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Comments: I am disappointed that I received no response to my initial comment when I submitted it in 2021. It was substantive, and warranted a response. The main point of my comment was that these allotments may not have been allotted over the past few years; but they have been full of cattle, and certainly have not been vacant or rested. The EA does not take into account the impact of currently trespassing cattle, which draws into question the accuracy and validity of the assessment. I have included my initial comment below, again. I hope that I will receive a response this time.

I oppose the proposed action to open allotments on the Monitor-Toquima. The primary reason that I oppose this action is simply because these allotments have not been vacant, nor rested. They might not have been allotted, but I saw cows for extended lengths of time in many of the areas described in the notice of proposed action. On the Table and in the Toquimas. At Georges Camp, in Pine Creek, Buck Canyon, North Table Spring, all over Mosquito Creek. July, August, September 2020. How is it being said that these allotments have been vacant? What constitutes an occupied allotment if not an allotment with cattle on it for months in a row?

The document details that a specific number of head/months will be prescribed for each allotment. As I understand it, the prescription for the last twenty years has been zero head/months, and that has not been followed. Why will the amount now be followed after it is increased from zero? It seems to me that increasing the number of allowed head/months on these allotments will only serve to embolden trespassers. "The maximum cattle numbers in Table 3 would not be exceeded." By what mechanism? The current maximum cattle numbers of zero on these allotments is being exceeded.

There is a line in the document that states that "the overall impact of unauthorized grazing was low." I disagree whole-heartedly. I backpacked into the top top of Mosquito Creek on the Table last summer, and my only water source available was absolutely covered in cow excrement. But, it was the only water around, so I was forced to drink it. This same issue repeated itself several times, at every water source I found in the Wilderness. Every spring I found on the Table was covered in cattle excrement. Wilderness quality is already severely degraded due to cows, and this Project seeks to further degrade it.

In another section of the document: "In 2007, a capability assessment was completed for all allotments in the Austin-Tonopah Ranger District. The analysis process followed the most recent capability analysis direction, and a narrative describing the process is in the project record. Since 2008, little has changed that would prevent the rangelands on these allotments from meeting the capability criteria used." I, again, disagree. Much has changed. Sage Grouse populations have plummeted, and this is perhaps their southern stronghold. Mule deer tags are cut year after year, with NDOW repeatedly blaming the lack of forage. And the Forest Service, with this Project, proposes to increase the amount of forage that it takes from declining wildlife populations, and give it to cattle. And not just any forage. These allotments are not just average habitat that will have a correspondingly average impact on wildlife. They are the best habitat. Georges Camp has some of the best forage on the Table, and it was covered in cows all last summer, excluding wildlife. This has a far more detrimental impact on wildlife than if the cows were placed in Pinion-Juniper, or some other less critical habitat type. .

Reopening these allotments is not in the public interest. It rewards the same industry that has been and is running cattle in these exact allotments illegally. It degrades Wilderness, and it harms wildlife populations that are already hurting.