August 4, 2019

Jan Cutts
District Ranger
Humboldt-Toiyabe national Forest
Bridgeport Ranger District
Bridgeport, Ca 93517

Submitted via email to: comments-intermtn-humboldt-toiyabe-bridgeport@fs.fed.us

Re: NOPA for the Bridgeport Southwest Rangeland Project

Dear Ms. Cutts,

Please consider these comments regarding the Notice of Proposed Action (PA) for the Bridgeport Southwest Rangeland Project.

I strongly oppose the Proposed Action to open the Dunderberg, Tamarack, Cameron Canyon and Summers Meadows Allotments to cattle grazing. This PA requires a much more thorough analysis which can only be accomplished in an EIS. The PA document draws many unsupported conclusions that the negative, significant and cumulative impacts of introducing cattle grazing to these important and sensitive lands on the Humboldt-Toiyabe National Forest (HT) can be adequately mitigated.

As a 35 year resident of Lee Vining I have enjoyed many years of hiking, backpacking, camping, skiing and studying natural history in this magnificent landscape with family, friends, local residents and visitors.

On June 7, 2018, I filed comments during the public scoping for this proposal and attach those comments for the record, as they provide additional detail on numerous points which I do not believe were adequately addressed in the PA documents. Please see those comments for more detailed descriptions of this unique and resource-rich landscape. Please see also photographs attached to this email and in separate email attachments that illustrate the grandeur and richness of this region.

I now offer these further observations and conclusions:

1. An EIS needs to consider that the vast majority of HT lands have been managed for decades in livestock grazing allotments at the expense of biodiversity, productivity, water quality and scenic and recreational values- contrary to the mission of managing for the overall health of our national forest system. The emphasis on managing for “rangeland” with narrow standards for satisfactory conditions has made for a steady erosion of ecological values which the HT deems acceptable, despite the spread of invasive plants, declines of sensitive, threatened and endangered species, the trampling, erosion and incision of meadows and stream banks (leading to declining water tables), pollution of water quality, loss of native

perennial grass and forb diversity, loss of recruiting willow and aspen seedlings (leading to senescence of these vegetation types) and long-lasting concentrations of livestock excrement- a not-complete list of significant impacts. These impacts are cumulative across the HT landscape and can be found near the allotments in question- for instance, on Eagle Creek, in Buckeye Canyon, Burt Canyon, Molybdenite Creek and the Sweetwater Range.

2. An EIS should acknowledge that the allotments in question are showing encouraging signs of recovery during several years rest from grazing. Conditions have changed significantly since these allotments were last reviewed. The allotments contain particularly complex but fragile high-elevation communities consisting of significant wetlands, abundant springs and streams, lengthy riparian corridors, sweeping groves of aspen, cottonwood and conifers, willow shrub lands and vast complex upland shrub habitats. The diverse ecosystems of plants, mammals, reptiles, amphibians, birds and insects supported here are benefiting from rest from grazing, too. These habitats are known to support or could support viable populations of American pika, aplodontia, Sierra Nevada red fox, winter range for Sierra big horn sheep, Bi-State sage grouse, willow flycatcher, yellow warbler, endemic butterflies and many other sensitive species. These resources should be allowed to continue to recover and baseline data should be collected and mapped, to document species and habitat diversity, abundance, quality and condition, and locations of invasive species. After years of recovery following cessation of domestic sheep grazing, what baseline data has been collected to document rangeland conditions? How can impacts be documented in a monitoring program without such information? When is the HT going to put natural resource protection above resource degradation? A No-grazing Alternative must be considered in an EIS on this PA.

3. The EIS must consider that the recreational and scenic values of the proposed allotments are exceptional and attract increasing numbers of visitors, year around, who enjoy a myriad of activities from sightseeing, photography, bird and butterfly watching, wildflower, fall colors and wildlife viewing, natural and cultural history education, painting, hunting, fishing, skiing, camping, backpacking and access to wilderness and Yosemite National Park. The HT must consider that the value obtained by the public of these public lands, along with the potential for recovery of diverse but threatened ecosystems far outweighs the narrow and questionable economic benefits of grazing. The limited management resources of the HT should be focused on the stewardship of these recreational and ecological values rather than on a detrimental grazing program. Please review the series of photos I have taken in each proposed allotment as examples of the stunning scenic views and botanical diversity I have enjoyed in explorations of the region.

4. The PA document acknowledges repeatedly that cattle will gravitate toward and degrade sensitive habitats. It suggests that this problem can be adequately mitigated with range riders and a few water tanks. Sensitive habitats, however, are interspersed across the proposed allotments. It is an unsupportable fantasy that the

trampling and over-grazing of vegetation and deterioration of water quality will somehow be avoided. An EIS must give a realistic assessment of the ability of range riders to manage cattle to prevent the kinds of resource degradation listed above. There is no way that a few cowboys can provide the day by day herding of cattle that will keep cows from congregating where water, shade and delicate forage is concentrated. Nor is exclusion by fencing a feasible alternative given the extensive richness of sensitive habitats across this landscape. Has the intended lessee or any lessees on the HT implemented such a cattle herding program? I doubt it. The season of use suggested is also unrealistic. In many years, snows linger well into the summer and conditions will be too wet to allow a grazing season of sufficient length. Meadow and understory vegetation need to be allowed to flower and set seed in order to prevent being out-competed by invasive species such as cheat grass. Disturbance of the soil by cattle grazing paves the way for invasive weeds to take hold. Throughout other HT grazing allotments it is clear that even rest/rotation management is inadequate to allow for rangeland recovery. The single visit monitoring proposed by the HT is completely inadequate for the task at hand. To then propose that cattle stocking rates can be doubled and monitoring cease altogether-that is a shocking abandonment of management responsibilities on the HT.

5. I do appreciate and support that the HT indicates it will drop Cattle Creek from the allotment boundaries. Is this because it is unrealistic to follow and control cattle through challenging landscapes? The PA states, however, that cattle will somehow avoid steep slopes, contrary to what is typically seen- livestock already roam unmonitored in allotments along the Sierra Crest. I witnessed that the lessee in question years ago allowed domestic sheep to stray way beyond allotment boundaries-nearly to the top of Mount Dana into Bighorn Sheep habitat.

6. Climate change is a real and significant concern in the Eastern Sierra. The analysis given suggests that the proposed allotments do not offer a significant sink for carbon in the region. This is an unsupported assertion. The biomass and stored carbon that is provided by the richness of plant communities and soils, especially if allowed to recover, should not be discounted. Furthermore, the discussion in the PA about climate change misses the point- this particular landscape on the HT, due to its east and north-facing orientation, significant elevational span from 8,000' to more than 10,000', abundantly-watered watersheds- provides one of the greatest opportunities on the HT to host important refugia for species adjustments to climate change. As the planet heats up, lower elevation species will shift their ranges upslope and higher elevation species will need unimpaired conditions to cope with increasing temperatures. The proposed allotments provide a bridge for migration and transition for native species across the Sierra Range into the Bodies and beyond. The integrity of the region should no longer be compromised, but instead be managed to higher standards. The HT in the EIS should propose an Alternative recognizing the value of this landscape as a Botanical Special Management Area, permanently retiring the grazing allotments, and actively managing for the ecological, watershed and recreational values that exist and are recovering here.

I respectfully request that the HT refrain from fast-tracking this PA and take the time to fully disclose in an EIS the significant and cumulative impacts of introducing cattle to this precious region. An Alternative must be developed which retires these allotments from all livestock grazing and actively manages for the region's significant biological diversity, resiliency in the face of global warming and for areas' superlative scenic and recreational resources.

Thank you for considering these comments.

Sincerely,

Ilene Mandelbaum
PO Box 89
Lee Vining, CA 93541
monogreens@aol.com

Attachments:

Cattle.HT.Scoping.Mandelbaum (June 7, 2018)

12 Photos: in this and two more emails:

Jordan Basin, October 8, 2018

Dunderberg Creek and Meadows, October 2, 2016

Summers Meadows, Cameron Canyon, Tamarack, May 29, 2018