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Aaron Coogan

District Ranger

Bridgeport Ranger District Humboldt-Toiyabe National Forest HC 62 Box 1000

Bridgeport, CA 93541

Dear Mr. Coogan,

I am writing to object to the Proposed Action announced in the NOPA of December 2021 that would amend the Humboldt-Toiyabe Forest Management Plan (H-T FMP) eliminating the requirement to prohibit water developments for livestock within 2 miles of an active lek of the Bi-State Sage Grouse or within .6 miles of riparian habitat.

Putting forward this proposal-before completing the full NEPA process on the original Proposed Action (PA) concerning opening allotments to cattle in the Bridgeport South- west Rangeland Project-essentially fragments and leap-frogs the NEPA process. This is out of order because what is first required is to make a determination whether or not there are overriding considerations making it necessary to accept significant unmitigated and cumulative impacts that will degrade the environment. Such a conclusion is premature because no analysis has been completed to determine if an EA or EIS is triggered nor has that NEPA document been written. This singular new proposal cannot stand alone but must be considered in the context of the larger action that has triggered NEPA.

The December 2021 NOPA document offers a list of issues that are summarized from the public scoping on the original NOPA. It should be obvious to any unbiased reader that these issues are of a sufficiently significant and cumulative level to require that an EIS be prepared for the entire project. The December NOPA states, however, that the public should comment only on one additional action of walking back protections for sage grouse and riparian habitat. To minimize any discussion on impacts, the document repeatedly suggests that all impacts can be mitigated by Range Riders implementing a Grazing Management Plan, yet to be produced. Perhaps this would be possible-if cattle wore diapers and had wings. Many commenters, myself included, have pointed out that given the complex distribution of many sensitive habitats throughout the proposed allotments, it is infeasible to keep cattle out of riparian, stream, springs, ponds, lakes, microbial crusts, delicate meadow habitats and fragile soils and unique topographical features. The document proposes a one-time monitoring after the cattle are introduced; this is too little, too late.

The public can only conclude that the H-T has a bias in favor of the lessee over conducting a fair NEPA process. But the H-T is under NO obligation to grant these allotments to the lessee without a fair and orderly process for the public as well. In addition, there is NO COMPELLING OR OVERRIDING NEED to open these areas to cattle at the expense of the health of the human and natural environment. An Alternative of permanently closing these allotments must be offered and considered.

I need to point out that if the H-T FMP of 1986 is the umbrella document for all actions related to forest management on the H-T, it is woefully out of date on the subject of livestock grazing. Commenters have repeatedly brought to your attention with on-the-ground documentation and recent literature review the many problems associated with the out-dated guidelines and standards for "range management," which are inadequate for maintaining and improving the desired conditions of all the other resources on the forest. To help remedy this problem, the Forest Plan Amendment for Management the Bi-State Sage Grouse was created. Now the H-T proposes watering down that plan, rather than addressing the urgent need to truly acknowledge the decades of resource degradation resulting from favoring livestock throughout the H-T over everything else.

The H-T Climate Vulnerability Report of 2011 also provides documentation of the accumulating negative impacts from years of grazing across the forest which contradicts the desirability of easing restrictions on cattle grazing. To say that the PA would not contribute to climate change impacts is incorrect. The carbon

sequestration potential of these diverse upland habitats is very high and should be managed for full potential; degradation is not justified. In fact, if there are any lands on the Bridgeport District or H-T worthy of a much higher level of resource protection-for outstanding scenic, recreational, biodiversity, sensitive species and habitat values-the proposed allotments overwhelmingly possess them.

I once again need to bring to your attention that I never received notice about this new NOPA, although I am signed up for such notices and have filed comments previously in 2018 and 2019 on this project. I received no response to my request on 12-23-21 for an extended comment period, even though the comment period was unfairly set for just 30 days during the Christmas/New Year holidays. I am also concerned that I have found no record of my previous comments and attached photos in your publication of comments in 2019. Therefore, I am reattaching those comments and photos for the record and once again ask that a full EIS be undertaken given the many reasons I have listed in today's and my previous comments-and that the new NOPA is considered within the context of that full EIS.

Thank you,

Ilene Mandelbaum Lee Vining