

January 5, 2022

Aaron Coogan, Acting District Ranger
Bridgeport Ranger District
HC 62 Box 1000
Bridgeport, CA 93517

Letter sent electronically: <https://www.fs.usda.gov/project/?project=49993>

Re: Revised Notice of Proposed Action for the Bridgeport Southwest Rangeland Project

Dear Ranger Coogan,

Thank you for the opportunity to comment again.

I stand by the project comments I sent on June 7, 2018 (scoping) and August 5, 2019 (NOPA) and remain strongly opposed to permitting cattle grazing on these fragile high elevation allotments in the Eastern Sierra. Attached are my two prior comment letters.

First, within this revised Notice of Proposed Action (NOPA), I do not support the Specific Plan Amendment to the Toiyabe Land and Resource Management Plan (TLRMP). These are some of the many reasons:

- The introduction to the proposed amendment states: *To ensure consistency between the project and the Toiyabe Land and Resource Management Plan, as amended, there is a need for a project specific plan amendment that would allow the new location of the water troughs to be located within the 0.6-mile exclusion buffer prescribed in the Bi-state Sage-grouse Amendment. 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."*

The Greater Sage-grouse Bi-state Distinct Population Segment Forest Plan Amendment (Bi-State Amendment) was created and agreed upon to accomplish the "desired conditions, objectives, standards and guidelines that will provide the direction needed in the TLRMP to conserve, enhance and/or restore sagebrush and associated habitats to provide for the long-term viability of the bi-state DPS." (Record of Decision, May 2016)

Proposing "This standard does not apply to the Bridgeport Southwest Rangeland Management Project" disregards and violates the very purpose and intent of the TLRMP amendment. What makes it okay for the Bridgeport Ranger District to think this doesn't apply to the Bridgeport Southwest Rangeland Management Project? And, additionally, how can it be right to propose this specifically on behalf of one applicant's request?

- The proposed specific plan amendment that "includes the reconstruction of three water sources and the piping of water from those sources out of the riparian areas" within the 0.6-mile exclusion buffer prescribed in the Bi-State Amendment violates the Bi-State

sage-grouse protection measures—measures that the Bridgeport Humboldt-Toiyabe USFS staff signed off on—and sets a dangerous precedent. It's a chipping away at a well-considered and essential plan.

Regarding the revised NOPA:

Successful management of cattle and monitoring of desired conditions are unlikely to occur.

- First, Additional Standards and Guidelines from the Sierra Nevada Forest Plan (SNFPA) states: *The following standards from the SNFPA are applicable for this analysis:*
 - 103. *Prevent disturbance to streambanks and natural lake and pond shorelines caused by resource activities (for example, livestock, off-highway vehicles, and dispersed recreation) from exceeding 20 percent of stream reach or 20 percent of natural lake and pond shorelines.*
 - Having hiked to Kavanaugh Ridge many times, I have witnessed all of the disturbances listed above despite the presence of USFS signs: vehicles driving off-road around snowbanks blocking the road, weaving between Whitebark pines, and leaving deep muddy tracks; increased dispersed camping, driving, and parking on the lake's edge. Besides the signs, which are clearly disregarded, there is no evidence of management or any attempt to control this situation. It's a free-for-all that's damaging and disrespectful to our public lands.
 - So the question is, if Kavanaugh, as one example, can't be currently managed, how can USFS possibly manage the complex details, desired conditions, and other SNFPA standards (53., 120., 121.) applicable to this project, including sage-grouse protections?
 - Also, will the "range riders" be working day and night? How many range riders will be required to make sure all the cattle are always where they are supposed to be? What are the environmental impacts of the range riders galloping around? Where will they be based? These questions have to be answered and disclosed.
 - How will USFS monitor everything, including the "range riders"? How will that be possible?
- Under the long list of Identification of Issues, the impacts of cattle in the allotments are vaguely described as both negative and positive. It is necessary to work from a baseline understanding that cattle are not native. They would be a never-before introduced non-native species causing deleterious effects on the entire high elevation ecosystem. Their impacts cannot possibly be considered positive. We are kidding ourselves to say cattle would have any beneficial impact.

Before making a decision, the proposed specific plan amendment and the Bridgeport Southwest Rangeland Project as a whole must be thoroughly analyzed in an Environmental Impact Statement (EIS), not an Environmental Assessment (EA). Too much is at stake.

This is an opportunity for the Bridgeport Ranger District to do something brave and brilliant on behalf of these high elevation allotments currently under consideration for cattle grazing. Summers Meadow, Cameron Canyon, Tamarack, Dunderberg, and Jordan Basin have been closed to sheep grazing for good reason since 2009. Cattle have never grazed these allotments. For all the unanswered questions and negative impacts of cattle grazing in these areas, I ask the Bridgeport Ranger District to not submit to the pressure of an applicant and, instead, dedicate any time available for management towards the continued healing of these magnificent areas.

These are hard times, with climate change, drought, wildfire, loss of species. As humans, we have to do everything we can to not cause more harm than we already have. Adding cattle grazing to these allotments is a recipe for disaster.

After writing this letter, I reviewed the comment letters I sent in 2018 and 2019. It's clear nothing has changed. My comments are basically the same. The Bridgeport Ranger District continues to tout the benefits of cattle grazing on these allotments. Are our comments looked at and deeply considered? Or is this just an exercise that has to be administratively followed with disregard to the seriousness of the issues? I hope for so much more.

Thank you for taking my comments into consideration.

Sincerely,

/s/ Margaret Eissler

Lee Vining, CA