

Aaron Coogan, District Ranger
USDA Forest Service
Humboldt-Toiyabe National Forest (H-T)
Bridgeport Ranger District
Bridgeport, CA

January 4, 2022

Regarding: Revised Notice of Proposed Action (NOPA), Bridgeport Southwest Rangeland Project (BSRP)

Dear Ranger Coogan,

Below are brief comments regarding the proposed action to authorize cattle grazing within portions of the Dunderberg, Tamarack, Cameron Canyon, and Summers Meadow allotments on the Humboldt-Toiyabe National Forest. Over the last 30 years, I am fortunate to have spent time hiking, birdwatching, and botanizing within the proposed grazing allotments including approximately six visits to enjoy the wildflower displays of Kavanaugh Ridge. On 29 May 2018, I visited the Summers Meadows area for the first time and was delighted by the sweeping vistas, vigorous aspen groves with a lush understory of native species, high diversity of flowering herbaceous species such as *Phlox*, *Astragalus*, *Senecio*, *Castilleja*, as well as many wax currants (*Ribes exiguum*) in full bloom. It is a spectacular area with great biological diversity, appears to have recovered from sheep grazing, and a landscape that could be significantly impacted by cattle grazing.

I did not receive the NOPA from the Bridgeport Ranger District despite submitting comments in 2018.

The NOPA states that grazing has yet to be authorized, yet troughs and fence construction are being proposed. How can the Forest Service (legally) amend the H-T Forest Plan to eliminate restrictions on cattle grazing before finalizing the NEPA process?

I am requesting that the Forest Service prepare a full Environmental Impact Study (EIS) to analyze significant impacts. These impacts are not mitigatable. This document would need to include a full range of alternatives.

1a. Sensitive species.

There is potential for multiple sensitive/threatened/endangered species to be impacted if grazing is allowed to return to the proposed allotments.

In 2018, I visited Summers Meadow Road during the middle of the day with rain threatening. Conditions were not ideal for detecting many bird species, but I recorded 49 bird species including multiple singing Yellow Warblers (*Setophaga petechia*), California Department of Fish and Wildlife (CDFW) species of special concern when breeding.

On January 5, 2022, I queried eBird. No hotspot exists for the specific affected area, so I examined data for Green Creek Campground. 81 species had been documented thus far, including 6 Bi-state Sage Grouse observed on 28 July 2019 (Sullivan, B.L., C.L. Wood, M.J. Iliff, R.E. Bonney, D. Fink, and S. Kelling. 2009. eBird: a citizen-based bird observation network in the biological sciences. *Biological Conservation* 142: 2282-2292.) Note that I did not search eBird for Sage Grouse.

1b. Several other special status species that may have been overlooked in other scoping letters is the Sierra Nevada mountain beaver (*Aplodontia rufa californica*), California Department of Fish and Wildlife (CDFW) species of special concern yellow rail (*Coturnicops noveboracensis*), US Forest Service sensitive species as well as CDFW species of special concern. (CDFW Special Animals List dated April 2018).

Yellow rail¹ has potential to occur in habitats such as the wet meadows of upper Summers Meadow. Also, I highly recommend consultation with Great Basin Bird Observatory (GBBO). During a very quick check of eBird species occurrences, I noted that GBBO submitted a checklist containing the state endangered willow flycatcher for the Little Walker River. Potential habitat for this species (dense willow thickets) is found within the project area. Willow flycatcher has been documented nesting at Dynamo Pond.

A Bi-state Sage-grouse (proposed federally threatened) lek occurs within 0.6 miles of a proposed trough.

2. Grazing impacts.

Grazing and over-browsing reduces aspen regeneration, understory foliage, and vegetative structural diversity important for numerous bird species. Grazing may also increase cowbird abundance which can negatively impact breeding birds. Health of aspen across the Sierra Nevada has deteriorated. Aspen habitat, especially that associated with riparian vegetation, is the single most species-rich avian habitat in the Sierra Nevada. Aspen restoration should be among the highest priorities of land managers in the Sierra Nevada.

¹ Nearby Bridgeport Valley is an Audubon Important Bird Area and is one of only two locales in California known to support breeding yellow rails. See:

<https://www.audubon.org/important-bird-areas/bridgeport-valley>

3. Sensitive Habitat.

There is potential for many CDFW Sensitive Natural Habitats to occur within the proposed action area. I did a quick search and a few of the many plant alliances listed as sensitive within the state of California could include Mountain Juniper associations (p. 10), single leaf pinyon/aspen groves (p. 20), black cottonwood forest (p. 20).

See:

<https://www.wildlife.ca.gov/Data/VegCAMP/Natural-Communities>

4. Comments specific to the NOPA.

I have several specific comments about language and proposed actions in the NOPA:

Standard #120. What is definition of seral in this context?

Herding (p. 10). Although the NOPA indicates herding would be conducted via “range riders”, it does not define what this constitutes. The document needs to be refined to state that quads, motorcycles, or trucks must be prohibited to herd cattle, and define “range rider”.

Fences (p. 11). Barbed wire fencing is detrimental to Bi-state Sage Grouse. The 8 miles of fencing described in the NOPA should be removed, not maintained.

5. Conclusion.

Given the high biodiversity and healthy condition of the vegetation in the proposed allotments, grazing is inappropriate and would cause significant resource degradation.

An EIS must be prepared if the FS is considering implementation of the actions detailed in the NOPA.

Thank you,

Emilie Strauss