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Comments: Klitz Jan 2022 Bridgeport Southwest Rangeland Project #49993

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Thank you for the opportunity to comment on the Bridgeport Southwest Rangeland Project

#49993.

Comments

To cover in the EA:

1. Include a no-grazing (no change) Alternative to permanently close the allotments.

2. Include documentation by the best science in the EA.

3. The proposal calls for reconstruction of three spring-fed stockwater developments

on the Dunderberg allotment that had been used for decades to water sheep:

[ldquo]Reconstruction and use of stockwater facilities could de-water streams and

meadows.[rdquo] How does the removal of water from springs and meadows conform to

the regulation [ldquo]to retain hydrologic conditions in the developed spring habitat that

are similar to undeveloped reference habitats[rdquo]? [Guttieri 2020]. How will wildlife

needs for safe drinking and cover be met?

4. The [ldquo]Need[rdquo] for this proposal stems from a former permittee[rsquo]s lawsuit, which the

Bridgeport Ranger District settled in favor of that former permittee instead of

standing up for bighorn sheep, all other wildlife and their habitat as well as the

American public. How does this serve the American public?

5. [ldquo]The agreement also included a provision granting the permittee the right to submit

a new application for domestic sheep permits.[rdquo] After recognition in the Background

of the lethal affect that domestic sheep have on bighorn sheep, why is it now okay to

put domestic sheep near bighorns, an endangered species?

6. Describe the effects on the Bi-State sage grouse to the dewatering of springs and meadows.

7. Report the impacts of fences on wildlife, including mortalities, and on large mammal movements. How will sage grouse collisions with fences be avoided?

8. What is the method of calculation of available forage to determine the stocking rates in Table 3?

9. Compare the financial costs to the public with restocking and without restocking.

10. List the benefits to the American public of restocking.

11. Recovery of these allotments in the years since last stocked would be reversed. Vegetation, soil, and water parameters should measured since the allotments were closed.

12. Different years are used to describe the dates of allotment closures. Allotments were closed in various years between 2004 and 2014 [Background page 2], but on page 9, it states [ldquo]The National Forest System land within the project area have not been grazed by livestock since 2009.[rdquo] Explain this discrepancy.

13. The US Drought Monitor map shows Category 3 (Extreme Drought) in Mono County on Dec 30 2021. https://droughtmonitor.unl.edu/CurrentMap/StateDroughtMonitor.aspx?CA

a. Describe current and likely effects of drought on grass height and density.

b. What measures will be taken to conserve/enhance low water volume for aquatic species?

c. If grasses are dying in dry periods and/or temperatures are higher than normal, how will cattle be prevented from increased impacts in riparian areas?

d. Given that [ldquo]excessive livestock grazing and loitering in riparian meadows

and woodlands has resulted in loss of vegetative cover, compaction of soils, erosion and lowering of the water table[rdquo] how will this proposal conform to the Humboldt-Toiyabe National Forest Vulnerability Report 2011 (p.5)?

14. Map the areas of noxious weeds still present in past livestock-use areas.

15. What wildlife would be present or in greater numbers if livestock are not present?

16. How will water pollution be prevented?

17. How will Terms and Conditions be enforced?

18. Describe the schedule, location and methodologies of monitoring to be done and by whom.

Issues

Sage Grouse

Livestock grazing is likely to cause destruction of sage grouse habitat, largely by removing the herbaceous understory needed by the grouse for both food (forbs and insects) and cover, but also through trampling of sagebrush seedlings [Connelly et al. 2000]. The utilization of 30% to 45% leaves little to no herbaceous cover and food (grass and forbs). The May 15 to October 31 season of use would negatively impact sage grouse nesting and chick rearing. The Bodie area has one of the largest surviving populations of the Bi-State sage grouse and should receive the highest protection.

https://www.sierraforestlegacy.org/FC_FireForestEcology/TFH_ExcessiveLivestockGrazing.php

High Elevation

Cattle cause the removal of biomass, trampling and destruction of root systems, and replacement of wild grazers [Reid et al. 2013]. These effects are greater at higher elevations because of lower temperatures over longer times, so plants cannot recover. Meyers[rsquo] study [2012] shows that cattle grazing in the high elevation Sierra Nevada results in a significant increase in indicator bacteria (E.coli).

[ldquo]The rare and ecologically important vegetative communities found up and down the Sierra, such as riparian areas and high mountain meadows, evolved without the exposure and pressures of livestock grazing[rdquo] [Sierra Forest Legacy].

Economics

All recreational use produces many times the income from public lands ranching. Studies suggest that even passive-use values (non-fishing recreation) are at least equal to and may be several times greater than all recreation use values. [Alkire 2003]. Across the 11 western states, public lands ranching provides 0.06 % of the jobs and 0.04 % of the income [Power, 2002, Hudak 2010].

Credibility

In your background history, former sheep allotments were closed to protect bighorn sheep, being [ldquo]one of the major threats to the recovery of SNBS[rdquo]. And it also stated, [ldquo]The project area includes a small amount of designated critical habitat for the Sierra Nevada Bighorn Sheep (SNBS)[rdquo].

Yet you included the possibility of putting domestic sheep back into these allotments.

Public values, recreationists and habitat conditions and wildlife have changed since the Multiple-Use Sustained-Yield Act 1960 [ndash] 62years ago - and the National Forest Management Act of 1976: climate, human population increase, decrease (extinctions) in biodiversity, so that now 96% of mammals are humans and livestock, 70% of birds are poultry:

Guardian Graphic 2018

The 4% extant wild mammals have gained in value. Even the old excuse of economic stability does not hold because ranching and livestock crops bring in much less income to towns and counties than does tourism [Power 2002]. People want to see wildlife in

undamaged, pretty places.

The U.S. Forest Service is a public trust and should act accordingly.

Conclusions

The value of this public land is for wildlife habitat in a healthy montane ecosystem, not for private extraction. Wildlife brings in much greater income from tourism and should be held in stewardship for future generations. These allotments should be kept closed. There is no positive result for these public lands nor for the American public by permitting cattle on them.

References

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