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Via email <comments-intermtn-humboldt-toiyabe-bridgeport@fs.fed.us>

June 7, 2018

RE: Bridgeport Southwest Rangeland Project

Dear Ms. Murphy:

Thank you for the opportunity to comment during scoping for this proposed project which would authorize cattle grazing within portions of the former Dunderberg, Tamarack, Cameron Canyon and Summers Meadows allotments on the Humboldt Toiyabe National Forest.

I appreciate that your office has rested these allotments from sheep grazing for several years, resulting in noticeable recovery in many areas of stream banks, meadows, riparian, aspen, mixed conifer and Great Basin steppe habitats.

I have been a Mono Basin resident for more than thirty-four years and have enjoyed hiking, camping, backpacking, skiing, birding, natural history study, photography and painting throughout this magnificent Eastern Sierra front country so close to home. Many local residents consider these areas to be our backyard and know them intimately. The use of our public lands for recreation constitutes one of the most important aspects of our local economy. It is the most compelling reason that most local residents live here and the impetus for thousands of visitors from all over the world who make the effort to journey here.

Each of the proposed allotments have unique attributes that demonstrate that labelling these areas only as "range" is an inadequate and misleading misnomer. To propose managing this country principally for cattle, to be measured by "stubble height" and "leader growth" is a narrow prescription of management objectives, to the detriment of all the other functions and uses of these public lands. I do appreciate that livestock grazing is an important part of the Mono County economy. Where, and how it is managed on public lands, must be weighed along side all the other functions and uses that these lands provide.

For example, the Jordan Basin, so close to Mono City, is very popular to local residents for hiking, camping, hunting, skiing and viewing the superlative vistas of Mono Lake, the Bodie Hills and Virginia and Lundy Canyons. The healthy, dense, high elevation bitter brush fields and deep lodgepole pine forests offer food and shelter for numerous

animal species. Wildlife sightings, including deer with fawns, bear and sage grouse have been reported by local observers on that sweeping plateau.

Dunderberg Peak is a breathtaking hikers' goal, its shoulder's along Kavanaugh Ridge dotted with lingering snowfields and ponds, abundant springs and streams, aspen groves, dense mixed conifer forest, pika habitat, mining camp relics, and the unexpected delight of Dunderberg Lake, pouring out into a dramatic creek drainage- a steep succession of waterfalls, wet meadows, aspen stands and ponds.

If one chooses to brave the long, steep entry on a backpack through the proposed Summers Meadow, Cameron Canyon and Tamarack allotments, the rewards are a fascinating valley bottom to Sierra Crest hike through diverse habitats progressing from wet meadows, the lively willow and aspen-lined riparian corridor of Summers Creek, dense aspen stands with wildflower understories, slopes of fragrant sagebrush, bitter brush and ceanothus, rock gardens of buckwheat, paintbrush, mule's ears and stands of western white pine, until finally climbing into the Tamarack Creek drainage. All along the way, one is treated to sweeping views of the Bodies and Sweetwaters to the east and the lush slopes leading up to the Sierra Crest. The wild and diverse forested Tamarack watershed culminates in alpine lakes and tundra slopes that reveal from the crest one of the most spectacular views in the Eastern Sierra- the Sawtooth Range of Yosemite- Matterhorn Mountain so close, it feels like one can reach out and touch it.

For years, domestic sheep grazing marred this experience, with sheep mowing down campsites and trampling the banks of Tamarack Lake and the alpine Honeywell Lakes, degrading meadows and aspen stands throughout the canyon.

The steep Cattle Creek drainage offers a challenging and glorious hike that more than lives up to its Wilderness qualifications.

Now, looking to the future, I am very concerned that this proposal, to introduce cattle grazing into such a wide swath of these superlative landscapes will significantly reverse the recovery of important plant and animal habitats, seriously degrade water quality, reduce the water holding capacity of our watersheds and negatively impact the value of the resource for recreation. Of greatest concern is that this action will diminish the resiliency of this environment in the face of global warming- at a time when we should be doing just the opposite: acting to preserve species and habitat and assisting in its recovery to the fullest potential.

Because of the significance of a great many potentially adverse impacts and the cumulative nature of impacts over thousands of acres over a long time frame, it is clear that an EIS, rather than an EA is required for this proposed action.

The Scoping Notice's initial list of issues and potential impacts is a good start; an EIS analysis must expand the list of issues and questions to be addressed:

ECOLOGICAL: A BIOLOGICAL INVENTORY SHOULD BE REQUIRED AND DESIRED CONDITIONS MORE BROADLY DEFINED

It is an oversimplification and premature to frame managing grazing by measurements such as height of stubble to be left in meadows and per cent utilization of woody riparian species and herbaceous species until these areas are inventoried- for not only sensitive and endangered plants and animals, but also biological diversity, current and potential ecological complexity and status in terms of recovery from previous grazing impacts. Current descriptors of desired conditions are unduly limited to "rangeland" values and fail to acknowledge the breadth of the natural resources at stake.

VEGETATION

On what data does the forest service rely to conclude: "There are no known occurrences of threatened and endangered plants in the project area," besides the candidate species whitebark pine? After several years of rest from grazing, these areas require renewed comprehensive surveys for baseline data.

Weeds: the Scoping Notice acknowledges the presence of weeds "near roadways and invasive annual grasses in some low- elevation areas" and that "livestock grazing may affect special-status plant species, the distribution of noxious weeds, and the composition of native plant communities." Cheat grass has invaded the Mono Basin nearly everywhere now and occupies the interstitial spaces between Great Basin shrubs in major infestations formerly occupied by native grasses and forbs. Cheat grass is spreading upward in elevation, for instance, to at least 8,000' on Tioga Pass. Cows would certainly be a vector for the invasion throughout the proposed allotments. In Bridgeport Valley, ranchers use herbicides to control Iris. That is not a desired condition, but the result of years of cattle grazing, even in rotated pastures.

One of the most important actions the forest service can take is to conserve existing native seed banks and avoid soil disturbance which favors the spread of invasive annuals.

SOILS AND WATERSHED

The Scoping Notice correctly acknowledges that "Livestock grazing may affect soil and watershed health in several ways. Trampling may affect soil productivity by compacting the soil. Loss of effective ground cover in upland areas may increase overland flow and soil erosion. Loss of ground cover and plant vigor in riparian areas can decrease their ability to filter pollutants and function as a floodplain. Livestock grazing may impact water quality by altering streambank stability or nutrient loading. The project area includes some erosive soil types, steep slopes, and several streams and associated riparian areas and meadows."

These impacts cannot be mitigated. Due to the complexity of the terrain, fencing is not realistic, not even 24 hour herding of cows would avoid the resulting trampling, loss of ground cover and erosion. How the forest service can justify drawing the uppermost elevational boundary as the Sierra Crest- is beyond comprehension.

In addition, the incision of stream courses from sheep grazing is apparent in many locations, as is the rilling and gulying of existing roads, which is undermining and draining adjacent meadows, lowering water tables.

TERRESTRIAL WILDLIFE, FISHERIES AND AMPHIBIANS

The Scoping Notice should discuss the potential for increasing the invasion of opportunistic avian and mammalian species such as the brown-headed cowbird and the California ground squirrel. These species are parasitic and predatory on avian nesting birds and are known to follow as livestock bring dung and disturbance to an area.

The Scoping Notice acknowledges the potential for habitat for a wide variety of species of concern. A significant amount of the terrain in question possesses north or northeast facing aspects, which provide for longer holding of winter snows, cooler soil temperatures and cooler surface water temperatures, important factors supporting the adaptation and elevational adjustments of ecosystems to warming air temperatures. Moderation of water temperatures will be key to maintaining the health of downstream fisheries, as well.

I want to commend the Humboldt Toiyabe for publishing its own "Climate Vulnerability Report" (2011) which clearly identified the problems that would be caused or aggravated by the proposed action and the justification for doing everything possible to conserve and restore these key remaining and potential habitats.

From the Climate report:

"Many ranges have had domestic stock grazing for more than 100 years and, as a result, the plant species composition has changed greatly from that of the original ecosystems. Western rangelands previously dominated by perennial bunchgrasses have been converted, primarily through overgrazing, to annual grasslands that are susceptible to invasion by introduced forbs (Tomasa 2000)."

"Excessive livestock grazing and loitering in riparian meadows and woodlands has resulted in loss of vegetative cover, compaction of soils, erosion and lowering of the water table."

And:

"Warmer temperatures, decreased snowpack and earlier run-off have resulted in a longer period of hot season grazing by livestock. During the hot season, cattle and horses tend to stay in riparian areas for shelter and forage. The resulting effect is a loss of vegetative cover, increased soil exposure, increased soil compaction and streambank

alteration, and lowering of the water table. Climate change with increasing temperature will extend the hot season, and could result in increased loss of riparian ecosystems, unless livestock are managed.”

“Noxious and invasive weeds have become more prevalent in riparian areas and have helped to facilitate incision and loss of water table, due to altered root structures that are less effective against fluvial erosion, and do not facilitate infiltration and ground water movement.”

“Forest data shows when all riparian vegetative types are combined, they account for 1% of the vegetative types found on the Forest, but this 1% accounts for 24% of noxious weed occurrence. The fact that riparian related vegetation types support such a disproportionate amount of noxious weeds species makes management of riparian areas even more important.”

“Riparian areas also serve as the foundation of much of the region’s biological diversity. Declining conditions in riparian areas are likely to have cascading effects not only on aquatic species, but on the many upland species that use these ecosystems as their sole source of water (Chambers 2011).”

Since this climate report was written there are many more published studies confirming that the impacts of climate change are already apparent: both on warming temperatures and on the timing and increasingly extreme fluctuations in precipitation. This new work should inform the policy and decisions made regarding this and other proposed actions. (See, for instance: “Climate Change in the Sierra Nevada: California’s Water Future”, (Alex Hall, 2018): bit.ly/uclaclimaterereport.)

RECREATION

The Scoping notice acknowledges that livestock grazing has the potential to affect recreation in the project area, including developed and dispersed camping, hiking, hunting, and OHV travel. “Potential effects include seeing livestock, encountering impacts from livestock grazing such as excrement, trailing, beds, and livestock wandering into campgrounds and other sites.” The analysis must go further to acknowledge that these public uses in the project area are likely to be curtailed, affecting recreation and the local economy, not online the adjacent, highly used Twin Lakes and Virginia Lakes areas, but also in nearby communities.

DESIGNATED WILDERNESS AND INVENTORIED ROADLESS AREAS

In the 21st century, there are no compelling reasons to introduce livestock grazing into Wilderness areas, in this case, the Hoover Wilderness. Livestock grazing “will”, not just “may” affect the roadless characteristics of Inventoried Roadless Areas in question, including portions of the Hoover Cattle Creek, Hoover Green Creek North, Hoover Virginia Lakes, and Hoover Mt. Olsen IRAs.

WATER QUALITY

In recent years I and others, while hiking along numerous streams on the east side and over the divide to the west in the Tuolumne River watershed, I and others have noted signs of increasing eutrophication in the form of filamentous algae infestations. This is likely due to the multi-year drought, the lowering snow pack and increasing CO2 input from fires and atmospheric carbon rise.

Toxic blue green algae blooms have been reported over the last decade in California lakes and streams, as a result of warming temperatures, lowered water flows and increasing nutrient levels caused by agricultural runoff. Notices have gone out advising not to eat fish from compromised waters. Even the use of water filters cannot remove the toxins from cyanobacteria in affected waters.

The proposed action will substantially increase pollution from cattle excrement entering streams and will render the affected Sierra sources undrinkable for backpackers and downstream users. In recognition of this problem, the East Walker River Watershed Plan encourages Best Management Practices that limit access of livestock to stream channels and minimize livestock waste concentrations near streams. The proposed allotments contain so many springs, seeps, wet meadows and streams that it would be impossible to fence or herd out cattle to prevent these impacts.

PROCESS

Given the significantly large area of public lands that would be impacted by this proposed action and the importance of public input to such a major commitment of public resources, the thirty day notice for public input was inadequate and more time to gather input is required. Public scoping meetings on the proposal should be offered in Lee Vining and Bridgeport.

An EIS process should also require ample time for public input on a draft EIS. Given the overwhelming cumulative impacts of grazing cattle, a "No Grazing Alternative" must be considered. Due to the high resource values of these unique national forest lands, a commitment to baseline biological surveys and long-term monitoring of ecological conditions is warranted, with a primary goal of sustaining and restoring the health and essential functions of these watersheds in this challenging time of climate change.

Thank you,

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