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January 5, 2021

Aaron Coogan
District Ranger
Bridgeport Ranger District
HC 62 Box 1000
Bridgeport, CA 93517
Submitted online at https://www.fs.usda.gov/project/?project=49993

Re: Bridgeport Southwest Rangeland Project

Dear District Ranger Coogan,

Please accept these comments on the Notice of Proposed Action Bridgeport Southwest Rangeland Project from the Sierra Club Range of Light Group and Friends of the Inyo. We previously submitted scoping comments in June of 2018 and NOPA comments in August of 2019 highlighting the various significant and cumulative adverse impacts of this project. First and foremost, we would like the Humboldt-Toiyabe National Forest Service to support and abide by the 2012 Bi-state Sage Grouse (BSSG) Action Plan and not further amend the Forest's Land and Resource Management Plan (LMRP). The goal of the BSSG Action Plan is to prevent the decline of the BSSG to the point that it needs to be listed as a threatened or endangered species by restoring its habitat, eliminating threats, and providing for long-term viability through collaborative efforts. The Forest Service has spent millions of dollars towards these efforts. Until, and unless the LRMP requirements are proven ineffective, they should be followed. Any amendment to the LRMP requires a full Environmental Impact Statement (EIS).

The LRMP Amendment

The Forest Service went through a five-year NEPA EIS process from 2012-2017 to amend the 1986 LRMP to add protections for the Bi-state Sage Grouse. Per the Record of Decision written by Bill Dunkelberger, now the Forest Supervisor of the Humboldt-Toiyabe National Forest, the reason for amending the LRMP was to set "stronger management direction that removes the discretion present in the current plan and include standards and guidelines which will be used to protect habitat from activities, direct restoration of habitat, and move the habitat toward the desired conditions." The Bridgeport Humboldt-Toiyabe Forest Service staff signed off on the BSSG Action Plan and the amendment to the LRMP, knowing that the lessee wanted to use these allotments for cattle grazing per the 2015 settlement agreement. Now the Bridgeport Ranger District wants to provide an exception for watering structures that would be inconsistent with the management direction stated in the LRMP. It is inappropriate to make an exception to the rules for one lessee.

Watering Troughs in Riparian Areas

RI-S-06: *Livestock watering and handling facilities or sheep bedding grounds shall not be located within 2 miles of an active lek and 0.6 miles from riparian areas.*

The reason for this regulation is that cattle decimate the area around water troughs and break down the surrounding vegetation to bare dirt. There is a lek just less than 2 miles away from the proposed Dog Creek cattle trough and one that is 2.3 miles from it. There have been sightings of sage grouse along Monument Ridge which is a bit of a distance from any of the known leks. That might indicate that there are unknown lek, nesting, and wintering sites in the area and that the sage grouse spread out quite a distance. Sage grouse could be within 2 miles of an unknown lek or nesting area. They select for meadow and riparian edge for their broods to fatten up on insects. If the cows are also congregating around a water trough in the same area, they would destroy superior brooding habitat for the sage grouse.

There are riparian areas and springs throughout the Dunderberg and the Jordan Basin allotments. The LRMP amendment would allow a cattle trough in a riparian area in three locations. While the trough would keep cattle out of the stream, it would be within 0.6 miles of the stream or less (or there wouldn't be a need for an amendment) and they would probably be in a riparian zone. One trough is near Dog Creek, one is the Wilson Creek headwaters and/or the springs in the Jordan Basin area, and one is near the Kavanaugh Ridge. The Notice of Proposed Action (NOPA) does not explain what the source of the water will be so we can only assume it will come from Dog Creek, the Jordan Springs, and from the various springs along the Kavanaugh Ridge and that the troughs will be filled by gravity flow. However, there is no analysis in the NOPA regarding the impacts of this, which should be covered as part of an EIS.

Attached are photos to show the impact on cattle around a trough in a sagebrush steppe habitat. The area is completely bare around a cattle trough. Imagine a 130 foot diameter circle of bare earth in a riparian habitat. That would have a significant impact.

This NOPA doesn't provide sufficient locational information for the public to accurately determine and understand what losses in vegetation would be likely and which types of vegetation would be impacted. While it is better to have stock watering areas to keep cattle from negatively impacting streams, sacrificing riparian areas is not a better plan.

Design element SNFPA 119: *Do not locate new or relocate existing facilities that result in the gathering of livestock in meadow or riparian habitats.*

How can this be recommended when essentially the same requirement, RI-S-06, is being amended to be excluded? SNFPA 119 only strengthens the argument for not putting watering troughs in riparian areas. Both SNFPA 119 and RI-S-06 should be part of the Allotment Management Plan (AMP).

<u>Other Requirements that would be violated</u>
There are several directives in the 2017 Amended LRMP that would be violated in addition to the RI-S-06 requirement should cattle grazing be allowed on these proposed allotments.

AA-S-02: *Total anthropogenic disturbances shall affect no more than 3% of the total bi-state DPS habitat within 4.7 mile of active and pending leks in the Bodie / Mount Grant, Desert Creek/Fales and White Mountains population management unit boundaries.*

The proposed changes in the NOPA are in the Bodie management unit. Studies show that sage grouse nest, raise their chicks, and winter within that distance from their mating site. There are two known leks 2-3 miles from the proposed watering structures. Between the impacts from cattle grazing, wandering and trampling through the brush, and the impacts of adding watering structures, the disturbance caps will be exceeded and the sage grouse will decline.

AA-S-06: *Require site-specific project mitigation to insure no permanent net loss of habitat due to project disturbance.*

The presence of cattle will prevent sage grouse from using areas that they otherwise might/could use. While cattle and sage grouse can both share a sagebrush landscape, it is generally in large, wide-open sagebrush steppe. The landscape of these allotments is a mosaic of habitats interspersed with small grassy areas and a few large meadows. The sagebrush are in small patches within these allotments. The sage grouse will select the meadows to raise their broods. It will put the cattle and sage grouse together in the meadows. Cattle graze the meadows and grasses in between the shrubs, removing cover that the sage grouse needs. The number of cattle proposed would crowd out the sage grouse in their preferred habitat. This is a significant impact and there isn't a mitigation that can correct for this. Bringing in cattle would mean a degradation of prime sage grouse habitat.

RP-G-01: *In bi-state DPS habitat, consider closure of grazing allotments, pastures, or portions of pastures, or managing the allotment as a forage reserve as consistent with maintaining sage-grouse habitat based on desired conditions as opportunities arise under applicable regulations, where removal of livestock grazing would enhance the ability to achieve desired bi-state DPS habitat conditions.*

The Summers Meadow, Cameron Canyon, Tamarack, Dunderberg, and Jordan Basin allotments should be closed to grazing based on this requirement alone.

<u>Sage Grouse are in decline</u>
Of the entire Bi-state Sage Grouse population, the Bodie Hills Population Management Unit (PMU) is the largest and most consistent population in terms of numbers. It is the anchor population. The sage grouse and other species in that area have survived droughts for hundreds of years because of the high elevation and water sources. The high quality habitat of the Bodie Hills area needs to be protected to maintain an optimum state. While the Bodie Hills PMU is relatively stable, the other PMUs are in decline. The total population has declined 60.7% over the past 53 years and 36.9% in the past 17 years.

This proposal should consider the cumulative impacts on the Bi-state Sage Grouse of adding more cattle to the region on top of the existing cattle grazing on the adjacent BLM allotments to the east of the proposed allotments. The leks are in the BLM grazing allotments and the male sage grouse counts in those leks have been in decline. This should be a red flag that indicates livestock grazing impacts sage grouse:

- The lek in Lower Summers Meadow has dropped from 43 in 2015 to zero in 2021.
- The lek in Sinnamon Meadow has dropped from 19 males in 2015 to 2 males in 2021.
- The lek to the east of Sinnamon Meadow in the lower Virginia Creek area has dropped from 15 in 2015 to 7 in 2021.

These are precipitous declines that are being ignored. The main causes of these declines need to be identified before introducing another potential threat to the species. Further study is needed to find out where they are and why they have moved. In two recent gold exploratory drilling projects in sage grouse territory (Long Valley and Spring Peak), we went to the project sites to locate the drill pad locations. In the process, we found sage grouse use areas in the vicinity of known leks, that weren't known until we came across them. The use areas were areas with multiple piles of sage grouse scat, old and new, that could reflect alternate lek sites or wintering sites. This shows that while sage grouse have high fidelity to a site, they still move around within a general area.

According to the 2012-2018 Accomplishment Report, USGS does not plan to monitor the Bodie Hills population in 2022 or in 2023 (page 8). There would be no means to measure the impact of adding more cattle to the area. Cattle on the Forest Service allotments would take away more sage grouse habitat and narrow their options to adjust to climate change.

AMP Requirements

This NOPA also covers the requirements that will be incorporated into the Allotment Management Plan (AMP) for these new cattle allotments as well as a change to the LRMP. We have concerns with some of these requirements and would like to see more added to address problems that come with cattle grazing.

Fencing

This NOPA indicates there will be new fencing. Fencing is a problem for wildlife, especially for sage grouse. With the BSSG DPS LRMP Amendment, the regulation **AA-S-09** first states, "Do not authorize/install new fences unless necessary for safety or environmental protection reasons." Cattle grazing is not necessary for safety or environmental protection. By introducing cattle, the Forest Service is now introducing the need for new fencing to protect springs, riparian areas, and historic structures, as well as to separate cattle from adjacent private lands, and to create separate pastures. Sheep are kept together by dogs and a shepherd so there wasn't a need for much fencing. The existing fencing that is there separates the BLM allotments from the Forest Service allotments as they could be different lessees. New fencing is implied that needs to be detailed and assessed for its impacts in an EIS.

An EIS would address the following questions: How much fencing will be installed, what type, and where? Will there be new fencing to separate the three Summers Meadow, Tamarack, and Cameron Canyon pastures in the Cameron Canyon Allotment? Will there be new fencing to separate the Dunderberg Mine pasture from the Dunderberg Low pasture? How much new fencing will be constructed as residents and private property owners try to keep the cows out? Cattle break down stream banks turning streams into channels that no longer keep surrounding meadows wet. Will riparian areas, ponds, or springs be fenced off? Where are the historic structures that will be fenced off? How will cows drink water in the new Cameron Canyon Allotment if the riparian areas are fenced off? Are there water troughs there already? If not, then the cows will be in the streams.

A 1/6/20 BSSG Local Area Working Group presentation shows a brood and nest in the Cameron Canyon allotment. If anything, the LRMP should be amended to add nesting, brooding and wintering sites to the requirement that there be no fencing within 1.2 miles of a lek. Sage grouse can fly into a fence at any time of the year.

AA-S-10: *To reduce bi-state sage grouse mortality, remove, modify, or mark fences in sage grouse habitat based on nearest proximity to lek, lek size, and topography where fence densities exceed 1.6 miles of fence per section (640 acres)*.

All existing fencing within sage grouse habitat and should be flagged, not just 1.6 miles within 640 acres. Fencing is a problem near nesting, brooding, and wintering areas too. Flagging fences only reduces sage grouse mortality, it doesn't eliminate it.[1] Flagging fails to prevent 43% of sage grouse collision mortalities.

RI-G-01: *Authorize new water development for diversion from spring or seep source only when habitat would benefit from the development. The intent of this guideline is to move toward desired habitat conditions when restoring habitat or mitigating disturbance.*

This NOPA indicates there will be diversions to fill the water structures as was done when sheep were grazed there. That was in 2004. Diversions to a trough would not be for the benefit of the habitat. Wetlands are more precious now with climate change. Springs will be tapped to fill the water troughs at the Kavanaugh Ridge and the Jordan Basin that have been supporting wetlands. The NOPA does not analyze the loss of spring water freely flowing and the adverse impacts to the vegetation that it supports. Springs have unique water chemistries - which differ from stream water - that support different plants and animals that contribute to the state's biodiversity.

The source of the springs may be protected by an exclosure, but exclosures usually fence off an extremely small area. Cattle severely damage the vegetation on the outside of the fencing. Fencing also prevents some animals from drinking from the spring. Given the importance of wetlands and the need to protect wetlands with climate change, these springs cannot be sacrificed to cattle.

Herding: range riders will be used to move the cattle during the grazing season.

How often will they be herding and moving the cattle? How will they keep cattle out of the riparian areas and out of the streams? Will they be out there 24/7? If the range riders are only there from time to time, then cattle will roam and congregate in the riparian areas, the streams, the lakes, the springs, and in the alpine meadows where they shouldn't be. Without adequate and consistent attention, the cattle will not be properly managed and sensitive habitats will be damaged.

Proposed Pastures and Acreages by Allotment: three pastures each for a Cameron Canyon Allotment and a Dunderberg Allotment for a total of 16,458 acres.

Thank you for eliminating Cattle Creek from the Tamarack pasture and for shrinking Summers Meadow. Cattle Creek is a popular hike. Hikers and campers will greatly appreciate not having cows walking into the campground and will enjoy seeing nature at its best.

The terrain of these allotments is not typical "rangeland." It ranges from 7,000'-12,386'. The proposed Dunderberg Allotment starts at about 8,600'. The proposed Cameron Canyon Allotment starts at about 7,200'. The terrain becomes steep quickly and there are slopes with gradients of 40 degrees or more that are inappropriate for domestic cattle grazing. There are acres within these allotments that

[1] Van Lanen, N. J., A. W. Green, T. R. Gorman, L. A. Quattrini, D. C. Pavlacky Jr. 2017. Evaluating efficacy of fence markers in reducing greater sage-grouse collisions with fencing. Biological Conservation 213: 70-83.

are covered in Tobacco Brush and Serviceberry shrubs and impassable. There are dense sections of sagebrush and bitterbrush with little grasses or forbs in between. The vegetation is sparse on the upper parts of the peaks. The high alpine meadows should not be grazed at all. As is pointed out in the NOPA, the cows will naturally not graze these areas. However, they wander and go where there are springs and lakes, including alpine lakes. They will be there, but shouldn't be. Grasses are slow to recover at high elevations and it takes sparse forage away from wildlife including Sierra Nevada Bighorn Sheep. Realistically, the grazing areas are the flatter meadows and that would be where the streams and seeps are, where the cattle should be excluded. Take those areas away and there is insufficient forage left to support cattle grazing.

If cattle are not excluded, then we will lose the precious biological and ecological values of the meadows. Meadows help store and regulate water, support wildlife, provide ecological services, and are beautiful when not grazed. Meadows that are not grazed have more flowers and grasses and more variety. With that come more insects, pollinators, and more food at the bottom of the food chain. Livestock compact soils to the point where the meadows no longer hold water and no longer sequester carbon. For example, after 100 years of sheep grazing in Tuolumne Meadows, the meadows are severely compacted.[2] They have dried up, the sedges and wetlands have shrunk in size, and the Lodgepole pines are encroaching from edges. Cattle also change the composition of vegetation by selectively eating some plants (e.g. sedges, timothy, aspen shoots) and not others (e.g. iris). We are losing the battle to save these iconic meadows. We lose biodiversity this way and resilience for other species to persist.

We don't agree with the statement in the NOPA in response to public comments, "Grazing management under the proposed action…would preclude notable adverse impacts across the allotments." This is not supported by science. While grazing is a way to maintain a meadow, the grazers could be deer, bighorn sheep, or pronghorn instead of livestock. The meadows look healthy now and don't need to be grazed to maintain that healthy state. Fire is also an alternative to managing a meadow. The Tribes could do control burns there as needed.

Proposed Livestock Grazing Use: a total of 800-1,293 HM from May 15-Oct 31.

The target permitted use of 800-1,293 cow/calf pairs is too high. Apart from the Upper Summers Meadow and the Sinnamon Meadow, the meadows in these allotments are small; big enough to support wildlife, but would be severely degraded by 800+ cattle. Cattle will congregate in the wet and cooler areas that are the most easily destroyed: the streams, the tarns, the aspen groves, and the willows, etc. Reducing AMUs does not change the distribution on the land. The same number of cattle will still congregate in the wet and cooler areas.

Bringing the cattle onto the land in mid-May through October when the sage grouse are nesting and raising their chicks will negatively impact sage grouse population numbers. These dates overlap with the critical disturbance period for sage grouse, which is from March 1-June 30. However, brood rearing extends into September. So, the adverse impacts will extend through September. It is important to know where the sage grouse use areas are and to keep the cattle out of them. However, that can only be achieved with fencing and fencing, even if flagged for the sage grouse, introduces a significant threat to sage grouse and other wildlife.

[2] https://sites.warnercnr.colostate.edu/davidcooper/tuolumne-valley-hydrology-vegetation-yosemite-national-park/

Proposed proper use criteria for management of livestock grazing: to use percentages by community type instead of forage height.

While percentages by community type may work for someone evaluating conditions at the end of a season, it is not a good method for determining when and where to move the cows during the season. Not setting a minimum height restriction for forbs and grasses can lead to overgrazing and eliminating cover for the sage grouse. Seven inches is the recommended height to provide adequate cover for the sage grouse from predators. It is easier to see when forbs and grasses are a certain height than figuring out when the upland herbaceous utilization reaches 45 percent in Mountain Big Sagebrush communities, 35 percent in Wyoming Basin Gig and black sagebrush communities, 30 percent in early seral state meadows, and 40 percent is late seral state meadows. What would the range riders use as a baseline to compare against to judge percentages? How does one measure 20% disturbance to a streambank when the stream shrinks from spring to fall? Please add a 7" height minimum to the AMP requirements in addition to the percentages. Also add a simple buffer distance from shorelines and streambanks that could be easily used in the field. You have to assume the range riders may not be trained range managers.

SNFPA 103: *prevent disturbance to streambanks and natural lake and pond shorelines caused by resource activities from exceeding 20 percent of stream reach or 20 percent of natural lake and pond shorelines*. This requirement will be considered for the AMP.

We recommend that this proposed criteria be included in the AMP and that it should apply to all ponds, lakes, and streambanks; not just ones with Yellow-legged frogs. This NOPA states that "Properly managed grazing could maintain soil and streambank stability while increasing the vigor and diversity of aquatic and riparian plan and wildlife communities." But these conditions are not what is commonly observed in areas grazed by cattle. What is the science to back up that statement?

There is an alpine lake along the Kavanaugh Ridge that could be impacted by cattle. Cattle wander. It isn't clear how often a range rider will be out on the range in the project area. If it isn't 24/7, then there's a chance for the cattle to end up at the alpine lake. Will fencing be used to prevent damage to the shoreline of this alpine lake?

There is also a tarn in the Dunderberg allotment that could be impacted by cattle. It is at the end of Forest Service Road 32020E that follows a ridgeline, parallel to the Virginia Lakes Road. To comply with the SNFPA requirement 103, this pond would need an exclusion. An exclosure would block wildlife from this water source as well. There is a second tarn further down the ridge, which may be on BLM property, but should be considered for possible foreseeable adverse impacts.

Design Element for Yosemite Toads and Yellow-legged Frogs: *To protect Yosemite toads, exclude livestock from standing water and saturated soils in wet meadows and associated streams and springs occupied by Yosemite toads or identified as "essential habitat" in the conservation assessment for the Yosemite toad. This design element would apply only during the breeding and rearing season (June 1 or for more than 2 weeks following snowmelt).*

Cattle are notorious for standing in streams and in wet meadows, causing damage to meadows when they are wet and mucking up streams with their excrement and footsteps. This is a problem for all wildlife and the ecosystem, not just to the Yosemite toad and Yellow-legged Frog. This design element needs to be much broader. It should apply to all streams at all times and to all wet meadows according to the broad objectives set for riparian areas in the 2004 SNFPA ROD. Riparian Conservation

Objective #1 states: *Ensure that identified beneficial uses for the water body are adequately protected.* Riparian Conservation Objective #2 states: *Maintain or restore: (1) the geomorphic and biological characteristics of special aquatic features including lakes, meadows, bogs, fens, wetlands, vernal pools, springs; (2) streams, including stream flows…*

All the streams flowing through the allotments eventually flow into Virginia Creek and then into the Bridgeport Reservoir, which already exceeds Lahontan Regional Water Quality Board standards for bacterial content. The NOPA says water quality was addressed (page 15), but it isn't. It just says these streams currently meet state standards. They might not meet standards with 800-1,293 more cow/calf pairs on these allotments contributing "nutrient load" to it, i.e., e-coli. That nutrient load might make it downstream to the Bridgeport Reservoir as well. The lower BLM sections of Dog Creek and Virginia Creek are under study for eligibility as Wild and Scenic River designation. Increased sedimentation and nutrient load upstream would disqualify them. According to the 1986 Toiyabe LRMP, Dunderberg Creek is a target for reintroducing Lahontan cutthroat trout. Trout require clean, fresh water.

Design Element for White Bark Pines: Reduce impacts to Whitebark Pine—when detrimental effects are identified.

The plan is to allow cattle in areas with White Bark Pines and to wait until there are visible signs of impact before changing the AMP. That is too late. Cattle compact the soil and will cause damage to the stands of White Bark Pines. These areas must be excluded at the onset. There is no reason for the allotment boundaries to go to the ridgelines except to use them as natural barriers. Unless there is extensive new fencing constructed, cattle will end up there.

Design Element for Tribally Important Plants: there will be scheduled botanical monitoring based on a CA SHPO memo dated May 13, 2020.

It is unlikely that the important plants will be monitored to the degree needed to allow proper growth. For example, willow is one of the traditional plants used by Tribes in these allotments. Cattle eat the leaves on willows up to 3-4 feet from the ground and change the natural growth pattern. So how are cattle going to be kept out of the willow stands? How do the Tribes find the yampah roots if the stems have been broken off from cows grazing in the meadows? How can the Tribes use the wild onions along a stream if the cows have trampled them?

<u>Unaddressed concerns to be considered for the AMP</u>
Will cattle be moved from one allotment to the other and cross Green Creek? Green Creek is eligible for a Wild and Scenic River designation. Will cattle be moved from the Jordan Basin pasture to another and cross Virginia Creek? Best management practices describe specific crossing spots that are reinforced to protect the stream and the banks. This should be added to the proposed design elements for the AMP in the case they will be moved.

Cattle often follow each other in a line and create trails and use the roads. Trails then channel rainwater and snowmelt, causing erosion on the hillsides. How is erosion being addressed? Who is paying for repairs to the Forest Service roads if they are eroded?

Fortunately, invasive species have not gotten a large foothold in these allotments. Cheatgrass and other noxious weeds are present, but in small areas that look like they were old bedding circles. There is plenty of cheatgrass nearby, however, in the BLM allotments in old sheep bedding circles and in a

recent burn area to provide seed source. Livestock are a vector for spreading cheatgrass, which will only get worse with cattle moving through. Now there are a variety of native grasses. That would change with grazing, trampling of the native vegetation, and soil disturbance allowing cheatgrass to move in.

Cheatgrass is a huge problem across the west. It has little nutritional value and can only be eaten during the short time it is green. It burns readily and increases the frequency of wildfires. These allotments are adjacent to and in designated wilderness. Cattle could track it into the wilderness since they can wander there. It should be one of the highest priorities to keep cheatgrass out of the wilderness. The proposed AMP regulations to prevent the spread of cheatgrass is to bring in the cows while it is still tender. However, cows are the vector. If there weren't cows, then there wouldn't be a rapid spread of cheatgrass. If cows were used to attack this problem, then only a small number would need to be brought in at a specific time and location and then hauled away when the cheatgrass turns brown. They would still need to be contained and kept away from sage grouse leks as it would overlap with the sage grouse mating and early nesting season.

This terrain is also habitat for the American pika, a near threatened species per the IUCN. Its population is declining. Field surveys by Connie Millar, USFS senior research scientist, show that American pikas are present in the Dunderberg, Jordan sub-unit, and Tamarack allotments. Cattle reduce the food source for pikas around their talus slopes and their supply source for their haystacks. Exactly how will properly managed grazing help this species? Is the plan to keep the cattle out of the pika areas or is it to move the cattle along before they overgraze the grasses?

What butterflies use the meadows in the allotments? How will they be protected and allowed to co-exist? A butterfly study should be conducted. There may be sensitive species of butterflies present in the project area. A recent butterfly study was conducted on Conway Ranch that revealed that a species of concern, the Apache Fritillary butterfly, relies on the Northern Bog Violet in the wetlands downstream of a spring as its host. Fritillaries have been observed in the project area.

Nothing in the NOPA mentions how the lessee or the range riders would address the presence of bears or meso-predators. Will they be sacrificed for the cattle? Coyotes, bobcats, and mountain lions are critical to an ecosystem and should be allowed to pass through or move into this area. This area is a key section of a wildlife corridor between the Sierra Nevada, the Bodie Hills, and the public lands in Nevada. Figure 2.7 of the 2010 California Essential Habitat and Connectivity Project identifies the passage from the Bodie Hills to the Sierra Nevada as essential. Figure 3.11 identifies it as a critical and essential habitat. This linkage will be more and more important as our region and the planet heat up. It must remain a safe passage for meso-predators and with access to water. That would need to be addressed in the AMP—no shooting or killing of coyotes, foxes, bobcats, or mountain lions unless they are actively attacking a calf or a cow.

Climate change cannot be ignored. It must be factored into the decision to allow cattle grazing or not.

<u>An EIS is required</u>

The proposed action in this notice recommends changing the LRMP to allow cattle troughs for stock water in three grazing allotments. It anticipates that the environmental analysis for the Bridgeport Southwest Rangeland Project will justify cattle grazing on this sensitive ecosystem. Based on the science and field research presented and referenced in the 2019 public comments and the public comments submitted with this NOPA, it is clearly not a foregone conclusion that cattle grazing will be beneficial for the environment, the sage grouse, or the riparian habitats associated with this project.

The environmental analysis that is being prepared will need to prove that cattle are an appropriate use of the land *first* in order to justify an amendment to the LRMP that would follow. While the amendment would be a single sentence to the LRMP, it sets a precedent for allowing exceptions to the rules; exceptions that could degrade the environment to support a special interest. This makes it more significant than the one sentence implies.

This notice also includes a list of requirements that would be included in an allotment management plan (AMP) for the proposed grazing allotments. The AMP requirements introduce a number of concerns regarding impacts of cattle on this landscape. The NOPA lacks maps that show where the sage grouse use areas are and which riparian areas, springs, tarns, and lakes will be off-limits and newly fenced. To determine that, further studies may be needed. We believe an Environmental Impact Statement is required to address the many impacts that cattle will have on this landscape. It would also include more details as to the effectiveness of the proposed management requirements.

<u>In Summary</u>
We can appreciate how hard the Forest Service is working to make cattle grazing compatible with other resource objectives such as wildlife habitat, recreation, and minimizing impacts from climate change. However, cattle grazing really isn't compatible with any other uses, especially with a future climate that will make it very difficult for wildlife to survive, let alone thrive. It seems inappropriate if the only way to proceed with a cattle grazing project is to impair riparian areas and degrade sage grouse habitat.

The 1986 Toiyabe LRMP sets the management directive for the Walker Management Area on adding the Hoover Wilderness and "*In the remainder of the management area, emphasis will be directed toward the amenity values of wildlife, dispersed recreation, developed recreation, and water quality in the major canyons and along the highways.*" This part of the LRMP has not been amended in the succeeding years. Under the Riparian Section on page IV-42 it states, "*Give preferential consideration to riparian area-dependent resources over other resources in cases of unsolvable conflicts*."

We question the interpretation of USFS policies that allow grazing at the expense of other appropriate uses that would better serve the public trust, especially in the face of climate change. USFS policies, the 1986 LRMP, the 2004 SNFPA ROD, and the 2011 Climate Change Vulnerability Report, backup a no-grazing option. They are policies based on the science of healthy meadows, climate resiliency, and wildlife habitat. The 1986 Toiyabe LRMP and the ROD for the 2004 SNFPA prioritize the health of riparian, meadow, and aspen ecosystems over grazing. One of the "Responsive Actions to Climate Change" in the Humboldt Toiyabe NF Vulnerability Report of 2011 is to reduce stressors such as grazing in critical habitats and to "Maintain or restore riparian, floodplain, and wetland conditions and connections with streams…Minimize hot season livestock grazing" and more. This area should be protected and preserved as a climate refugia, a botanical and wildlife special management unit, or an Area of Critical Environmental Concern (ACEC). The negative effects of cattle grazing far outnumber the benefits to an ecosystem and to the public.

Thank you for this public scoping period. Working together we can come up with a better end product.

Sincerely,

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Google Earth image of a cattle trough with bare dirt 30 feet to the left and 100 feet to the right of it.