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January 4, 2022

Aaron Coogan
District Ranger
Bridgeport Ranger District
Humboldt-Toiyabe National Forest
HC 62 Box 1000
Bridgeport, CA 93517

Submitted electronically to: https://www.fs.usda.gov/project/?project=49993

RE: Notice of Proposed Action for the Bridgeport Southwest Rangeland Project

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.

<u>No alternatives and insufficient environmental analysis</u>

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.

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.

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. Please contact me at (760) 647-6595 ext. 121 or *bartshe@monolake.org* if you have any questions or would like to discuss further.

Sincerely,

Bartshé Miller
Eastern Sierra Policy Director

Attachments:

- August 5, 2019 Mono Lake Committee comment letter on the Notice of Proposed Action Bridgeport Southwest Rangeland Project
- June 7, 2018 Mono Lake Committee comment letter on the Humboldt-Toiyabe Bridgeport Southwest Rangeland Project

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August 5, 2019

Ms. Jan Cutts
District Ranger
Bridgeport Ranger District
Humboldt-Toiyabe National Forest
HC 62 Box 1000
Bridgeport, CA 93517

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

RE: Notice of Proposed Action Bridgeport Southwest Rangeland Project

Dear Ms. Cutts:

The Mono Lake Committee (MLC) provides these comments on the Humboldt-Toiyabe National Forest's Proposed Action (PA) 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. 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 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.

We appreciate the Humboldt-Toiyabe's attempt to apply specific management strategies to protect these high elevation meadows and protected species (Sierra Nevada bighorn sheep, American pika, Bi-state sage grouse, Yosemite toad, and Sierra Nevada yellow-legged frog), but we continue to conclude that these areas are not appropriate for cattle grazing leases.

MLC's process recommendations

In June the Bridgeport Ranger District (BRD) released a Notice of Proposed Action (NOPA) which is "to authorize cattle grazing within portions of the Dunderberg, Tamarack, Cameron Canyon, and Summers Meadow allotments and

to stipulate the management actions, terms, and conditions under which cattle grazing would be permitted." (Note: The Dunderberg allotment includes a separate allotment referred to as the Jordan Basin Unit, which is in the Mono Basin watershed.) The NOPA is a departure from our previous understanding that the BRD would prepare either an Environmental Impact Statement (EIS) or a finding of no significant impact (FONSI) for the Project. MLC believes that due to the numerous adverse impacts—and the fact that cattle have never been authorized by the Forest Service to graze on these allotments—this project requires a full EIS.

In our 2018 comment letter (see attached), we requested that additional alternatives be developed to represent a broader range of actions, specifically ones that reduce allotment size to protect sensitive habitat areas and water resources. While we appreciate the effort that was made to reduce allotment size, no new alternatives were developed for the PA and the current choice is to either support authorization of cattle grazing on these allotments or not, which we believe constitutes an inadequate range of alternatives. As a result of the impacts described below, MLC does not support the PA to authorize cattle grazing.

Allotment boundaries and pasture configuration

While we appreciate the modifications made to the previous allotment boundaries, the revised allotments still contain sensitive vegetative habitat not appropriate for grazing cattle. These high elevation meadows contain seeps, springs, and numerous seasonal creeks. The Jordan Basin Unit in particular has not been grazed since 2004 and the soil and vegetation recovery is clearly visible. Introducing cattle to this area will reverse this recovery.

These areas are important for wildlife, especially winter forage for endangered Sierra Nevada bighorn sheep. It would be impossible to fence all of these sensitive areas so that cattle could not impact them, and in fact the PA does not call for such measures. On the contrary, the PA does not require any new fencing to be constructed and proposes reliance on "range riders" to control the cattle and exclude them from specific areas. This approach seems unreliable at best and given the diverse and growing recreational use in the area, user conflicts are likely to occur.

Livestock grazing flexibility

We appreciate BRD's attempt to tailor cattle grazing to these sensitive allotments through the proposed grazing management strategies. However, we believe they are problematic because they appear to be management intensive. Who decides how to "vary the time of year livestock are in any one unit?" Who enforces "limiting the amount of time cattle are in any area so as to minimize the impacts of grazing regrowth?" Who decides what is "adequate time for growth prior to grazing or for regrowth after livestock have been removed?" Who enforces prohibiting "multiple entries into a given pasture within a season except for trailing?" In general, is the BRD establishing specific management directives for the proponent at the beginning of each grazing season and then monitoring for compliance? Or is the permittee responsible for adhering to these guidelines? What is the frequency with which the BRD will be monitoring compliance to these guidelines? Once again, the complexity of the overall management requirements seem to be

labor intensive for the BRD and we are concerned that budgetary constraints will restrict the BRD in their ability to monitor for desired compliance.

Livestock grazing infrastructure

Currently the allotments have eight miles of existing fence (not enclosing any one allotment). As stated before, the PA authorizes the permittee to use "range riders" to both control the herd and move the herd between allotments. The PA states that "the success of using range riders will be monitored, and if additional fences (and cattle guards) were required, the following siting and design criteria would be employed…" The PA then goes on to list various measures that would be implemented if additional fences were necessary. MLC has the following questions:

1. What is the threshold for determining if additional fences are necessary?

2. Will there be another opportunity to comment if it is decided that all the allotments needed to be fenced in since botanical, archaeological, and wildlife surveys will then be required and completed? And will the BRD conduct a subsequent environmental analysis to determine the impact of fences on these resources?

3. How will recreational uses in the allotment areas be accommodated with fences?

Monitoring and adherence of desired conditions

The PA states that "the frequency and intensity of monitoring on each allotment may vary over time" and that "monitoring would initially be completed yearly, though it may be less frequent once the BRD was satisfied that the permit terms and conditions were being implemented, that proper-use criteria were being met, and that the project area was maintaining or progressing toward desired conditions."

MLC does not support this approach. We are concerned that with so many management strategies (see above) that the permittee must comply with that are contingent on pre-season range health and management during the grazing season, annual monitoring (or worse, less than annual monitoring) will not be sufficient to ensure meadow health, long-term protection of riparian areas and ongoing protection listed and sensitive species

High elevation meadows and soils

Allotments under consideration for this Project are between elevations of approximately 8,000–10,000 feet above sea level. Many of the allotments, such as the Jordan Basin Unit, have steep slopes. MLC is concerned that cattle grazing will cause increased erosion of these slopes, exacerbating multiple water runoff and water quality issues. Additionally, high elevation meadows are fragile and cattle trample soil, causing compaction, which contributes to increased soil erosion.

Riparian corridors and wet meadows

The Project's high elevation allotments contain headwater seeps, springs, and creeks as well as sensitive lands adjacent to wet meadows and riparian areas. These areas are important water sources for wildlife, birds, and sensitive native plant species, and MLC has concerns about grazing impacts on these areas if measures proven to keep cattle away are not specifically outlined and implemented. Wet meadow habitat found in the Jordan Basin Unit is widespread and not easily contained due to challenging terrain. The proposed Project does not outline specific ways these habitats will be protected.

Wildlife impacts from cattle

Domestic sheep grazing has not occurred on the Project allotments for at least five years, and more in the Jordan Basin. The US Forest Service responded to the issue of the proximity of domestic sheep to Sierra Nevada bighorn sheep by letting existing sheep grazing permits expire. MLC supports the decision by the US Forest Service to protect endangered Sierra Nevada bighorn sheep from possible fatal disease transmission from domestic sheep.

The prior domestic sheep grazing permittee is requesting to graze cattle on these allotments. Cattle have never been permitted on these allotments, and therefore these allotments must now be evaluated for impacts associated with a different type of livestock. Since a significant amount of time has passed since the sheep grazing permits were allowed in these areas, wildlife studies need to be updated.

Sierra Nevada bighorn sheep

The Sierra Nevada bighorn sheep recovery plan identifies habitat critical for this protected species' survival. The Mt. Warren herd of bighorn sheep overlaps the Jordan Basin Unit and the Dunderberg allotment.

MLC has long been involved in supporting efforts to protect and restore Sierra Nevada bighorn sheep to their historic range. The species was released into lower Lee Vining Canyon in winter 1986 and they have occupied the area ranging from Lee Vining Canyon to north of Dunderberg Peak since then. The Sierra bighorn are an essential part of ecological fabric of the Mono Basin.

MLC is concerned that cattle grazing will reduce available low-elevation winter forage for Sierra Nevada bighorn sheep. The 2007 Sierra Nevada bighorn sheep recovery plan emphasizes "safe access to preferred habitats, notably winter ranges" and that "recent declines in population sizes have been linked to the decreased use of key resources on winter ranges." The California Department of Fish & Wildlife (DFW) recovery plan concludes that "A basic premise of the recovery strategy, therefore, is to reduce factors that inhibit the ability of Sierra Nevada bighorn sheep to utilize all components of their habitat."

DFW has identified a direct correlation between healthy low-elevation forage areas and reproductive success—making these forage areas a vital component for population recovery. The

recovery plan states: “Increased use of low elevation winter ranges will increase nutrient intake and thereby enhance reproductive output and success. Increased low elevation winter range use will also decrease mortality associated with the use of high elevations during severe winters.”

Given the potentially significant impacts to Sierra Nevada bighorn sheep alone, the MLC strongly recommends that grazing allotments should not be considered for approval.

Bi-state sage grouse

The Jordan Basin has suitable sage grouse habitat and should be analyzed for potential grazing impacts, especially near wet meadows which are preferred summer brood rearing locations for the species.

Also in relation to sage grouse, the Project proposes to keep 8 miles of existing fence with the option of constructing more if needed to control the cattle. Fencing is well-documented as problematic for sage grouse in terms of both predation opportunities and collision hazards. Adding more fencing in areas known to currently have sage grouse—for example, Summers Meadow—and in suitable habitat within the Project must be analyzed for these specific impacts.

American pika

The gray-headed pika, a subspecies of the American pika, can be found in and adjacent to these allotments. Grazing impacts to pika have been well documented by Dr. Constance Millar, Senior Scientist, USDA Forest Service in the paper *Influence of domestic livestock grazing on American Pika (Ochotona princeps): Haypiling Behavior in the Eastern Sierra Nevada and Great Basin*. This study shows that grazing can impact pika populations by reducing available forage for haypiles in forefields, specifically: “Lack of abundant, diverse, and nutritional forage for direct and stored consumption might lower overall fitness of pikas. Similarly, lack of adequate fellfield vegetation appears to force pikas to move high in the talus to find alternative food, exposing them to potentially less favorable thermal conditions in summer as well as in winter.”

Pika have been documented in the Jordan Basin Unit and are present in the other allotments as well.

Other wildlife

Almost all of these allotments provide essential wildlife habitat in a time of increasing habitat fragmentation. The Jordan Basin, Dunderberg, Cameron Canyon, and Tamarack allotments all have diverse areas that support a wide variety of wildlife and bird species. A comprehensive inventory should be done in order to fully analyze impacts from cattle grazing. Some sections of these allotments provide essential habitat refuge—which is especially important within the context of documented climate change impacts. Preserving intact, healthy natural areas will better serve public land managers tasked with species protection and maintaining functioning ecosystems now and in the future.

Water quality impacts

Grazing almost always impacts water quality, whether impacts are localized or in down-system creeks and lakes. Bridgeport Reservoir has been experiencing serious water quality issues related to grazing, and the Lahontan Regional Water Quality Control Board has been working with the ranching community for many years to find ways to address the problems.

Because the Project allotments are in high elevation areas, the water quality impacts may be more dispersed but nonetheless still exist. It is not clear from reading the Project description how the cattle will be watered or what type of access they will have to springs, seeps, and creeks. Grazing cattle is different than grazing sheep. With sheep, grazing management plans often require shepherds to control animal access to sensitive water areas. The Project does not outline how the cattle will be controlled, or how sensitive water areas will be protected.

Another important component to negative impacts on water quality is the effect on people who recreate in these areas. The Virginia Lakes to Twin Lakes corridor is already very popular for dispersed camping, hiking, backpacking, birding, fishing, and hunting. Many of these activities take place away from public amenities and users need reliable water sources; there must also be a plan for notifying the public of potential health impacts to water quality.

Vegetation

As mentioned above, cattle impact soil structure and health by trampling and compacting the soil. Since the Project allotments are above 8,000 feet, the vegetation is sparse, delicate, and easily damaged. MLC recommends baseline vegetation studies for each allotment to document pre-grazing health.

As native plants are damaged and areas of bare soil exposed, invasive plants such as cheatgrass move in and outcompete native vegetation. Cheatgrass is already established at least as high as 8400-8600’ in the Jordan Basin. Climate change, reduced snowpack and warmer winters are moving cheatgrass higher at a rapid speed and impacts from cattle will further accelerate this change. The BRD should analyze and quantify the impacts and potential spread of cheatgrass in these areas.

Recreation

The Virginia Lakes to Twin Lakes corridor and surrounding areas are very popular recreational areas and diverse recreational use has been increasing exponentially in recent years. User conflicts arising from grazing and recreational activities occurring in the same area and at the same time seem highly probable. MLC urges the BRD to study potential recreational use conflicts and to outline a comprehensive visitor information outreach plan.

US Forest Service lands continue to experience the strain of multiple demands and competing activities. All of the Project areas under consideration for cattle grazing are extremely popular recreational areas. People camp, hike, backpack, bird watch, fish, hunt, and relax in this unique and easily accessible area. It is plausible that cattle could stray from “range rider” control and

wander into the Twin Lakes and Virginia Lakes recreation areas. We urge the US Forest Service to differentiate and separate uses more to avoid user conflicts.

Wilderness

Portions of some of the allotments are in designated Wilderness, and several are adjacent to Wilderness areas. The PA acknowledges that "there is potential for impacts on wilderness character due to human activity and livestock use." MLC believes that the BRD must analyze the impacts of the proposed cattle grazing in relation to the Wilderness areas. The BRD must also combine that with the overlay of a very popular wilderness area and user expectations of a "wilderness experience," since livestock grazing affects the experience of Wilderness users.

Conclusion

Because of the negative impacts of cattle grazing to high elevation meadows and soils; riparian corridors and wet meadows; wildlife, including Sierra Nevada bighorn sheep, Bi-State sage grouse, American pika, and more; detrimental water quality effects; native vegetation; recreation; and the wilderness experience, MLC does not support the Bridgeport Southwest Rangeland Project. If the USFS proceeds with the project we believe the potentially significant impacts on threatened and endangered wildlife, the area's extensive riparian areas, water quality and soils and recreation require that the agency prepares an EIS.

Thank you for the opportunity to comment on the Humboldt-Toiyabe National Forest's Notice of Proposed Action for the Bridgeport Southwest Rangeland Project. Please contact me at (760) 647-6595 or *lisa@monolake.org* if you have any questions or would like to discuss further.

Sincerely,

Lisa Cutting
Associate Policy Director

Attachment:

- June 7, 2018 Mono Lake Committee comment letter on the Humboldt-Toiyabe Bridgeport Southwest Rangeland Project

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June 7, 2018

Ms. Leeann Murphy
Acting District Ranger
Bridgeport Ranger District
Humboldt-Toiyabe National Forest
HC 62 Box 1000
Bridgeport, CA 93517

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

RE: Public Scoping Notice for the Bridgeport Southwest Rangeland Project

Dear Ms. Murphy:

The Mono Lake Committee (MLC) would like to provide comments on the Humboldt-Toiyabe National Forest's scoping process for the Bridgeport Southwest Rangeland Project (Project). The Project proposes to reopen old sheep grazing allotments that have not been utilized since between 2004 and 2014 for cattle grazing. This is a significant change that needs to be thoroughly analyzed. The MLC's focus is on the impacts to the allotment within the Mono Basin watershed, and recommends that the principles be applied throughout the Project.

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.

The MLC's specific comments are below:

Current process recommendations

The Bridgeport Ranger District (BRD) is currently preparing an environmental assessment in response to a request to graze cattle on the following allotments: Dunderberg, Tamarack, Cameron Canyon, and Summers Meadows. (Note: The Dunderberg allotment includes a separate allotment referred to as the Jordan Basin Unit, which is in the Mono Basin watershed.) After this analysis, the BRD will prepare either an environmental impact statement (EIS) or a finding of no significant impact (FONSI). Due to the numerous adverse impacts outlined below, the MLC believes that an EIS is required.

In addition to the proposed action and no-action (no grazing) alternatives, we urge the BRD to add additional alternatives to represent a broader range of actions, specifically

ones that further reduce allotment size (by eliminating sensitive areas), and/or eliminate allotments with sensitive habitat and water resources altogether.

High elevation meadows and soils

Allotments under consideration for this Project are between elevations of approximately 8,000–10,000 feet above sea level. Many of the allotments, such as the Jordan Basin Unit, have steep slopes. MLC is concerned that cattle grazing will cause increased erosion of these slopes, exacerbating multiple water runoff issues. Additionally, high elevation meadows are fragile and cattle trample soil, causing compaction which contributes to increased soil erosion.

The Jordan Basin Unit has not been grazed since 2004 and the soil and vegetation recovery is clearly visible. Introducing cattle to these areas will reverse this recovery.

MLC strongly urges the BRD to review California Trout's recently published *Sierra Meadows Partnership* plan—a comprehensive assessment of Sierra Nevada meadows and their importance for water storage and ecosystem health. The US Forest Service is a committed partner in the plan, and BRD decisions and actions should be consistent with the *Sierra Meadows Partnership* recommendations and guidelines.

Riparian corridors and wet meadows

The Project's high elevation allotments contain headwater seeps, springs, and creeks, as well as sensitive lands adjacent to wet meadows and riparian areas. These areas are important water sources for wildlife, birds, and sensitive native plant species, and MLC has concerns about grazing impacts on these areas if measures proven to keep cattle away are not specifically outlined and implemented. Wet meadow habitat found in the Jordan Basin Unit is widespread and not easily contained due to challenging terrain. The proposed Project does not outline specific ways these habitats will be protected.

Wildlife impacts from cattle

Domestic sheep grazing has not occurred on the Project allotments for several years. The US Forest Service responded to the issue of the proximity of domestic sheep to Sierra Nevada bighorn sheep by letting existing sheep grazing permits expire. MLC supports the decision by the US Forest Service to protect endangered Sierra Nevada bighorn sheep from possible fatal disease transmission from domestic sheep.

The prior domestic sheep grazing permittee is requesting to graze cattle on these allotments. Cattle have never been permitted on these allotments before, and therefore these allotments must now be evaluated for impacts associated with a different type of livestock. Since a significant amount of time has passed since the sheep grazing permits were allowed in these areas, wildlife studies need to be updated.

Sierra Nevada bighorn sheep

The Sierra Nevada bighorn sheep recovery plan identifies habitat critical for this protected species' survival. The Mt. Warren herd of bighorn sheep overlaps the Jordan Basin Unit and Dunderberg allotment.

MLC is concerned that cattle grazing will reduce available low-elevation winter forage for Sierra Nevada bighorn sheep. The 2007 Sierra Nevada bighorn sheep recovery plan emphasizes "safe access to preferred habitats, notably winter ranges" and that "recent declines in population sizes have been linked to the

decreased use of key resources on winter ranges." The California Department of Fish & Wildlife (DFW) recovery plan concludes that "A basic premise of the recovery strategy, therefore, is to reduce factors that inhibit the ability of Sierra Nevada bighorn sheep to utilize all components of their habitat."

DFW has identified a direct correlation between healthy low-elevation forage areas and reproductive success—making these forage areas a vital component for population recovery. The recovery plan states: "Increased use of low elevation winter ranges will increase nutrient intake and thereby enhance reproductive output and success. Increased low elevation winter range use will also decrease mortality associated with the use of high elevations during severe winters."

Given the impacts to Sierra Nevada bighorn sheep alone, the MLC strongly recommends that grazing allotments should not be considered for approval.

Bi-state sage grouse

Bi-state sage grouse are known to exist on Conway Ranch, which is in close proximity to the Jordan Basin Unit. This sage grouse population is part of the Bodie Population Management Unit (PMU). The Jordan Basin Unit has suitable sage grouse habitat and should be analyzed for potential grazing impacts, especially near wet meadows, which are preferred summer brood rearing locations for the species.

The Project proposes at least 22 miles of fencing to control cattle; fencing is well-documented as problematic for sage grouse in terms of both predation opportunities and collision hazards. Adding more fencing in areas known to currently have sage grouse—for example, Summers Meadow—and suitable habitat within the Project must be analyzed for these specific impacts.

American pika

American pika can be found in and adjacent to these allotments. Grazing impacts to pika have been well documented by Dr. Constance Millar, Senior Scientist, USDA Forest Service, in the paper *Influence of domestic livestock grazing on American Pika (Ochotona princeps): Haypiling behavior in the Eastern Sierra Nevada and Great Basin*. This study shows that grazing can impact pika populations by reducing available forage for haypiles in forefields, specifically: "Lack of abundant, diverse, and nutritional forage for direct and stored consumption might lower overall fitness of pikas. Similarly, lack of adequate forefield vegetation appears to force pikas to move high in the talus to find alternative food, exposing them to potentially less favorable thermal conditions in summer as well as in winter." Pika have been documented in the Jordan Basin Unit and are present in the other allotments as well.

Other wildlife

Almost all of these allotments provide essential wildlife habitat in a time of increasing habitat fragmentation. The Jordan Basin, Dunderberg, Cameron Canyon, and Tamarack (Cattle Creek) allotments all have diverse areas that support a wide variety of wildlife and bird species. A comprehensive inventory should be done in order to fully analyze impacts from cattle grazing. Some sections of these allotments provide essential habitat refuge—which is especially important within the context of documented climate change impacts. Preserving intact, healthy natural areas will better serve public land managers tasked with species protection and maintaining functioning ecosystems now and in the future.

<u>Modifying the allotment boundaries and pasture configuration</u>

MLC supports the BRD's immediate decision to reduce the Summers Meadow allotment by 50%, which then reduces the total allotment size by approximately 4,896 acres, resulting in a new project area size of

18,030 acres. However, MLC does not understand the rationale for combining the Summers Meadow, Cameron Canyon, and Tamarack allotments into a single allotment (Cameron Canyon). It is unclear if that change reduces or eliminates management flexibility or the fine-tuning of allotment areas in the needed environmental review process. More detail on this component of the project is needed.

Water quality impacts

Grazing almost always impacts water quality, whether impacts are localized or in down-system creeks and lakes. Bridgeport Reservoir has been experiencing serious water quality issues related to grazing, and the Lahontan Regional Water Quality Control Board has been working with the ranching community for many years to find ways to address the problems.

Because the Project allotments are in high-elevation areas, the water quality impacts may be more dispersed but nonetheless still exist. It is not clear from reading the Project description how the cattle will be watered or what type of access they will have to springs, seeps, and creeks. Grazing cattle is different than grazing sheep. With sheep, grazing management plans often require shepherds to control animal access to sensitive water areas. The Project does not outline how the cattle will be controlled, or how sensitive water areas will be protected.

Another important component to water quality impacts is the effect on people who recreate in these areas. The Virginia Lakes to Twin Lakes corridor is popular for dispersed camping, hiking, backpacking, birding, fishing, and hunting. Many of these activities take place away from public amenities and users need reliable water sources; there must also be a plan for notifying the public of potential health impacts to water quality.

Vegetation

As mentioned above, cattle impact soil structure and health by trampling and compacting the soil. Since the Project allotments are above 8,000 feet, the vegetation is sparse, delicate, and easily damaged. MLC recommends baseline vegetation studies for each allotment to document pre-grazing health.

As native plants are damaged and areas of bare soil exposed, invasive plants such as cheatgrass move in and outcompete native vegetation. Currently, cheatgrass is not as common at higher elevations in the Eastern Sierra primarily because the majority of disturbed areas are at lower elevation. The BRD should analyze and quantify the impacts and potential spread of cheatgrass in these areas.

Recreation

As mentioned before, the Virginia Lakes to Twin Lakes corridor and surrounding areas are very popular recreational areas. User conflicts arising from grazing and recreational activities occurring in the same area and at the same time seem highly probable. MLC urges the BRD to study potential recreational use conflicts and to outline a comprehensive visitor information outreach plan.

US Forest Service lands continue to experience the strain of multiple demands and competing activities. All of the Project areas under consideration for cattle grazing are extremely popular recreational areas. People camp, hike, backpack, bird watch, fish, hunt, and relax in this unique and easily accessible area. The Eastern Sierra continues to experience increases in visitation and recreational use throughout both the Inyo and Humboldt-Toiyabe National Forests. The US Forest Service must start to differentiate and separate uses more to avoid user conflicts.

Wilderness

Portions of some of the allotments are actually in designated Wilderness, and several are adjacent to Wilderness areas. Despite the fact that the scoping notice explains that "livestock grazing, where established prior to the effective date of the Wilderness Act (September 1964) is permitted subject to reasonable regulations," the BRD must analyze the impacts of the proposed cattle grazing in relation to the Wilderness areas. The BRD must also combine that with the overlay of a very popular wilderness area and user expectations of a "wilderness experience," since livestock grazing affects the experience of Wilderness areas.

Conclusion

MLC recognizes that the BRD must consider this grazing application as part of its current Land Use Management Plan, and that grazing is an institutionalized historic use of public lands. Because of the largely negative impacts of cattle grazing to high elevation meadows and soils; riparian corridors and wet meadows; wildlife, including Sierra Nevada bighorn sheep, Bi-State sage grouse, American pika, and more; detrimental water quality effects; native vegetation; recreation; and the wilderness experience, a comprehensive EIS is necessary.

Thank you for the opportunity to comment on the Humboldt-Toiyabe National Forest's scoping process for the Bridgeport Southwest Rangeland Project. We look forward to engaging in this process as it develops. Please contact me at (760) 647-6595 or *lisa@monolake.org* if you have any questions or would like to discuss further.

Sincerely,

Lisa Cutting
Eastern Sierra Policy Director