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Organization: Mono Lake Committee

Title: Policy Director

Comments: Dear Mr Coogan,

The Mono Lake Committee (MLC) provides these comments on the Humboldt-Toiyabe National Forest's Notice of Proposed Action (NOPA) for the Bridgeport Southwest Rangeland Project (Project). The Project proposes to reopen old sheep grazing allotments that have not been utilized since 2009, for cattle grazing. It is important to note that cattle have never grazed on these allotments. This is a significant change that needs to be thoroughly analyzed through an environmental impact statement (EIS). MLC's focus is on the impacts to the allotments within the Mono Basin watershed and recommends that the principles be applied throughout the Project. MLC commented previously during the scoping period and the release of the first NOPA on July 9, 2019.

MLC is a non-profit citizen's group dedicated to protecting and restoring the Mono Basin ecosystem, educating the public about Mono Lake and the impacts on the environment of excessive water use, and promoting cooperative solutions that protect Mono Lake and meet real water needs without transferring environmental problems to other areas. Supported by 16,000 members, the MLC has been active in the Mono Basin since 1978.

1. No alternatives and insufficient environmental analysis

MLC understands the Humboldt-Toiyabe's assessment of the capability and suitability of cattle in the proposed allotments and recognizes the specific design features listed to "avoid or minimize potential impacts." However, the NOPA states that there is no data or clearly defined alternatives in which to objectively evaluate how the environment would respond to cattle vs sheep at varying numbers or range alterations. Cattle grazing is a significant departure from sheep grazing in terms of landscape and watershed impacts, and some of the affected habitats have been in recovery from the impact of sheep grazing since 2004. The attached letters, submitted during the scoping and the initial NOPA in 2019 outline the Committee's concerns. The NOPA refers to parameters that determine whether this area is capable of and suitable for cattle grazing but there is no analysis of the environmental consequences of that suitability that would allow the public to make an informed opinion on the action.

The identification of issues is only superficially discussed. The analysis of comments, the input from the interdisciplinary team, and the list of issue statements are speculative and are not supported by technical references, data, cited research, or monitoring. However, many of the issue statements acknowledge the potential of significant environmental impacts. The number and degree of impacts acknowledged in the identification of issues highlight the need for a complete EIS.

2. Significant potential impacts to Bi-State Sage Grouse

Additionally, the NOPA proposes:

"...the reconstruction of three water sources and the piping of water from those sources out of the riparian areas... Doing so would be inconsistent with the Toiyabe National Forest Land and Resources Management Plan as amended by the Bi-State Sage-grouse Amendment standard RI-S-06 requirements that livestock watering and handling facilities be located outside a 0.6-mile buffer of riparian areas... To ensure consistency... The proposed project-specific plan amendment would add the following to Bi-state Sage Grouse Amendment standard RI- S-06, 'This standard does not apply to the Bridgeport Southwest Rangeland Management Project (date of project approval).'"

This proposal sets a new loophole precedent for all grazing permittees that might want to avoid Sage Grouse protections and undermines the Forest Service's five-year EIS process to amend the 1986 Land and Resources Management Plan to protect Bi-State Sage Grouse. The amendment would allow cattle watering structures in the Dunderberg and Jordon Basin allotments and threaten Bi-State Sage Grouse in the Mono Basin and the Bodie Hills.

3. Conclusion

MLC objects to the revised December 2021 NOPA as it does not adequately address the Committee's concerns stated above nor concerns from previous comment letters (see attachments).

The proposed action's potential impacts to meadows and soils, riparian corridors and wet meadows, and wildlife, including the Bi-State Sage Grouse, endangered Sierra Nevada bighorn sheep and American pika, water quality, vegetation, recreation use, and wilderness values all require the preparation of an Environmental Impact Statement (EIS) where an analysis and range of alternatives may be thoroughly and objectively assessed.

Thank you for the opportunity to comment on the Humboldt-Toiyabe National Forest's Notice of Proposed Action for the Bridgeport Southwest Rangeland Project.