veg report p. 1:

Set 4-inch annual average residual (amount of current year's growth left after the end of the grazing season) stubble height (hereafter referred to as stubble height), specific to grass in all wetlands, riparian areas, greenline areas, and wet meadows

p. 13 of BA states: "Set annual utilization at 45% for all wetlands, riparian areas, areas along greenline, and wet meadows, including Great Basin wildrye.

vs. Veg and sops report:

Final Draft EA p. 4 states:

"Set 4-inch annual average residual (amount of current year's growth left after the end of the grazing season) stubble height (hereafter referred to as stubble height), specific to grass in all wetlands, riparian areas, greenline areas, and wet meadows". also sources appear to refer to no herbaceous riparian stubble height set for non-grass species, or even sedges and rushes under this strange language.

It is simply impossible to accurately comment on, or for agencies to undertake a hard look impacts assessment , or to adequately conduct ESA consultation on these ever-shifting statements, and impossible to determine stocking rates, determine compliance with NFMA and sensitive species policy given lack of clarity, and the lack of current

data, and the incredibly poor mapping that the FS is trying to use to gut amendment 2, gut the springs amendment, reduce current ESA protections in order to increase cattle stocking and damage to Wilderness, GRSG and PR and migratory bird habitats, watersheds, LCT and other fish-bearing streams and high value public use and enjoyment lands, as well as highly significant cultural sites.

We Object to the lack of the history of monitoring data (and also mapping accurately showing locations, or even any data associated with pasture locations associated with each data site for riparian and upland data used in this process. This is necessary to determine the effects of the existing stocking rates and the existing seasons of use, existing rest-rotation, existing deferment, existing levels of flexibility, etc. on affecting riparian and upland conditions and habitats and populations of important and sensitive species. It is also necessary to understand and form a reasonable basis for any changed stocking, and to understand if XXX

We Object to the XXX

We Object to the failure to take a hard careful look at the adequacy or inadequacy _of monitoring sites. WLD's experience is that agencies overwhelmingly make concessions to livestock interests in selecting monitoring sites. We Object to the failure to show each existing monitoring site, and each new or altered monitoring site of this horrible proposed action goes forward. This is essential to determine the adequacy of any of the very limited existing current data that the FS tries to sneak this action through on.

Further, a 4 inch stubble height would actually be equivalent to 50-70% "utilization" on some herbaceous riparian species.

The martin FEIS stated:

Maintaining ranges in stable condition has been recommended as one of the best management strategies for keeping ranges in good or excellent (functioning) condition (Holechek et al. 1998). This alternative would limit maximum forage utilization to a moderate rate. Moderate grazing has been defined as "a degree of herbage utilization that allows the palatable species to maintain themselves but usually does not permit them to improve in herbage producing ability" (Holecheck et al. 1998, Holechek 2004) and would allow a range in good or excellent condition to maintain or slightly improve. Moderate grazing is generally up to 45 to 50 percent use of forage (Holecheck et al. 2004, Platts

1985). Vavra et al. (1999) summarizes that conservative livestock grazing appears to be sustainable over the long term”.

These levels will not provide 9 inches of residual cover necessary for sage grouse nesting. Gregg et al, 1994, Connelly et al. 2004. The range literature cited does not provide for necessary habitat components to sustain native wildlife like sage-grouse. Plus, the Forest ignores aspects of the range lit as well. In its very limited discussion of current conditions in relation to sage-grouse, the Forest makes claims of habitat conditions based on sagebrush presence, and not understory conditions – including both necessary ground cover of native grasses and forbs, and 9” of residual cover height

Where is all data, analysis, detailed mapping based on current ecological vegetation condition (including analysis of vulnerability to cheatgrass or other weed expansion with continued grazing disturbance? Why is the Forest obsessing over noxious weeds when cheatgrass and other non-noxious weeds are a much greater threat to biodiversity of the sagebrush biome?

The EIS states:

1 For additional detail on the Forest level review, refer to the following documents in the project record: (1) Summary of Capability/Suitability for Livestock Grazing and MIS Analysis Associated with 36 CFR 219.20 during Humboldt Forest Planning Effort (2008), and (2) Management Indicator Species (MIS) and Range Suitability/Capability Analysis-Humboldt National Forest Updated MIS Monitoring Report (2008).

2 For additional detail on the project level review, refer to the Martin Basin Rangeland Management Project Management Indicator Species and Rangeland Capability Report (2008) in the project record.

These documents should have been provided as appendices for full review as part of the DEIS, and their content used and described in discussion baseline conditions, evaluating alternatives, and alternatives analysis. Failure to do so thwarts knowledgeable commenting.

The Forest claims that:

“The Forest level review looked at information in the Forest Plan, the Final Environmental Impact Statement (FEIS) for the Forest Plan, and the Analysis of the Management Situation. The Forest level review also involved modeling rangeland capability using current information and definitions1. The Forest level modeling reflects that all of the allotments in the project area have rangelands capable of producing forage for domestic grazing. [This was so old and outdated that it applied 50 lbs. per acre, which is no longer used by the Forest. Unfortunately, the Forest continues to provide mapping and confusing statements that do not clearly differentiate old early 1980s Plan mapping vs. the Region 4 standards that include 200 lbs, per acre of forage production being required. The OLD numbers were the basis for the forage allocation and sticking

rated/permitted AUMs. Now under the new analysis, at a minimum, livestock numbers should be much reduced, since 200 lbs, per acre, not 50, is now used. If we are not correct here, please then describe in great detail how permitted AUMs were established, including during “conversion” from sheep to cattle.

“The project level review evaluated rangeland capability and suitability for the project area on a more site-specific basis. The project level review validated the Forest level review's determination that all allotments in the project area contain rangelands capable of providing forage for domestic grazing”.

Well, what does this sentence really say? Yes, there are allotments with little patches of ‘capable’ areas on less steep lands so maybe all allotments do have a bit of “capable” land. But how much of the land area of each allotments IS capable under the 200 lbs./acre figure and other parts of Region 4 protocol? How many AUMs are produced in the Capable lands? If Capable areas are separated, what are effects of use on non-capable lands? If capable lands are strung along narrow riparian corridors ad hilltops, and separated by large areas of steeper, rugged or unproductive terrain, then this means that livestock disturb non-capable lands to make sue of the allotment. Please describe in detail how all of this is factored into the stocking rate, and analysis of sustainable use.

This does not provide the public with information that informs understanding of how both capability and suitability was determined. Is there one acre in the Rebel Creek) or any other allotment) or 10,000 acres capable? Are the capable lands located in proximity to one another? How scattered are they? How many acres (and where) of land that is not capable must a cow pass through to get from alluvial fan areas to a hand full of beat-to-death meadows at higher elevations? What are the impacts of movement across and through lands not capable of withstanding grazing disturbance (even under the Forest’s model)? How does this affect ESA watersheds, sensitive sage-grouse habitats, Wilderness values, or roadless lands?

Suitability Analysis Appears Pre-Determined, Ignores Important Values, and Current Science of Risk of Continued Grazing Disturbance

NEW CAPABILITY, SUITABILITY AND SUSTAINABILITY ANALYSES MUST BE CONDUCTED TAKING INOT ACCOUNT CHEAT/WEED SPREAD AND DOMINANCE CLIMATE STREE ON UPLAND AND RIPARIAN AREA AND HABITATS AND STRESSES ON AND THREATS TO NATIVE BIOTA. The Forest Suitability process rubberstamped the status quo. The Forest has largely ignored consideration of current ecological science related to livestock disturbance effects on microbiotic crusts, watershed processes, sage grouse and pygmy rabbit habitat conditions and population needs, aquatic conflicts in LCT inhabited or metapopulation recovery areas, the degree and severity of current degradation, decline and losses in water quantity/flows, effects of water developments in disrupting ecological processes, etc. in arriving at any suitability determination here.

We cannot tell you how disappointed we are in the shallow, cursory and vapid analysis of the Martin Basin DEIS AND LACK OF NEARLY ANY INFO OTHER THAN COW NUMBERS IN THE 2020 NOPA. This document is greatly inadequate, and makes a mockery of NFMA, NEPA, the ESA and Forest policies for important and sensitive species – including the consideration of habitat and population needs in a capability and suitability process.

The EIS ignores the major issues of INVASIVE SPECIES, WATER QUANTITY, microbiotic crusts and their critical role in ecosystems from fixing nitrogen to stabilizing soil surfaces and preventing erosion to serving as first-line defense against cheatgrass and other invasive species.

The Forest wrongly limits its “economic” considerations to making unsubstantiated claims about ranching. There is no analysis of the costs of other public values/resources/attributes caused by grazing activity. These harms include soil erosion, wildlife species reduced or loss, costs of restoration, administrative costs). There is no analysis of costs to outdoor equipment vendors, gas stations, hotels in Winnemucca, etc. of the loss of recreational values sought by the public on these lands – due to adverse effects of livestock grazing.

The Forest has greatly ignored the importance of these lands for many other important and sensitive species and also ignore the costs of restoration of habitats for populations ignored or adversely affected by grazing disturbances. These species include pygmy rabbit, Brewer’s sparrow, loggerhead shrike, mule deer, antelope, bighorn sheep and other aquatic species, as well.

Important “Issues” are properly laid out in Chapter 2. The Forest has omitted serious concerns identified in comments and also the preceding EIS process.

Where is all the monitoring data for springs and seeps? Where are all springs and seeps – including springs and seeps not limited in the EIS or any Table? What is the condition of all of these?

What changes in flow rates, size of wet meadows, etc. have occurred at these areas? How many springs and seeps are developed? How has development adversely affected their conditions? As part of this EIS please conduct full and detailed analysis of restoration needed for all springs and seeps that have been developed. In fact, this should be part of the No Grazing Alternative. Where are these developments? How have perennial flows been lost or altered by developments?

Alternatives THE FOREST MUST ANALYZE A BROAD RANGE OF

ALTERNATIVES IN THE 2020 PROCESS.

The Forest has examined a greatly inadequate range of alternatives. It has also failed to adequately analyze, including through detailed current ecological science, science related to the effects of livestock in promoting global warming, weeds, soil erosion, loss of native vegetation, losses and reductions of important of habitats and populations of MIS, important and sensitive species.

By the Forest's own analysis, Alts. 1 and 2 are similar in many ways. Both continue status quo "paper cow" stocking – by carrying along large numbers of AUMs. Neither of these similar alternatives is supported by ecological science, the real record of actual numbers of livestock grazed annually, or the stark realities of ecological science related to weeds, climate change, microbiotic crusts, soil erosion, and other factors in 2009 in the Santa Rosa region. Frequent reductions (drought, Forest actions related to trespass or resource degradation, etc.), and other closures or alterations in grazing use and stocking rates, are not provided or examined in detail so that the public can understand that BOTH the No Action and the Proposed Action/Preferred Alternative are based on a fantasyland illusion of what the "baseline" of actual stocking and livestock use has been here. This differs substantially from numbers on 10 year permits, or the limited comparative chart in the EISs. All of this information, and the severity of impacts area-by-area caused by cattle use at a particular stocking level, must be analyzed.

This must be overlaid with a reality-based analysis of the degree of existing desertification/reduced production due to shifts in plant community composition/losses of surface and ground waters due to livestock-caused and other erosion, climate change effects, weed expansion risks under continued cattle disturbance, etc.

A range of alternatives that significantly reduce stocking rates, and close important habitat areas, must be developed and analyzed in a supplemental EIS process.

The system the forest sets up will only lead to more tension, violations of use standards (and thus new environmental harm), trespass, and more political arm-twisting by permittees. By failing to be honest about the levels of on-the-ground cuts in AUMs that are needed (including based on the levels of use that have occurred), along with providing alternatives that openly lay this out, the Forest just delays any real action indefinitely.

The EIS slinks around the issue, never addressing how abbreviated use periods might be (and thus reductions in stocking rates) under its alternatives. This needs to be out of the closet so everyone knows the realities of the ecological and management setting.

So not only is there no adequate range of alternatives based on actual livestock use and the effects it caused, there is no range of stocking based on grazing capable lands. The limited alternatives, as written, do not integrate data and analysis on stocking, must be

We stress that critical information on actual stocking and use levels that have occurred is not examined in the BA/BE/BO, MIS/sensitive or other reports. Yet is critical in conducting such analyses adequately. For example, if a biologist finds things will likely be ok with continued grazing use in an allotment, yet does not factor in that the allotment or pasture has been grazed by only half or less of the permitted cattle on the average over the years, and so recovery has been claimed, then an understanding of the role of low numbers of livestock in bring about any recovery must be examined – in order to understand the effects of alternatives including the Proposed Action that would impose continued sky-high and unsustainable stocking on these lands. It is critical to understand the number of animals grazed to even begin to understand sustainability. Without doing this, any analysis will be plagued with greater and unacceptable uncertainty. It is also necessary to understand the effects of having double the number of cattle out in sage-grouse habitats during periods when sage-grouse may be nesting, or large herds using limited springs and seeps for brood rearing. How much MORE disturbance to wildlife and their habitats would result from stocking up to the maximum “permitted” use on all lands here? How might even the physical disturbance and displacement of wildlife, increased flushing, nest and burrow trampling, removal of protective nesting and other cover rapidly if cattle are grazed in large numbers or herded through an area, the increased losses of protective screening cover from cattle use and breakage combined with use levels and numbers of cattle actually grazed affect sage-grouse, migratory birds, small mammals, aquatic species habitats? Vulnerability to predators? Viability of populations? Loss of young/reduced recruitment? etc.

Restoration Alternative

The Forest cast aside any analysis of passive and other restoration actions as the basis of alternatives.

It claims: ”A “Restoration Alternative” was developed for the 2005 FEIS for the Martin Basin Rangeland Project in response to the scoping process recommendation for significant reductions in livestock numbers
26 Martin Basin Rangeland Project Chapter 2: Alternatives Martin Basin Rangeland Project 27

and reliance on non-structural methods of livestock control and dispersion. Passive restoration techniques such as cessations in livestock use and closure of roads were also suggested. The Restoration Alternative was not analyzed through that document and is not being considered in this EIS for the following reasons:

The suggested Restoration Alternative partially duplicates the pertinent features of Alternative 3 (No Grazing/No Action)”.

This is not true, Restoration includes removing projects and both active and passive measures. For example, removing spring-gutting projects, and fencing. As we never expect the Forest to (yet) get rid of all livestock disturbance, but it must minimize damage and casting aside active and passive restoration like removal of particularly harmful facilities or keeping significant areas of high resource conflicts, or where grazing is not sustainable, free of livestock disturbance MUST be examined using best available science (not the Stockmen’s pamphlet) in a range of alternatives. It may include grazing disturbance in some areas where conflicts were minimal. If anything, the Forest’s whole approach to grazing duplicates the status quo – stocking rate/allocation. The 2 alternatives are really very similar - even the same number of cattle would continue indefinitely—only the proposed action strips triggers and accountability.

Is the Forest admitting here that to undertake restoration in a true sense, lands will need to have no grazing? Perhaps the Forest is well aware of all the science it fails to provide in support of No Grazing.

This avoidance does not get the Forest off the hook for analyzing a range of alternatives with significantly reduced grazing – and closure/removal of cattle from areas with higher conflicts and/or to provide scientific reference areas, and removal of many harmful facilities. We suggest such areas as sage-grouse and pygmy rabbit habitats, allotments with limited capable and – grazing lands where large areas of incapable lands must be traversed by livestock, or where use is confined to narrow patches. This creates inherent conflict by imposing grazing disturbance on lands that the Forest’s own standards find not capable of having livestock use.

As part of this process, the Forest must consider re-aligning, removing and otherwise altering fenced areas – including both allotment and pasture boundaries. This is needed for both restoration and wildlife population viability. Where does fencing impose on sage-grouse breeding and nesting habitats – making it likely that sage-grouse may collide with fences? Please identify these areas, and target the fencing for removal. This is also compatible with removing grazing from important habitat areas, areas where significant amounts of non-capable lands would be disturbed. Also removed by re-alignment should be pasture/allotment or broader areas of landscapes where the sustainably “capable” grazable lands are limited in rugged steep landscapes - and thus the same drainage areas receive intensive disturbance year after year.

No Action

Here the Forest also claims the No Grazing Alternative is “analyzed in Full”. No – it is not. The Forest continues to relay on aberrant out-dated cattle industry myths for understanding grazing use effects on vegetation and other natural values of the public lands, ignores a broad body of current ecological science about the benefits of No Grazing, reference areas, restoration, etc. It, ignores climate change science, ignores analysis of the effects/conflicts of livestock grazing vast areas of non-capable lands in order to access small portions considered “capable” under its analysis. It provides no basis for understanding all the effects of grazing at present, or how beneficial NO Grazing would be.

The Forest must analyze a range of restoration alternatives and alternatives based on stocking lands based on their capability and thresholds of incapable lands, as well as under a variety of Suitability criteria.

Roads

The Forest claims that Analysis of potential road closures is outside the scope of this analysis as stated in the “Purpose of and Need for Action”. WWP stresses that during the Travel Plan process, the Forest refused to consider the role of livestock projects and management in causing roading on these lands. Plus it refuses to examine the effects of cattle management intrusions and activities on roadless lands. The Forest again refuses to analyze roading and cattle management and facility effects, and to analyze removal of roads that may be impairing wildlife habitat. Roads may be, or unnecessary, or leading to/linked to damage associated with livestock facilities. With restoration alternatives, roads leading to facilities targeted for removal may be unneeded.

DEIS Table 7 attempts to make comparisons between Alternatives. Until the Forest fully integrates current ecological science (ranging from climate change/global warming to microbiotic crust info) into this analysis, its rosy predictions of improvement under Alt. 2 can not be substantiated.

Unless the Forest fully integrates analysis of capability, and grazing of lands that are not capable, into alternatives and the environmental effects evaluation, it can not make any predictions of “improvement” under a continued high stocking - or any - allocation.

How will cherry-picking limited sites affect monitoring results, and claims of improvement?

The Forest has not provided actual use, pasture-by-pasture for all years that are available. If stocking has not occurred at permitted levels, then issuing permits based on the permitted levels – and thus allowing stocking in excess of AUMs that have been causing all the damage, will just result in much more damage occurring.

All of these claims of improvement, are not backed by current science. Plus, since the use levels now are triggers for removal, whereas the new permits will not require that livestock be moved, there is much more potential for year-after-year damage to occur, as livestock remain after standards are exceeded.

Water Quantity

The FS skirts the issue of declines in water quantity at natural water sources. How do the number of livestock grazed affect water quantity and quality? How will climate change affect water quality and quantity? How is condition of the land area linked to watershed function? How will grazing lands that are not capable affect water quality and quantity? How do weed infestations – and degraded watersheds – affect water quality and quantity?

We have repeatedly asked the Forest in this EIS to examine the degree and severity of desertification that exists. This also includes losses of surface waters and declines in ground water infiltration. Desertification contributes to global warming and represents localized site condition climate change. Baseline information is critical for understanding the effects of any alternatives, and the effects of existing and foreseeable livestock facilities including water developments.

Facilities

The Forest keeps referencing building more facilities but fails to analyze and detailed info on such facilities, and the need for them. It fails to examine the toll taken on sage-grouse habitats, big game recreational use and enjoyment etc. by existing facilities. It fails to reveal and study in a systematic manner across all facility sites – the role of facilities in promoting weed infestations –including cheatgrass and weedy mustards.

The DEIS states that **no surveys for microbiotic or vesicular crusts exist in the Martin Basin Rangeland Project Area.** The Forest can not even begin to understand and take the required NEPA “hard look” at the deteriorated condition of the lands, develop complicated Matrices, or determine what use levels or what stocking rates to apply in any pasture or allotment, until it fully examines the current degradation of crusts due to livestock and other disturbance. Crusts are also important in absorbing CO₂, a global warming gas.

Nor can it hope to develop viable alternatives that protect ecosystem function.

EIS Embraces More Rancher Myths --- This Time about Dung, and Forgets About Adverse Impacts of Livestock Waste

The Forest analysis of ecological processes (such as nutrient cycling) is contradicted by all current ecological science for shrubsteppe systems. It further demonstrates that the

EIS is predicated on ranching myths, and a new Draft must be prepared based on current science and that includes a reasonable range of alternatives.

Who is responsible for this EIS drivel that seems to be blend of the Stockmen's pamphlet and an Alan Savory "holistic" grazing promotional? It is inaccurate and NOT applicable to the intermountain West? "Animal grazing behavior influences the distribution of nutrients to various landscape positions and may have an affect on soil microorganisms. Animals may graze in one area and move to another area to rest or drink. Dung and urine may thus be more plentiful in the resting area and around a watering place than in the grazing area resulting in a net transfer of nutrients from the grazed area to the resting and watering areas. Grazing promotes nutrient cycling through the rapid breakdown of organic matter into smaller particles in the system, so organic matter is more readily available for soil microorganisms, such as soil bacteria and fungi. Microorganisms use the organic matter as an energy source and can release nutrients back into the soil for plant uptake, thus, grazing may increase the rate at which nutrients cycle through an ecosystem. It may be argued that if nutrients are not bound up in soil or organic matter, they are more vulnerable to being lost to the system".

This is just not valid for the arid West and shrubsteppe bunchgrass systems. The Forest ignores ecological science, such as Mack and Thompson (1982) that clearly describe the differences between Plains systems and shrubsteppe. See Mack and Thompson (1982, Connelly et al. 2004). The primary effect of cattle dung in shrubsteppe appears to be in promoting weeds! See Belsky and Gelbard (2000).

The native vegetation of shrubsteppe communities does not need big pulses of nitrogen or other dung and urine nutrients. In fact, all cattle waste seems to do is promote exotic invasive species. See Belsky and Gelbard (2000). Weeds thrive in these urine and manure areas. Seeds are transported in livestock waste, mud on hooves, and deposited in cattle dung.

The Forest analysis is not based on shrubsteppe systems – which are very intolerant of grazing disturbance, and that evolved without large herds of hoofed animals. ALL components – the microbiotic crusts, and the bunchgrasses, are damaged by domestic livestock. Cheatgrass and other flammable weeds thrive in livestock disturbed sites and in association with livestock wastes.

Where is an analysis of the amount if waste deposited in surface waters? Washed into surface waters from steep slopes of non-capable lands subjected to grazing disturbance here? What disease organisms are hikers or backpackers, including in the wilderness exposed to? What volumes of waste are deposited? Under all alternatives? How many scarce nutrients are exported in livestock "meat"? Why aren't THESE questions posed and answered?

Springs Shortchanged

Nevada agencies have undertaken a recent planning effort related to Nevada conservation needs. See Nevada Comprehensive Wildlife Conservation Strategy.

“Ecoregions

Great Basin 3,123 springs
Columbia Plateau 814 springs
Mojave 467 springs
Sierra Nevada 2 springs
Total 4,406 springs

Ecological Systems

A012 - Ephemeral springs/springbrooks
A013 - Cold perennial springs/springbrooks
A014 - Thermal (warm) and hot perennial springs/springbrooks

Mapping found in this report depicts springs and springbrooks, including throughout much of the Martin Basin EIS/Santa Rosa Range country. Yet the EIS lacks any significant info on all of the several dozen springs shown.

“The characteristics of individual spring and spring brook systems can vary tremendously in terms of flow, water chemistry and habitats provided for terrestrial and aquatic wildlife species. Many spring systems important to wildlife represent little more than seeps with average flows which cannot be practically measured by conventional means. Even relatively small spring and spring outflows can support important populations of endemic gastropods and aquatic invertebrates”.

Also: “Gains in scientific knowledge about the contribution of spring habitats to biodiversity and the longevity of "ancient" water supply sources has drawn attention to spring conservation and management. Because springs are isolated and have unique environmental characteristics, aquatic and riparian plant, fish, and invertebrate (e.g., springsnail) diversity and endemism tend to be high in these systems.

“The development of springs and seeps, a common historic practice for livestock watering, domestic water supply and other reasons, is a significant concern because of the critical importance of spring resources widely distributed across Nevada’s landscape, as a source of surface water for terrestrial wildlife and also because many springs and seeps of all sizes support unique endemic aquatic biota. The development and modification of spring sources and source pools directly alters or removes important aquatic habitats, modifications can limit access to remaining surface water by wildlife, and the diversion of water away from outflow channels modifies and can reduce or destroy associated riparian and wetland habitat, as well as limiting or eliminating flowing water habitats for springbrook associated endemic species. Although not directly related to the development and alteration of spring systems, groundwater development has been a historic stressor on Nevada wildlife and habitats and continues to represents a significant ongoing

threat”. (Nevada CWCS Strategies).

It is essential that the Rangeland EIS prepare a complete inventory with current data and information on the degree and severity of alteration and loss of springs and seeps that has already occurred, and take significant steps to prevent further losses and restore degraded or threatened areas. The effects of chronic livestock grazing disturbance, livestock developments, pollution and other factors must be examined in detail here, based on site-specific current surveys, and analysis of any historical water surveys on Forest and BLM lands as well. Was there a Water Inventory done here in the 1960s or 1970s? If so, how do current conditions (flows, integrity, other characteristics, number and location of developed vs. undeveloped springs, chemistry, etc.) compare to the present? How can grazing be managed to minimize further deletion and losses?

We are very concerned about the Forest’s attitude toward hydric and mesic areas. For example, Ranger Noriega allowed a pond already altering a natural wetland to be dug deeper – further drain meadow areas. No careful assessment of any kind was conducted, and the project is claimed to be a success. How can further altering a natural area be a success?

No adequate baseline can exist, and no adequate cumulative effects analysis of any kind can be performed until the Forest provides detailed info on all developed and undeveloped springs conducted. The ONLY place where any comprehensive and adequate analysis will be able to be conducted is this EIS process.

An assessment of the ability of all waters to support a variety of uses must also be undertaken. If spring-gutting projects are not removed, how much will wetted areas of meadows and springbrooks continue to be diminished?

This is essential to establish a baseline to understand both the effects of grazing and developments, plus the added stresses from global warming.

ALL of these factors must be carefully assessed in a greatly revised EIS, and they have not been. Also these elements (below) must be examined in the Range using the best available science and current inventories.

NV Conservation Strategy also included:

“Priority Research Needs

- Impacts of groundwater withdrawals on a regional scale
- Groundwater interbasin connections and recharge intervals
- Gastropod adaptability to alterations in water level, water chemistry and other tolerance parameters
- Effective methods for control and removal of invasive and nonnative animal species, particularly in larger regional spring systems where flow and physical characteristics make conventional physical and chemical

control methods impractical

• Effective methods for restoration and reconstruction of fully-functioning spring habitats

Conservation Strategy

Goal: Springs and springbrook habitats functioning naturally within the natural fluctuation inherent to the spring type (recognizing that regional springs are inherently much more stable than those supported by local aquifers).

Objective: A measurable increase in the number of springs and springbrooks functioning naturally and

supporting the natural ecological community expected for each spring by 2015.

Action: Assess the current status of Nevada's springs.

Action: Establish a working group to contribute expertise, pool data, develop and implement a management plan)

Action: Map springs and digitally document their historical condition, desired condition, and restoration potential.

Action: Prioritize management and restoration activities by spring.

Action: Restore degraded springs and associated riparian areas. Identify factors

Action: Restore degraded springs and associated riparian areas. Identify factors affecting site potential and adjust land uses to allow for natural spring and springbrook recovery.

Action: Maintain the ecological structure and function of spring habitats by stabilizing discharge and spring brook morphology.

Action: Manage springs and their riparian areas as a unit using guidelines appropriate to these systems, such as those used to manage wetland areas and riparian zones.

Action: Manage for a minimal standard of proper functioning condition (PFC) for springs and associated riparian areas on public lands, utilizing existing guidance and standards for spring and springbrook ecosystems.

Action: Incorporate standardized biological assessment as an adaptive management feedback mechanism to assess spring management effectiveness.

Action: Work with landowners to maximize appropriate spring habitats, including providing information about optimum habitat, invasive species, and available grant and other funding opportunities.

Action: Establish conservation easements, Safe Harbors Agreements, and Candidate Conservation Agreements

from willing landowners, or acquire key habitats or water rights from willing sellers.

Objective: No net loss of spring/springbrook-dependent Species of Conservation Priority concern.

...

Action: Develop and implement a regional Conservation Agreement and Strategy for isolated spring systems and dependent Species of Conservation Priority including land management partners and adjacent state responsible entities.

Action: Encourage research on innovative methods and strategies for the control and removal of invasive and nuisance animal species from spring and springbrook systems, particularly crayfish and thermally dependent nonnative fishes.

As part of the Martin Basin EIS, a full thorough analysis and development of alternatives incorporating all actions above must be undertaken.

This EIS effort is as close to “landscape assessment” as the Forest will ever come for this area, and all of these critical issues need to be inventoried, current and comprehensive site-specific data collected – and actions undertaken.

EIS Area Was Omitted from Ecoregional Studies: Intensive Look Should Be Taken in this EIS, and Factored into a Suitability Determination, Alternatives development, and NEPA Analysis

TNC conducted an Ecoregional assessment over most of the Great Basin, but unfortunately omitted including the Santa Rosa Range and some neighboring areas. Thus, in order to understand the rare or important community values here, the Forest should undertake analysis of special vegetation and other biotic values as part of this EIS. This is necessary to understand what grazing use at continued high allocations and use levels of the EIS may degrade or destroy. The TNC Great Basin ECOREGION BLUEPRINT (TNC) 2001 describes:

“Human induced activities that impact biodiversity include urbanization, rural sprawl, intensive agriculture, livestock grazing, construction of roads and utility corridors, recreation, mining, military activities, groundwater withdrawals, and stream diversions. Structural and compositional changes to ecological systems include destruction or alteration of habitat, habitat fragmentation, and exotic species introductions, while functional changes to ecological systems include increased fire frequencies and intensities, decreased instream flows and ground water, as well as increased soil erosion and compaction ...”

Unfortunately, riparian and wetland systems in the intermountain west have experienced both huge losses and degradation (Langner and Flather 1994, Noss *et al.* 1995). More than 80% of all BLM managed riparian is in unsatisfactory (functioning at risk or non-functioning) condition and in need of restoration. Thirty to more than 50% of the wetlands in Utah and Nevada, respectively, were lost from the 1780s to the 1980s (Dahl 1990). Associated species, especially bird assemblages, have declined. Among the 134 species of migratory land birds that

regularly breed in the Great Basin, more than half are associated primarily with riparian habitats (Dobkin 1998). Many neotropical migratory birds are declining in the Great Basin as elsewhere (Langner and Flather 1994).

Rangeland use has provided the greatest economic contribution from Great Basin landscapes. Most of the land has been subject to grazing and much of that has been heavy grazing (Horning 1994). Significant impacts from grazing have occurred at springs and seeps, along riparian corridors, and on bottomland meadow vegetation. Grazing impacts that change ecological systems include displacement of plant species, which decreases their areal extent, increases soil erosion, and increases less palatable species. Young *et al.* (1976) in a historic review of pristine and grazed Great Basin plant communities conclude that there are no more pristine Great Basins to graze. Essentially all remaining sagebrush steppe has been affected by livestock, while 30% has been heavily grazed (West 1996). Bird species dependent on sagebrush, such as sage grouse, sage thrasher, and Brewer's sparrow, all have declining population trends (Paige and Ritter 1999). Grazing has impacted rare and endangered species in the Great Basin, such as Lahontan and Bonneville cutthroat trout by decreasing riparian plant cover, which leads to increases in water temperature (Horning 1994). Additionally, several associated grazing activities, including trampling, introduction of diseases carried by livestock, pollution of aquatic systems from fecal material, range improvement projects, and invasion by exotics introduced by livestock, imperil rare species. The spread of noxious weeds is increasing as a result of historic and some current grazing management conducted at inappropriate levels, frequencies, or seasons of use. Cheatgrass, halogeton, and Russian thistle have altered the functioning of Great Basin ecological systems greatly (e.g., by altering natural fire regimes, altering soil chemistry, and ... wildlife habitats". TNC Nachlinger Blueprint

"The Lahontan aquatic ecoregion includes drainages that extend north into the Columbia Plateau and west into the Sierra Nevada ecoregions. The rivers (Walker, Carson Truckee, and Humboldt drainages) originate as high elevation small, clear, swift streams ending in larger, turbid, sluggish rivers evaporating into saline-alkaline basins. The lakes include Mono,

Walker, Pyramid, and Tahoe. Numerous cold and thermal springs and spring complexes are present. Harsh conditions and isolation has resulted in differentiation and endemism of aquatic taxa, especially in fishes (33% endemism), invertebrates, and springsnails. Nine Great Basin EDUs make up this largest of the four aquatic ecoregions. They are the Quinn River, North Humboldt Headwaters, Middle Humboldt River, East Central Great Basin, West Central Great Basin, Carson Desert Basin, Lake Lahontan, Lahontan Western Headwaters, and Honey Lake”.
TNC

The Great Basin team identified 287 ecological communities as occurring in the ecoregion and initially considered them all to be conservation targets. These terrestrial natural plant associations were initially selected from the national vegetation

Unfortunately, the splendid wild lands of the Santa Rosa Range fell through the cracks in this effort. It was not, for some reason, examined by Nachlinger et al. Any ICBEMP analysis did not identify special ecosystems for protection in the same way the TNC Nachlinger effort did. This makes it even more important that the Forest in this effort carefully examine the full range of biological values, and the their local, regional and national importance, and devise management strategies to protect, restore and re-connect must be undertaken. It is also appropriate in this EIS, because the EIS is a more intensive look than will ever be taken in Forest Planning, and this EIS allocates (doesn't it? Please clarify) how much “forage” can be removed, how many livestock hoofs can trample and collapse pygmy rabbit burrows, etc., how many acres are subjected to chronic grazing disturbance. So this is the point where the Forest needs to collect adequate baseline information, including on important, rare, unique communities, watersheds habitats needed to support sustainable and thriving sage-grouse, pygmy rabbit and other wildlife populations, and integrate that into a “suitability” analysis. For example: What values will be negatively affected by continuing to allow water development to stay in place that is promoting cheatgrass invasion of low sagebrush habitats – which are very important for sage-grouse and very difficult or impossible to recover once disturbed?

Special landscapes and important or unique vegetation communities do not follow the pattern of allotment boundaries – Artificial fenced allotment and pasture boundaries are based on straight lines, base property purchases, rancher feuding over the years, etc. In fact, they often bisect or fragment critical sage-grouse habitats, rare plant occurrences, important watersheds, scenic viewsheds, etc.

Miscellaneous

Comparison of Alts EIS S-5: There is no real analysis of the degree of differences/changes in environmental effects between alternatives As we discuss elsewhere, the Forest foundational claims - like changing the upland use to a level still greatly inadequate for sage-grouse or pygmy rabbit or other native species- will affect conditions and wildlife and other values significantly -is not backed up by data. Where, for example, are the use measurements from all years available – what are they and where were they taken? What were the stocking rates by pasture for each year and time that utilization was taken? Where were utilization measurements made? If distant from water, or “averaging” in the less grazed areas – the “averaged” land area typically includes lands that livestock do not use.

Upland use concerns: The very limited number of non-random and cherry-picked study sites typically distant from water or areas of livestock concentration do not reflect the damage being done in areas actually being grazed to a significant degree by livestock. It appears to us – without the Forest having provided systematically and statistically valid monitoring data across uplands – that the Forest is basing claims of improvement on a situation that in reality will not change. We have also repeatedly heard the Forest in the HT acknowledge that upland utilization is typically being met. So changing upland use standards will result in little change on the ground.

There is no evidence that changing upland use levels will provide for sustainable and recovering habitats and populations –especially since the FS proposes to continue to allow use that removes all but 2-4 inches of grass stubble height on native communities (see Forest utilization gauge for Sandberg bluegrass, bluebunch wheatgrass, Idaho fescue to verify. There is no evidence that significant changes will occur. Perhaps that is why the Forest knows that little change, if any would occur across the vast uplands under the No Action or proposed action, and that is why Table S-1 provides no quantitative or firm descriptors for alternatives effects on sediment/turbidity, water temperature, dissolved oxygen, nutrients, ground cover, compaction, erosion, bank stability, fisheries populations, sage grouse nesting habitat, sage grouse brood rearing habitat, riparian-percent bare ground, aspen regen, upland veg composition, upland forest- bare ground, noxious weeds (we again stress that it is scientifically indefensible to not examine exotic invasive species effects as a major issue – especially flammable invasive species like cheatgrass that are widely recognized to profoundly alter vegetation communities, ecosystem processes and habitats and populations of important, MIS and sensitive species.

In Table S-1, the Forest only describes “possible loss of AUMs” –but never shows where, how many, or when. The Forest flawed analyses ignore that it plans to **Open** Vacant allotments to use – so there will really be an INCREASE in grazing use under the proposed action.

Table S-1 Soils claims that levels of soil erosion under No Action “will continue at current rate”. There is no scientific basis for understanding if that is correct (it certainly is not for the Vacant or allotments), or if erosion will accelerate. Exotic species like cheatgrass that are largely ignored in the analysis and where the Forest provides no current site-specific info on occurrence or risk of expansion across the landscape, have shallow roots that increase the susceptibility of lands to erosion. To understand whether erosion rates would stay the same. The Forest must provide much more detailed baseline site-specific studies across the vast uplands and springs, seeps, drainage networks – to understand the CUMULATIVE effects of all the ongoing disturbances. A reader of the EIS is provided little substantive info of any kind to understand conditions across the landscape. The Forest also ignores the effects of drought, desertification, global warming/climate change, etc. all of which are essential in making predictions and analyses of the direct, indirect and cumulative effects of “no action” or other alts – including NO Grazing. We again stress that the baseline is woefully deficient - outside the flat land riparian studies and a hand full of non-systematic cherry-picked upland sites, there is little info that links watersheds, habitats and landscapes together.

Critical baseline info on grazing numbers, use levels, monitoring, etc. is lacking too. The Forest never reveals the number of cattle actually being grazed so that a reader can understand what has actually been occurring on the ground. The FS proposes dragging along all AUMs under this flawed EIS, and opening and allowing large numbers of livestock to use of Vacant allotments and canceled permit areas by cattle herds. The public needs to understand what percentage of the AUMs are actually being grazed. In reality, under No Action dragging along ungrazable AUMs on permits may result in much more damage if ranchers exert political pressures to get all of those AUMS turned out.

These same flaws pervade the analysis of ALL the resources described in S-1 “Comp of Alternatives – Effects of Implementation”. Another example is “bank stability”. Table S-1 claims Alt. effects will be: “below 80, Alt 2 greater than 80% and Alt. 3 between 80-90%. The RATE of recovery is never provided – are we looking at slow change over time. What if an allotment has not been grazed, or is being grazed at a very low level – how will stocking at skyhigh “permitted” levels affect recovery rates under the proposed action? . What is greater than 80% for the proposed action, and what is the time frame? Is it getting to 81% after 25 years? AND how many intermittent, ephemeral, perennial and other drainages will be ignored, or impacts shifted to by “temporary” or permanent fencing in order to claim “improvement” only on major streams?

Why is there no comparison of improvement for ALL springs, seeps and meadows across the project area?

We are shocked that the Forest claims the fisheries potential under Alt 1 is 45-69% of potential. What is used for determining potential. Many streams are completely lacking in native fish, spotted frogs and other important aquatic species. The metapopulations that

are supposed to be the mgmt basis for LCT do not exist, Even where some fish are present, there is no current and adequate info provided on aquatic species numbers, viability, vulnerability to stochastic or disturbance events. There is no basis for claiming an increase. If vacant allotments are to be grazed, large areas of watersheds that are not ‘capable’ of being grazed are being traversed by livestock. Trampled sidehills slough sediment transported during snowmelt and runoff events into streams.

ALL the Forest has done here is GUESS that things will get better. Even though it knows there will e very significant changes with No Grazing Alternative, it minimizes estimates of change there. It provides no scientific basis for understanding were, how, how much better” conditions may be. There is also no analysis of risk and cumulative effects that might inform understanding of how much worse conditions may be – especially if the Forest continues to ignore invasive species, climate change, the severity of existing losses and chronic degradation of springs, seeps and water flows, etc.

Has historic grazing caused a loss of 70-90% of historic floodplains? If so, all livestock grazing will be concentrating on limited remaining riparian areas – and their continued degradation and greater losses are likely.

The sage grouse info is superficial. All the public is given is (preferred alt) “habitat in less than satisfactory condition would move towards satisfactory condition. Potential for nest trampling in concentrated areas”. No Grazing effects are inadequately described.

Plus trampling is just one of many disturbance related impacts caused by cattle to grouse, migratory birds, small mammals, reptiles, etc. Birds/animals may be flushed or displaced by livestock presence – making themselves and young more vulnerable to predation, cattle are now known to EAT sage grouse eggs. There is no assurance that recovered and viable populations will be present. We are told little to nothing about the status of the populations, and habitats not in proper condition. It is impossible, based on the limited analysis and inadequate baseline info, to really draw any conclusions about the effects of the action (see also preceding discussions about numbers of AUMs, grazing “vacant” allotments, livestock facilities proposed, etc.

Upland Vegetation communities: The Forest admits there are ecological problems - but all it commits to even under its Proposed Alt is that the percentage of native, desirable species “would be stabilized or improve”. Stabilized at a very low non-viable level? So even if an area is an atrocious condition, all the Forest would do would be to keep it the same. The Forest forsakes even considering exotic invasive species as a major issue and serious threat. There is no science-based commitment to integrated weed and veg management – such as quarantining livestock before entering public lands, . There is no detailed mapping necessary to understand the degree and severity of threats, and the cumulative effects of depletion, existing and new facilities, roading (often related to livestock facilities) and other causes of vegetation degradation, loss, or alteration of species composition and abundance. Again here as for all values – we are only told that

with no grazing, improvement will occur “faster”. How much faster? Some relative rate, number of years, etc. must be provided in comparing continuing grazing with status quo permitted numbers and all the disturbance that entails, vs. the No Grazing Alternative.

The EIS provides no data to support its conclusion that Alt 2 “should maintain or lead to sustainable, functioning ecological conditions. Where, currently, is grazing disturbance resulting in “sustainable conditions” and where is it not?

Soils: It appears that much of the basis of the Forest’s very limited soils analysis is the same old extremely limited number of riparian plots as in the preceding EIS process. The Forest ignores nearly all springs and seeps, intermittent and ephemeral drainages, and the vast upland areas across the allotment.

SEEPs

The Forest forgets about Forest Plan and amendment 2 standards that under Alt. 1 allow much more stringent standards of use on streams, springs and seeps that are in degraded condition. There is no effort made to recognize that a 5 or 10% use level could be imposed on the eroding, dying springs and seeps.

Livestock use currently begins in late May and overlaps with late nesting, any re-nesting, early brood rearing of grouse. This means that there is tremendous potential for conflicts with nesting birds of all kinds, young pygmy rabbits natal burrows, and “take” of nests, eggs, nestlings of migratory birds, loss and abandonment of raptor nests, and harm to young mammals.

The Forest at 145 states that Alt 2 relies on the ecological condition of the lands to set and make adjustments to grazing use an... by looking at the rangelands as a whole”. The EIS does not provide adequate data on the rangelands as a whole. Please do not use “range” lands. These lands are wilderness, ESA habitat and have other critical values. Use of rangelands only cements a “commodity”-laden mindset use.

Alt 2 seems to loosen criteria to limit when turnout could occur.

Please provide a detailed pasture-by-pasture look at “current ecological conditions”. Please overlay conditions with capable and non-capable lands. What is shown? How many acres of “capable” lands are in degraded lands? How many acres of non-capable lands? How does the Forest factor in the fact that livestock use disturb and degraded no-capable lands?

Where are detailed and comprehensive inventories on all recently acquired lands? How were AUMs factored into the pasture or the allotment prior to acquisition? Has an AU figure for these lands been included in Alt 1? In Alt 2? What is it – and how does it vary

from area to area? How much of the newly acquired lands are not capable? Where is a suitability analysis that weighs values like habitat and recreation on the acquired lands?

The info I Table 3 is laughable. Meager changes of 50 to 40% utilization will not ensure improvement, or even be maintained. It will not provide for sufficient herbaceous nesting cover. It appears in discussions of sage-grouse that the Forest has purposefully omitted a broad body of current literature related to the amount of residual grass stubble height sage-grouse require for successful nesting as well as the percentage of forbs that should be present in understories, and the combined percentages of grasses and forbs.

The Forest has not provided current systematically collected data for Wyoming or any other sagebrush communities that examines microbiotic crusts, sage-grouse herbaceous needs, structural complexity of shrubs, and other info. The 30% utilization will not provide for adequate residual cover of the primary understory grass is Sandberg or other bluegrass, Idaho fescue, Stipa, or even bluebunch wheatgrass. Nor will grazing use during active and critical growing periods – as would occur under the Action. This is an average use, and many plants would be grazed much more severely.

We are very concerned that the Forest has not considered much better protections for cultural sites. Many cultural sites are associated with springs and seeps, scenic high ridges, rock alignments, etc. There is no analysis of how livestock are disturbing cultural sites, breaking and displacing artifacts, moving and disturbing rock blinds, promoting erosion that exposes artifacts and sites to looting, or that destroys scientific values. How does a thousand pound cow trampling a head-cutting eroding meadow negatively impact cultural sites – and how many such areas will continue to suffer these effects? What will be lost? Are sites eligible for the Natural register? What is the significance of sites? We have observed damaged artifact areas, and rockblinds in scenic areas. Identification of areas eligible for National Register protection/complexes of sites vulnerable to grazing disturbance must be examined and the suitability of continued grazing use here weighed. What type of surveys have been conducted, and where? What percent of the landscape?

The EIS has not conducted necessary surveys to identify all sensitive and rare plant sites, or to understand the viability of important and sensitive populations. It has not considered the removal of livestock from important rare plant areas – including through the Suitability Determination. Info on some species was not even known at the time of the old Forest Plan.

The EIS “design features” for sage grouse meadows in nonfunctioning condition are a joke. Livestock must be removed from these sites before more irreversible harm occurs, and they are converted through erosion to dry gullies. The EIS would impose a while series of highly damaging “let-down” or other feces that serve to shift, intensify and move impacts of OTHER sites. How many miles, fences, and where, will be imposed? What will be their adverse effects to grouse? Antelope? Mule deer in winter? Recreationists including wilderness users and values? Fisheries Habitats? What happens

to all meadow or water areas outside the “temporary” fences. What EOA would be done on these? How much use, and where, will be intensified on non-capable lands? How much will erosion accelerate as a result? Weed spread? Where will new livestock trails develop and what cultural values will be altered, degraded or destroyed?

Opening the door to an untold and uncertain number of new fences is like playing wack-a-mole. Cows are killing meadow A – so the Forest proposes to string a “temporary” fence. But the fence intensifies impacts on all unfenced areas – or forces cattle use to concentrate doubly on Meadow B. How quickly and to what degree will herds of cattle destroy meadow B? How degraded is meadow B, and with intensified impacts, will it be lost altogether?

The Forest also claims that grazing would not be authorized during the hot season 1 out of 3 years. So where would the cows go? To the “Vacant allotments”? To pastures with springs and seeps? To pulverize microbiotic crusts in dry Wyoming sagebrush? To areas of non-capable lands? Where will impacts be shifted to? The Forest keeps promising changes – but never provides the details, mechanics and analysis showing how this will all work. So when cattle are not being grazed in one year – where will they be? Will numbers be increased in other areas, or cut by one third?

What are the indirect and cumulative effects of implementing the promised changes?

Soils and Turnout. What soil moisture levels would damage soils? Does this mean if cattle turnout is delayed for 2 weeks, the permittee can stay longer – or graze even larger herds? How will this be handled?

While the Forest promises to make drought adjustments, this is all nebulous, and may be what is occurring already. What typically happens with drought is severe damage to the springs and stream segment with perennial flow. Conditions at remaining wetted areas become severely degraded. New head-cutting and loss of perennial flows escalates. The Forest provides no thresholds, and no criteria for what would stop turnout.

The Forest promises not to concentrate livestock with new management actions in pygmy rabbit habitat – but what about All the existing facilities, salting sites, facility-related roads, grazing of livestock across large areas of non-capable lands that results in intensified impacts on the few “capable” areas and deeper soils sites required by the pygmy rabbit./ Where is landscape-wide baseline survey and analysis for pygmy rabbits? What is the population status and its viability here? What areas need to be restored and what projects that may be degrading habitats removed? How are islands of deeper soils in low sagebrush communities going to be protected? How is the sagebrush mowing area that destroyed pygmy rabbit habitat going to be recovered and restored? What is the current degree and severity of degradation and fragmentation that occurs? The Forest has failed to apply any breakage, browsing or the use standard to sagebrush plants. Standards that significantly limit livestock use and breakage of sagebrush is essential to

providing the dense overhead structurally diverse cover required by the pygmy rabbit. The Forest under Manager Noriega systematically burned patches of thicker sagebrush – to create livestock forage. These were critical pygmy habitats that were destroyed. How does the Forest plan to recover these habitats? Please identify all areas burned, mowed, treated during all periods for which records were kept. Please analyze how this has adversely affected dense sagebrush canopy cover and understory characteristics required by the pygmy rabbit.

The FS claims it would establish transects in high priority sage grouse habitat to make sure there is “adequate cover” and other habitat attributes. The Forest, however, provides no detailed science-based of WHAT it means by adequate herbaceous forb and other cover.

The Forest provides loose, uncertain and ill-defined categories of functioning and other rangeland. The Forest has not shown that there is “capability across the landscape for renewal”. How can cheatgrass-invaded areas be renewed? How can areas of Wyoming sagebrush that have lost large-statured understory bunchgrasses critical for grouse be “renewed”? There is no baseline including detailed mapping of these lands. Is the term capability here the same as capability and suitability analysis? How is it defined? There is no restoration plan for non-functioning rangeland. However, even in this non-functioning category, the Forest seems to assume losses may be reversible – despite strong scientific evidence that losses may not be reversible (see Fleischer 1994). Losses include weed invasions of over-trampled over-used soils. Losses include loss of local sage-grouse populations due to excessive livestock use and disturbance of nesting birds and broods, or losses of occupied pygmy rabbit habitats and separation between occupied areas so that dispersal no longer is possible. This means isolated, inbred populations with losses in viability. Such populations are subject to rapid extinctions – as happened in Washington State with the Columbia Basin DPS. There is not adequate info provided to inform understanding/analysis of the current habitat conditions, connectivity vs. fragmentation, and viability of pygmy rabbit and other important, sensitive and MIS populations. If spring gutting projects and continued livestock use dry up spring flows – how can the permanent loss of water be alleviated?

How can eroded non-capable lands that continue to be grazed as livestock access bits and pieces of “capable” lands be considered “functioning”. Please define all uses of capable at all times throughout the EIS.

While we know the Forest biologist spent a lot of time on the Matrices and did what she was told to do– we again stress that the Matrices - for example, none of the sagebrush communities contain sufficiently dense sagebrush for pygmy rabbit – under these artificial and constrained guidelines. If the Forest were to manage sagebrush habitat as shown in the Matrices, it would wipe out pygmy rabbits. S. We are dismayed that the Forest claims the standards only have to be met “at the end of the growing season”. Please define this – this is typically defined by agencies as mid-fall

(Oct-to even early Nov). If that is the case, then the new plan is greatly worse than the current Amendment II NO Action. Amendment 2 requires livestock be removed BEFORE standards are exceeded. There is nothing in this plan to do so. This greatly increases uncertainty, and leaves the door open for yearly exceedances of standards – continued downward conditions – yet no way to remove livestock before the scheduled off-date. This greater uncertainty also undermines the FS claims that somehow things will get better under the Proposed Action.

We also stress that the definitions refer to “across the landscape”. This demonstrates that the cumulative effects area and analysis must include other allotments and BLM and other lands in these watersheds, as well as analysis of the capability for populations –like sage-grouse and pygmy rabbit.

Monitoring Uncertainties and Shortcomings

The Forest, while imposing this elaborate scheme that requires a large amount of monitoring, does not even commit to comprehensive monitoring. It appears ta ONLY ESA and “non-compliance” areas are high priority for monitoring. This means that vast areas of the landscape will likely not be monitored, as they are lower priority. We again stress the forest has not provided adequate baseline to understand conditions. Plus, since the monitoring is to be the end of the growing season, i.e. fall, there is certain to be a time crunch, areas wont get monitored, use will be exceed with no chance for re-growth. So stubble heights, untrampled banks, and upland veg necessary to prevent erosion during snowmelt, and to provide winter and early spring habitat – including residual grass cover required by sage-grouse for nesting, will not be present. The Forest even admits this (DEIS at 23), “because the soil and veg

The Forest definition of key areas is open-ended and also uncertain – it can be anything from stream reach to a large upland basin. The Forest provides no comprehensive monitoring to strategy – ad the reader of the EIS is not informed if 2 stream reaches or 20 will be monitored. WHERE are all existing Key Areas where monitoring has been done in the past? Please provide detailed info on this. Plus, DEIS at 20 states that the new Key Areas will be done in the AMPs. Since the AMPs will not be NEPA documents, this means the Key Areas will be set up with the permittee breathing down the Forest’s neck, and free from public input, scientific review in a NEPA document and public participation.

This all is the same old effort to strip accountability from ranchers, just like the previous effort. The Forest sets up a complicated and elaborate scheme to determine conditions, keeps the same number f AUMs, provides no specific binding requirements on monitoring, and puts off even the areas where monitoring will occur – until the future. There is also not an adequate baseline in the EIs for the Forest to base any long-term monitoring on across the vast uplands – nor across grazed capable and NON-capable lands, either.

The lack of any criteria and commitments for detailed monitoring under NO Grazing alternative illustrates how the Forest is really not interested in providing a valid analysis of NG. See comments elsewhere on “Other Alts”.

The Comparison of Alternatives Table 7 suffers from all the same defects as the Table S-1. Please apply comments on S-1 to Table 7. For example, Table 7 claims coliform bacteria decrease. Since the Forest both opens vacant allotments as well as never reveals actual use, it is very likely that bacterial levels, sediment, turbidity, water temp, DO₂, nutrients, ground cover, compaction, erosion (why won't the Forest recognize the critical role of microbiotic crusts and current science here), bank stability, fisheries populations, sage grouse nesting, sage grouse brood rearing, riparian habitat, and health, riparian-percent area ground, aspen regen. Upland veg composition, noxious weeds 9WHERE are invasive species concerns like cheatgrass,)will INCREASE under the proposed action from the current setting. And, as we have described it is very likely that AUMs actually grazed may increase.

The Forest cannot assure that it is complying with NFMA and MUSYA until it provides an adequate baseline, addresses microbiotic crusts, spring and seep and water quantity, watershed integrated analysis, desertification, climate change/global warming, important, sensitive and T&E viability and habitat including connectivity/fragmentation analyses and identifies and assesses population viability here. There is no certainty that the values/resources WILL be available for future generations.

The Forest likewise errs in understanding irreversible commitments. By claiming it applies largely to non-renewable resources. For example, the ICBEMP process found that 805 or more of rip areas – including over vast areas of public lands had been severely altered, degraded, or lost. Grazing and other activities play a significant role in this. HOW much has “historical:” grazing reduced potential – for example -shrinking if wet meadows due to head-cutting and soils erosion? Weed invasion? This is a grazing EIS, and the Forest must describe in detail how grazing affects lands.

The Forest's description of climate forsakes any analysis of much hotter and drier site conditions here are due to livestock-facilitated desertification, It also forsakes examining how desertification feeds into global warming, the role of livestock in this all including methane production. A third grader could have written this.

The Forest's passing mention of spring characteristics fails to describe spring-by-spring the type of spring (see Sada references and spring discussion), and the current effects of desertification, development, livestock use, etc. Have water and other inventories been conducted on BLM or Forest land in the past? More recently? What have they found? What springs have dried up? Where? How has this altered capability and suitability of lands for livestock use? How will continued livestock use (including at the very high levels) further reduce and diminish spring flows, perennial flows, habitat quality and quantity? Where? (Pastures, allotments < watersheds).

We are glad to see that the Forest admits that soil compaction and ground cover removal by livestock has “the potential to increase runoff and sediment transport into streams by reducing the amount of infiltration and interception of precip. being retained and slowly released i.e. lands are desertified – they are drier] . The Forest then proceeds to provide NO data on desertification. Examination of old wetland soils (now dry) the degree of downcutting, and other factors _ and other science can readily be conducted to estimate how severe losses are. The Forest ignores all of this – oddly by claiming there are no gauges.

The water quality data is old, limited and contains no springs or seeps. There is no date provided, The FS does not assure the public that the info was collected during or immediately after livestock were present, It is of little to no value without much more detailed and current info WHERE is bacterial sampling – this is critical at understanding effects on aquatic species, wildlife, and recreational users including visitors in the Wilderness.

It is nice that the Forest mentions off-Forest effects of diversion, where is the analysis of the on-Forest effects of spring developments/diversion. How many are there? Where? Direct, indirect and cumulative effects? How are they hindering connectivity, recovery or viable populations of aquatic species? Reducing sage-grouse and other habitats

... the Forest continues to pursue a highly uncertain loose and open-ended adaptive management grazing scheme, while planning to stock lands not capable of withstanding livestock effects even under the agency’s own definitions.

This whole exercise is an effort begun years ago under industry-driven Bush admin policies. Its purpose is to gut the requirements of Amendment 2 that require accountability by the public lands livestock industry.

Foundation of Grazing Analysis in the “Rangeland” EIS is Livestock Industry Myth, a Greenhouse Study from the 1950s, and a Pamphlet --- Ecological Science Is Cast Aside, Minimized, or Belittled

Just like in the previous Martin Bain EIS effort, the Forest continues the scientific blindness of the Bush administration. The Forest centers its grazing effects analysis – and thus the whole EIS effort – around a greenhouse study on effects of clipping grass (Crider) and a pamphlet (Dietz) describing “Grass, the Stockmen’s Friend”. NEPA, NFMA, the ESA, the Data Quality Act, Forest policies and the public interest require that agencies use sound and current science. Centering its understanding of grazing effects on an indoor study and a booklet poisons the entire effort. This also results in a disastrously high use/utilization across uplands, and status quo “permitted” stocking rates above levels able to be grazed on these lands.

A broad body of current ecological science is ignored or only paid lip service. There is no integration of grazing trampling from the gross overstocking of the “permitted AUMs” fostering cheatgrass through damage to microbiotic crusts, shifts in species composition over time, disruption of watershed processes or any other factors. Instead, the EIS is based on a simplistic fairy tale world view of grazing effects. “Take half, leave half” has been shown to be a resounding failure as weed invasion sweeps the sagebrush biome, native species habitats are further altered and destroyed, ecosystems unravel, and sensitive species face reduced viability and imperilment. See Status of the Nation’s Biological Resources (1998), Belksy and Gelbard (2000), Dobkin and Sauder (2004), XXX “triage”.

The Forest must start this process over (see discussion of Purpose and Need), and base any analysis here on a broad scientific integration and honest analysis of the effects of grazing and trampling on shrubsteppe and other native ecosystems in the arid West.

Forest Blissfully Ignores Desertification Processes, Climate Change, Global Warming Effects on Uplands, Losses of Springs and Seeps, Degraded Drainage Networks, Watershed Processes, Biodiversity, Habitats and Viability of Important and Sensitive Species

Livestock grazing disturbance promotes desertification processes in arid western lands. It makes sites hotter, drier, depauperate --- and more deserts.

For example, see

<http://www.climatescience.gov/Library/sap/sap4-2/final-report/default.htm>

“Several examples of threshold crossings or transitions that illustrate this definition are described in Groffman et al., 2006. These include the interactions of drought and overgrazing that trigger runaway desertification, and the exceeding of some critical load,

as with the toxicity limit of a contaminant or elimination of a keystone species by grazing, so that when one component of the system fails, it provokes a domino-like cascade of instability that substantially alters the rest of the system.”.

Chronic livestock disturbance here has caused and continues to cause desertification. This represents local climate change and feeds into the global warming cycle. See Sheridan CEQ 1981, Dregne 1986, Steinfeld et al. 2006, Fagre et al. 2009

<http://www.climatescience.gov/Library/sap/sap4-2/final-report/default.htm>. Livestock emit methane, a potent global warming gas. Livestock removal of vegetation and trampling causes alteration of community composition, function and structure (see Sheridan 1986, Fleischner 1994) and adverse effects to microbiotic crusts and native vegetation reduce the ability of wild lands to sequester carbon --- naturally. Yet the Forest, fixated on some

placid greenhouse study 1950's world view of cattle effects, and concerns (including over greenhouse gases!) that WWP has raised throughout this prolonged EIS effort. How, we wonder

Proposed Action Removes Accountability and Adaptive Actions Under Amendment 2, and Imposes Uncertain Adaptive Management Scheme that Strips Rancher Accountability

The Forest actually gets rid of the best adaptive management action it has: The Adaptive action is the No Action Amendment 2 provisions that serve as triggers for removal of livestock during the grazing period in any one pasture or area. Amendment 2 requires that grazing livestock be moved out of pastures as standards of use are met, not in fall at the end of the growing season after grazing damage is done, or use levels exceeded during sensitive periods. Amendment 2 standards are triggers for removal of livestock to prevent new damage. Under the new scheme with much less accountability and thus much greater uncertainty, new livestock damage can happen each and every year as nothing exists that prevents it. This also allows greater use to occur in lands grazed in late spring and early summer during the active growing period or with exceptional rains, as plants may be grazed to very low levels including during sensitive nesting and birthing periods for native species, and some "regrowth" occur but the levels of use are not measured until the fall. Thus there will be no way to track habitat effects during critical periods. By the time the growing season ends, no regrowth is possible. Plus, in moister and mesic areas, regrowth may also occur after cattle leave but serious bank and other damage persist, as well as damage to plants from suffering heavy grazing - thus weakening "desirable" mesic and hydric species and causing shifts to the Kentucky bluegrass and other weedy species that are poor bank stabilizers. This condition is prevalent in many portions of the EIS lands. Under this scheme, it will only get worse - as levels of severe use will not be detected or prevented. Nor will hoof trampling damage to banks, a critical factor that must be controlled and minimized to protect watersheds, ESA and sensitive species habitats and populations, and aquatic habitat components. Under the Forest Plan and under Amendment 2, the Forest has broad latitude to apply LOWER use levels than at present, and also apply standards to protect soils, including bank trampling standards across all riparian and meadow habitats. It has failed to do so, despite WWP requests. Now in the EIS not only does the Forest try to get rid of Amendment 2 without ever having implemented many of the potential actions the Amendment and the Forest Plan allow, the Forest never even considers critical stream and springbrook bank trampling protections under No Action or the Proposed Action.

In the DEIS's highly uncertain AM scheme, grazing standards apply only at the end of the growing season - which is fall. Year after year, under the Forest's Proposed Action grazing and AM scheme, standards can be exceeded, and all that will happen is something different under the new AM will be developed behind closed doors. Or band-aid "temporary" fences will be slapped up without adequate NEPA processes - thus shifting and concentrating cattle damage in other areas, extending irreversible soil

erosion, weed invasions, LCT habitat, sage grouse habitat, pygmy rabbit habitat losses and harms.

Then, in the Forest's longer term complex and unrealistic monitoring scheme, making changes on the ground like cutting cattle numbers/AUMs is based on complex, uncertain and expensive vegetation community monitoring that it is highly unlikely will ever occur. The Forest has had a very limited staff and budget, and with the current financial crisis facing the country, relying on the complicated and elaborate schemes for an "ideal" condition of various vegetation communities makes no sense. The Forest is unlikely to have sufficient info --- ever --- to conduct studies adequate to track the complicated criteria it has established. If the Forest is going to adopt such a risky scheme, then the EIS that does so must provide a current systematic ecological survey across all uplands and watersheds, and the Forest must include an Assessments of the risks of continued cheatgrass and other weed invasions and losses of sage-grouse and other sensitive species habitat based on comprehensive ecological data to serve as a baseline. The Forest needs to be honest with the public and provide a history of how strapped for funds, personnel, and the frequent personnel shifts in the Forest that result in the inability to monitor adequately even now with a much less demanding system. The public deserves a real-world analysis, not more fantasy-based management like stems from the Crider greenhouse snipping and the Dietz pamphlet.

WWP has called the Humboldt-Toiyabe Forest about serious concerns over grazing effects – and we frequently get told “we just don’t have enough staff to monitor all if it, to get out there in time, etc.”. How in the world can the Forest expect the elaborate Matrix scheme to ever work in the real world? How much time and effort will it take? How much will it cost? How many personnel? What if funding is cut below even the present levels. The Forest certainly won’t be able to pay for it based on the \$26,000 estimate of grazing fees it annually receives (typically much less than this because AUMs actually being grazed are below “permitted” paper cow levels). Grazing fees won’t hardly pay for a summer temporary. The Forest (in its greatly inadequate economics analysis and throughout the EIS), bases it no action alternative, “baseline” condition understanding and analyses on the bloated “permitted” stocking rates. These include a large number (never revealed) of AUMs that are not used on a regular basis.

Without providing a year-by-year accounting of actual use (number of cattle grazed and how long – AUMs) pasture-by-pasture and allotment-by-allotment, it is impossible to understand the environmental baseline, develop an adequate range of alternatives, analyze environmental effects,

The EIS fails to provide critical info and analysis on Actual Numbers of Livestock Being Grazed, and annual and other Monitoring showing the effects of such use.

This can only be viewed as an effort to artificially prop up the re-sale value of a grazing permit by through continuing to ignore that violation of standards, depletion,

desertification, drought, non-compliance and other actions all have resulted in far fewer livestock being grazed than shown on paper under “permitted” AUMs.

An honest and scientifically valid EIS process can not occur until the Forest does this, and levels with the public instead of trying to cove up and keep re-sale value of permits high.

This and other “nuts and bolts” information on how grazing has actually been carried out in the Santa Rosas in recent decades up to the present is essential to understand the number of AUMs grazed/stocking rate, how long cattle are present and where, etc - and other cow basics that have caused the levels of degradation - and few areas of lead to the areas of claimed improvement on the Forest must be provided and analyzed.

All the Forest does is to say there used to be scads of cows and sheep a hundred years ago, and now there are many fewer and only cows. While there may be many fewer cows than in 1890, damage is additive, cumulative, and the real number of cows being grazed on the land in recent years is necessary to understand effects of any proposed actins- and to conduct adequate consultation with USFWS over impacts to ESA-listed species, or discussions with state Game departments or other agencies over the environmental effects of an agency’s decision. Actual grazing use and real world stocking also must be factored into understanding of the capability analyses (rangeland, MIS, sensitive and other species) and the suitability analysis. If only half the AUMs were being grazed in a particular land area, would grazing/stocking up to the “permitted” paper number of AUMs force cattle to crisscross more areas of steeper and unstable slopes to find food or water? If so, how many more acres of non-capable lands will be intensively disturbed? This especially the case in many of these allotments, where “capable” lands are often non-contiguous, are found in scattered patches, and/or already highly degraded by diminishment of understories, weeds, erosion, compaction, etc.

If only half the “permitted” AUMs have been grazed in recent years in a particular ESA habitat or sage-grouse nesting areas, and now the Forest proposes an allocation allowing double the actual use to occur indefinitely – this must be woven into all EIS analyses, including allocation of AUMs under the EIS. Double the number of cows means double the amount of trampling disturbance. Where would grazing the “permitted” number of AUMs on an annual basis exceed what actually has been happening on the ground. Plus if the Forest is to adequately examine the effects of its actions and the interplay with climate change, including climate change in amplifying grazing disturbance effects here, or to account for the methane produced, it must know how many cows have been grazed and where.

Another part of the grazing mechanics that is overlooked is the effects of seasons of use, turnout times, etc. – from disturbing nesting birds in late spring to concentrating use on a handful of perennial stream areas in late summer. How do AOIs over the past 20 years inform effects on sensitive species, ecological conditions, population losses or viability?

Serious Ecological Harm to Spring and Seeps Not Examined – Baseline Studies and Analyses Lacking

The Forest DEIS, little changed from the prior effort, simply does not provide and analyze adequate data on water, watershed processes and drainage networks. This is especially the case with spring and seeps and small drainages (intermittent , ephemeral and some perennial drainages too), and the upland ecological conditions and vulnerabilities across the Santa Rosa Range landscape. With continued grazing disturbance.

MARTIN BASIN EIS SUPPLEMENT 2011

In 2011, a Draft Supplement to the Martin Basin EIS was prepared, purporting to examine impacts, and flinging long-ungrazed allotments open to weed inundation and degradation from grossly overstocked herds. The tiny clique of greedy ranchers who have the privilege of getting nearly free grazing on Forest lands have incessantly pushed for more and more and more damaging destructive cattle grazing. Each and every concern raised here remains relevant with the current 2020 proposal. Please apply each underlined section of comment to the current 2020 process, as the NOPA contains almost no concrete information on baseline ecological conditions - both inside and outside Wilderness lands and within IRAs.

RE: Martin Basin Rangeland Project, Draft Supplement to the FEIS
Comments-intermt-n-humboldt-toiyabe-santarosa@fs.fed.us

Dear Santa Rosa Forest Service,

Draft Supplement to the Martin Basin Rangeland FEIS.

The Feb 2011 Supplement is indeed a programmatic, largely fantasyland document that attempts to deceive the public. It must be withdrawn, and real and substantial honest information on the actual baseline and impacts of grazing on the fragile wilderness must be provided.

The reader is repeatedly told in the Supplement analyses of all the critical components of Wilderness, as well as all other elements of the environment, that impacts are predicted to be largely the same, or lower because of lower standards. Yet in several allotments, such as Rebel Creek, it is clear far more livestock would be grazed, including in Wilderness, under the permits proposed than have been able to be grazed in the past. The No Action discussion lays a false baseline –pretending the full AUMs in Table 46 have actually been being grazed. This is not the case.

We are including recent FOIA documents received on cd to be entered into the record for this EIS Supplement.

From these documents, it is clear the numbers of livestock under which new permits had been issued in in Wilderness allotments, as well as in Wilderness allotments under this action are pure fantasy. The Forest appears to be issuing fraudulent permits with astronomically high AUMs that it knows could never be grazed without severe damage to lands and waters – including of the Santa Rosa Paradise Peak Wilderness. Please incorporate all documents from the current – and previous public monitoring FOIAs for the Santa Rosa RD into this project record.

Why are you misleading the public? To issue an inflated permit so that permittees can seek bank loans on ungrazable AUMs? To artificially inflate – many times over – the number of AUMs on the permit so that that the resale value if quadrupled, quintupled, etc. – over the number that could actually be grazed and have standards be met? Please see the letters of non-compliance with recent FOIA.

And what will happen – if just to prove a point and keep the ag. loans and other subsidies coming – ranchers actually turn out all the livestock that would be allowed? Please conduct a valid analysis of this, too – not just false claims of “improvement” or “Maintenance” if/when all the sky high cow numbers on the permits would be turned out?

This whole process has been a travesty. The Forest, under political pressure, started out on a process based on quackery of the Dietz Sunshine pamphlet range “Management” and highly uncertain adaptive management. It has continued in this vein throughout – pretending that somehow the numbers of cows, and the trampling damage and other disturbance that they inflict all over watersheds – somehow just doesn’t matter.

Supp at 5 shows not a single iota of change to any Alternatives - despite:

- Rampant permittee exceedances and non-compliance in 2010 Grazing year of the supposed standards that are supposed to trigger livestock movement. This shows the high stocking on all the permits is unrealistic.
- Many new facilities that themselves are harmful to wildlife and recreation that have been imposed to try to sustain unsustainable AUMs. This is necessary for understanding cumulative impacts, too.
- Significant new information on sage-grouse, including large-scale habitat and population losses, and information in the Fed Reg WBP Finding as well as Knick and Connelly (2009) Studies in Avian Biology/Sage Grouse Monograph on the perilous

status of habitats and populations, and the array of threats these birds and the sagebrush habitat faces.

- A battery of new energy (Westwide energy corridor), gas pipeline (Ruby) and other projects affecting lands and habitats in this area
- An ever-growing body of science on livestock harms to arid lands ecosystems.

Supp Chapter 3 irreversible/irretrievable analysis is flawed. Cheatgrass invasion, soil erosion, displacement of wildlife leading to stress, injury or death in the wake of huge herds of swarm-grazed livestock on exceedingly limited capable lands of the wilderness is irreversible.

Claims are made that the Forest is following a cultural MOU and changed things where appropriate – precisely where were any changes made? WHAT sites were being impacted, and why? It is impossible to comment on something that is just hollow, empty words. “When appropriate, recommendations are included in AOPs” – where and when and what has been included in each AMP? Aren’t nearly all springs cultural sites? How could springs be restored, rather than further degraded, under and expanded range of alternative actions that would remove livestock from areas with conflicts? Did you tell the SHPO you were imposing cattle vastly in excess of numbers that have ever been able to be grazed in recent years?

The Forest discussion of soil productivity ignored analysis of impacts on microbiotic crusts, extensive livestock use by numbers of livestock vastly in excess of the number grazed in lands for the past several decades, the critical role of microbiotic crusts and the impacts of trampling. The Forest’s soils pit and other data is all, or nearly all, from OUTSIDE THE WILDERNESS.

Loss of soil, invasion of cheatgrass and other weeds is irretrievable, especially in any wild rugged landscape – where soil formation rates are infinitesimal, and it may take several millennia to replace soils, where cultural sites once exposed by livestock trampling to erosion or churning will be lost or damaged forever, where gullying and headcutting may dry out and desertify permanent surface water flows, where cheatgrass invasion into soils churned by livestock destroys the potential to regenerate native vegetation.

No trampling standard of any kind is imposed on any areas – relying on utilization never tracks the impacts, or prevents the damage - from thousand pound (**half ton**) cattle and often 400 lb. calves “extra” animals on steep, rugged terrain including granitic soils where Ums are confined to narrow riparian areas, and the very limited flatter terrain. The EIS design features have failed resoundingly in 2010. WHERE is the Forest’s

“adaptation” to learn a lesson for this – and abandon the deeply flawed EIS stocking rates, and stocking of Vacant allotments?

The area of impacts on page 9 is much too small – livestock trailing up steep slopes in narrow confined canyons may extend over a half mile or more – with erosion, weeds, disturbed habitats.

The statement that Wilderness impacts are analyzed in depth (Supp at 9P is in error. Supp at 10. We note that grazing was not even occurring in significant areas of the Wilderness, like Rebel Creek, at the time of Wilderness designation.

The Forest is required to not impair these lands. There is no honest and accurate baseline laid out for understanding the current vs. significantly expanded and irreversible impairment that will stem from this flawed action.

Supplement Mapping

Mapping was provided that shows cheatgrass presence. Large areas of the allotments have cheatgrass. Cheatgrass is not sustainable forage – and cannot be used in the “production” base. Pretty much the flatter areas of the allotments outside the Wilderness have a significant cheatgrass component – in 2004. So by now there is certainly more. The Wilderness lands are greatly at risk from expanded cheatgrass –especially if faced with livestock disturbance and climate change effects. Instead of sacrificing Wilderness lands to livestock, the Forest must act to prevent cheatgrass and other weed impairment by livestock and keep all grazing out of the Wilderness. Any grazing (at a greatly reduced number) to occur could only be allowed in flatter non-Wilderness areas where tremendous effort could be made to control weeds, rehab cheatgrass wastelands through heavy equipment drill seeding, etc. It is madness to impose grazing use on these steep, rugged weed-vulnerable lands. Why hasn’t the Forest considered an alternative that closes all Wilderness areas?

How many Capable acres of the Buffalo, Granite Peak, Rebel Creek, and other Wilderness allotments lie within the Wilderness? Does Table 45 include ALL allotment lands – and still arrive at such a low capable figure? How in the world could the Forest impose the very large numbers of AUMs for Cerri on lands with hardly any Capable acres? This is irrational, and the only explanation must be political pressures to cater to the livestock industry. What percentage of Capable lands are located in the Wilderness, and where? Where are camp sites? Trails. Wildflower displays? Rare animal habitats?

Where is a map that shows how any mapped Capable acres in the Wilderness overlies trails, meadows, springs, and streams? Isn’t this essential to understand how significant, additive, overlapping and cumulative cattle grazing and trampling impacts will be?

The Supp and EIS do not adequately describe the effects on all lands – let alone the Wilderness –as clamed in Supp at 13.

The Forest’s own map – page 12- of Wilderness allotments shows that the subject allotments (Buffalo, Granite Peak, Rebel Creek), comprise ¾ of the Wilderness Paradise Peak Wilderness area!

The map WWP is submitting with LCT “capable” areas is the Forest’s own map. It shows that several areas are shown as Capable inside the Wilderness that have no fish, or hardly any fish (such as forks of Canyon Creek).

Untrammeled

Imposing large herds of hundreds of swarm-grazed mooing defecating pathogen-infested cattle on Wilderness will trammel it. This promotes cheatgrass, manure/cowpies - all signs of human disturbance.

Reader is not even provided a map of fences that exist to confine cattle – where are all fences in Wilderness trammeling the landscape.

DETAILED MAPPING OF ALL FACILITIES AND A HARD EIS-LEVEL LOOK AT THE DAMAGE THEY ARE CAUSING TO PUBLIC LANDS MUST TAKE PLACE. While the Forest provides a map with trough symbols – there is no visual, natural value, or other analysis of how and to what degree these facilities trammel the Wilderness in each site they are present. Is there a shiny ugly cattle trough surrounded by a sea of manure and muddy cow footprints promoting West Nile virus? Are the facilities located by the only flat capable site for miles around?

Often, there is a single trail – or path through rock outcroppings or across slopes amid mountain shrub fields – and livestock and hikers will be in the very same area. Imagine a “swarm” of over 200 cattle and all their calves – meaning likely far more than 400 animals in the confines of the narrow Rebel Creek! This kind of specific trail by trail, site by site, “pasture” by pasture and allotment by allotment analysis must be conducted. The Forest has carved the landscape up into “pastures” with no indication that pastures are fenced, and with no analysis of how many capable acres really exist in any “pasture”. How can there be “pastures” in AMPs/permits – as in Cerri – and there be no pasture-by-pasture analysis of all Wilderness and other conflicts laid out? We again stress that the fantastical number appears to be derived from the days before Wilderness designation – when domestic sheep were grazed here.

The Forest – for all Wilderness allotments – has not specified how many cattle AUMs have been stocked and actually grazed inside the Wilderness –vs. outside the Wilderness in recent decades. Where is this information Where is Wilderness monitoring info? The

very limited monitoring info the Forest does provide shows little to no monitoring info inside Wilderness. See for example –

There is no monitoring protocol - and not a shred of Wilderness monitoring – such as manure transects in campable sites, livestock trail conflict monitoring, or any other info prided for the Wilderness, or that would be required under the greatly flawed Supp and sky-high cattle stocking permits.

Natural and Undeveloped

We have included many concerns about impairment of natural values in our earlier comments – and livestock degradation and destruction of composition, health and structure of vegetative components. This also translates into habitat degradation and loss – and deprives visitors from experiencing thriving wildlife fisheries and other populations. Cattle promote weed infestation and spread. Weeds are a serious problem – cheatgrass, white top, Scotch thistle, etc. in the SRRD. How can imposing livestock at numbers vastly in excess of those grazed in past decades, or at levels known to promote exceedances, not impair natural values? The cows and the recreationalists occupy the same space – moving up and down canyons, or on slopes where the sight, smell, sounds, of livestock are audible and visible over large areas. If even a few cows are present in these areas with vey narrow rugged canyons, any late spring-summer-fall Wilderness visit will be greatly marred during the time of the visit. Entire backpack trip outings will be marred by livestock sight, sound, smell, having to avoid bulls or cows defensive of calves, etc. Illnesses may result from bacteria, West Nile or other livestock and facility-promoted diseases.

Plus the long-lasting legacy of chronic livestock disturbance will translate into permanent degradation of Wilderness values – example cheatgrass replacing a vivid balsamroot wildflower display on canyon slopes, or high ridgelines devoid of sage grouse seeking summer green forbs or cooler sagebrush locales. Hiking, camping, sightseeing, and other recreational experiences in wild land settings will be greatly marred over the short, mid and long term. There is no evidence that the Forest has successfully restored cheatgrass or other weed-infested lands.

A 40% upland use level means that cattle can consume on the average 40% of the aboveground biomass. AND the first aboveground biomass to be consumed on native forbs is the flowers! So there will be a dramatic reduction in wildflower displays if livestock are grazed/swarm-grazed – greatly detracting from recreational use and enjoyment. Review of the Cerri and other grazing plans sure looks like mass swarm grazing is being imposed – sequentially - over the entire Wilderness area.

A detailed analysis of HOW the various use levels, and all the direct, indirect and cumulative impacts of cattle use at astronomical stocking rates will impair values must be

laid out. What level of harm is done by on year's gross exceedance? Two years? Such exceedances over the next decade?

The whole system is based on permittees actually meeting standards. As the letters of non-compliance show – this is not happening.

There is no evidence that any standards will be met if permitted numbers are grazed/swarm grazed. How many irreversible/irretrievable impacts will result from grazing at numbers vastly in excess of those grazed in the past – or that have been shown to cause exceedances? How much more will trails erode – making them impassable and forcing use onto steep, erodible sideslopes where even a passing hiker may dislodge considerable soil and cause impacts including sedimentation onto the small greatly vulnerable streams?

How many Forest monitoring areas are inside the Wilderness? Where? How often will these sites be monitored by the Forest? From our review of the limited monitoring that the Forest has been conducting – some springs and other areas required under a settlement of WWP litigation to be monitored are not even being monitored.

How can a meadow campsite be considered “natural, undeveloped and have an outstanding opportunity for solitude” if it reeks like a feedlot, has a trampled, polluted water trough area, and is filled with sounds of cattle mooing and elbowing campers out of the way for the scarce level areas - all of which are signs of an unnatural human disturbance?

The Supplement's analysis of impacts on solitude states that “key factors for this quality are opportunities for isolation from the sights and sounds of management activities inside wilderness and the presence of others” (Supp at 15).

This Supplement must be re-done. This entire process scrapped. Grazing throughout the Wilderness and the RD based on a truthful analysis of impacts and realistic – not fantasy stocking – must be conducted. Otherwise, the entire process is a sham and dishonest to the public – as this one is.

Cattle cannot be turned out in 2011 – under the current fantasy-based dishonest analysis that underlies much of the EIS, Rebel Creek and other wilderness allotments in particular.

Bighorn Sheep Concerns

Bighorns are native species, greatly prized by many recreationists.

Here is what the Forest's own documents say about bighorns. (Pasted below).

Studies in the Owyhees and elsewhere with an established bighorn herd show that bighorns leave areas/are forced into sub-optimal habitat - once large herds of cattle are

moved into them. So grazing cows in bighorn habitat will deprive visitors of opportunities to see native sheep, and the very high value of bighorn sheep permits to hunters and recreation income to the local community may be lost or reduced. Just like it reduces or deprives visitors of abundant LCT in many watersheds, or the opportunity to see a sage-grouse or rare plant.

From the Forest's own documents:

<http://www.fs.fed.us/r2/projects/scp/assessments/rockymountainbighornsheep.pdf>

page 28

Localized competition between bighorn sheep and domestic livestock, elk, feral burros, and exotic wild sheep and goats is a potential limiting factor for many bighorn populations (Streeter 1969). Overgrazing by domestic livestock, particularly goats and sheep, has the potential to degrade bighorn habitat through significant changes in plant composition and density, leading to reduced carrying capacity for bighorn sheep. McQuivey (1978) and Steinkamp (1990) found that bighorn sheep avoided habitats occupied by cattle, and Bavin (1982) showed that cattle could be significant competitors with bighorns, especially in years with limited forage production due to drought. **Cook (1990) suggested that heavy use of vegetation in riparian areas by cattle might preclude bighorn sheep access to critical vegetation resources during summer months.** The conversion of grasslands to large shrub fields as a result of overgrazing by domestic livestock reduces the overall carrying capacity of bighorn sheep range and may lead to more predation by increasing hiding cover for stalking predators. The conversion of grasslands to shrub communities may also lead to higher numbers of deer and increased population densities of cougars (*Puma concolor*), which could compound the effects of competition and predation on bighorn herds.

PLEASE NOTE from the Forest's own info above: **Cook (1990) suggested that heavy use of vegetation in riparian areas by cattle might preclude bighorn sheep access to critical vegetation resources during summer months.** Since the narrow riparian stringers are really the only places the cows will really be in the Wilderness, then this is a very likely adverse impact of swamping Wilderness lands with cattle.

See also Bissonett and Steinkamp 1996 (on cd). Since areas of the Wilderness have suffered minimal cattle grazing use in many areas in recent years – the impacts of swamping bighorns with Cerri, Bar X and other cows at high numbers - in “swarms” may be particularly harmful. Where specifically will both – cattle and people – impact bighorns? What will be the cumulative impacts of disturbance? Wasn't this population at a much-reduced level - and still recovering? Where is water limited near bighorn escape habitat – and bighorns may face competition at water, too?

Please see WWP's earlier April 2011 comments expressing concerns about conflicts with sage-grouse, golden eagle and goshawk nesting, etc.

What parasites or insect pests will be promoted by herds of 200 cattle plus 200 calves in small, confined rocky canyon habitat right next to a small bighorn population? How might buffalo gnats or other cow pests impact bighorns? Hikers?

Won't grazing under these skyhigh permitted levels result in dozens if not hundreds of more cattle AUMs than bighorn AUMs?

Special Features

The analysis of impacts to special features (Supp at 15 and elsewhere is greatly lacking) is a travesty. Indeed "swarms" of livestock vastly in excess of levels grazed in the past will "cause loss of undercut banks and other cover, exposed[sic?] stream channels, increased silt loads, increased silt loads, and wider and shallower streams that ultimately cause elevated water temperatures during the summer and colder temperatures during the winter". Where, in each allotment, each of the "pastures" lands like Rebel Creek have now somehow been carved up into, and each segment of streams receive these effects under the grazing scheme? How difficult will it be to recover habitats – once deeper incisement and gullying occurs?

SHAM ANALYSIS of IMPACTS

Martin Basin Supplement at 17 claims livestock have been grazing at current levels or greater intensity for a hundred years. There is no data provided to show this is true. Domestic sheep were grazed throughout the area – and then - apparently in the 1980s – permits were converted to cattle. Cattle do not use steep slopes, rugged terrain, etc. like sheep – so much less land area is actually usable by cows. However, in many areas, it appears AUMs on the permits or shown in old files were not reduced to levels that comply with current Capability or ecological science.

The Vacant Rebel allotment was not even being grazed when the wilderness as designated – and has received no use, or much less use throughout the past couple of decades – at least. See 2010 FOIA documents Bar X permit showing 75 cattle for 1 month in Rebel Creek. Compare this to "Current Management Alternative for Allotments" Table 46, Supp at 16. This lists 255 cow-calf pairs from June 16 to August 31. This is approximately 4 times as many cattle as were grazed in 2010. Throughout its analysis of Alt. 1, the Forest claims as it does in Supp at 17 that "the untrammled quality of the SRPPW would remain the same as it has been over the last 10 or 20 years". This is repeated everywhere. Example natural values: The impacts to the natural appearance of vegetation, soils, water quality and wildlife would not reflect a change".

The Forest repeatedly in its analysis assumes that the skyhigh number of cows on the paper permits under supposed “current management” actually reflect what has been occurring - and they did not. Is the Forest using as its Baseline in the new Decision? What had been occurring? Has the Forest unlawfully allowed grazing in Wilderness without conducting this analysis?

The Forest THEN goes on to repeatedly claim that for all the components of Wilderness and the environment, impacts under the only grazing alternative rubberstamped forward – would be less because use levels on paper would be less. BUT it never analyzes the impacts of quadrupling livestock numbers, or frequent/routine exceedances of use.

This whole process is a sham, and an effort to deprive the recreational public of a high quality Wilderness experience by allowing 2 or 3 permittees to swamp Wilderness lands with high numbers of swarm grazed livestock that have never been able to be sustained here in recent years.

Please retract this Supplement, and produces a new SEIS that fully and HONESTLY lays out a valid baseline of data and ecological and Wilderness conditions. Then develop a suitable range of alternatives based on an honest, and not a rubberstamp, dishonest, analysis.

In the interim, no Cerri, Bar X or other Wilderness grazing in the subject allotments can be allowed.

How much taxpayer funding has been spent in this rubberstamp Supplement to date trying to deceive the public and line the pockets of the permittees?

The 2020 analysis must fully conduct baseline studies and gather concrete credible science-based information all of the UNDERLINED CONCERNS AND COMMENTS., and must provide an in-depth analysis of grazing harms to Wilderness areas across the RD, as well as document changes in cheatgrass, other weeds, wildlife species habitat quality and quantity, wildlife and aquatic species populations, and areas of occupied habitat, and a host of other values of the FS lands and Wilderness. How have ecological condition changed since the HTNF Forest plan was designated? How have conditions changed within the project area since that time? Since the Martin Basin EIS, and then the supplement, was finalized – vs. 2020?

Sincerely,

A handwritten signature in cursive script, appearing to read "Katie Fite".

Katie Fite
Public Lands Director
WildLands Defense



Attachments:

CD with scientific Allotments and Literature, and Objection Part 2.