P.O. Box 128 Lee Vining, CA 93541 rockwren@att.net August 5, 2019

Jan Cutts District Ranger Bridgeport Ranger District HC 62 Box 1000 Bridgeport CA 93517

Letter sent via email: comments-intermtn-humboldt-toiyabe-bridgeport@fs.fed.us

RE. Bridgeport Southwest Rangeland Project: Notice of Proposed Action

Dear Jan Cutts,

As a Mono Basin resident with a lifelong connection to the High Sierra, I submit the following concerns about the 2019 Notice of Proposed Action (NOPA) regarding potential conversion of the Dunderberg, Cameron Canyon, Summers Meadows, and Tamarack allotments to cattle grazing.

First, thank you very much for removing Cattle Creek from the allotments considered for cattle grazing.

Second, I still stand by my comments sent June 7, 2018. I remain strongly opposed to permitting cattle grazing on these fragile high elevation allotments.

Some of the many reasons:

- 1. In the NOPA, *Identification of Issues*, within every listed statement, a positive and a negative are given. The positives, like, "Under properly managed grazing, hoof action could roughen soil surfaces and increase infiltration, a positive effect on soil quality," or "On the other hand, properly managed grazing could increase plant vigor and cover and maintain plant composition, and redistribution of livestock waste across the landscape could increase nutrient cycling, fertility, and plant production," or "Properly managed grazing could maintain soil and streambank stability while increasing the vigor and diversity of aquatic and riparian plant and wildlife communities," are long reaches—seemingly far-fetched attempts to balance the negatives with a positive spin. We all know cattle are not native to these ecosystems. They do not belong in these places. Their very presence can't help but be detrimental and have long-lasting effects on everything in these high elevations.
- 2. With warming temperatures, these allotments cannot afford to deal with additional stressors, like cattle grazing. USFS must keep the quickly changing climate in mind in every decision made, including this one. Climate cannot be disregarded or not addressed, as suggested in the NOPA.
- 3. The proposal that "range riders" will successfully manage the cattle in mountainous terrain and keep them in check sounds impossible, time consuming, and expensive. And what about the impacts of the range riders, the horses galloping around on fragile grounds? Where are they going to camp? The horses will graze as well. None of this is accounted for in the NOPA.

- 4. I worry about the "flexible season of use"—how the "permittee would be able to graze more cattle for a shorter season or fewer for a longer season." The season would be shorter because of a heavier winter which means the meadows would be wetter and at their most vulnerable. It doesn't make sense that more cattle would be allowed in these times.
- 5. I worry, too, that "Monitoring would initially be completed yearly, though it may be less frequent once the BRD was satisfied that permit terms and conditions were being implemented, ..." Having witnessed the USFS struggle with maintaining a strong management presence in the field, I'm sure not keeping an eagle eye on the management of the cattle grazing is a recipe for disaster. Even monitoring once a year seems inadequate.
- 6. Cattle will not only degrade these allotments—fragile subalpine and alpine landscapes with magnificent views, vibrant displays of wildflowers, wildlife, clear springs and streams—but also impact recreational use through this degradation and by their very presence. Recreationalists and cattle are not compatible.

Again, these allotments are very special places in the Sierra Nevada. All four deserve to be well taken care of, not trampled for profit by one at the expense of many.

I urge the Humboldt-Toiyabe National Forest **not** to proceed with the Bridgeport Southwest Grazing Project. If the Humboldt-Toiyabe decides to proceed, then completing an EIS with a full analysis of a range of alternatives should be required.

Thank you very much for the opportunity to comment.

Sincerely,

Margaret Eissler