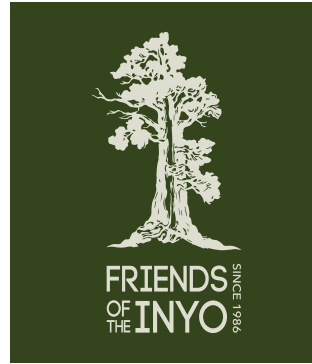


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June 7, 2018

Re: Bridgeport Southwest Rangeland Project Proposed Action

Submitted via email to: [comments-intermtn-humboldt-toiyabe-bridgeport@fs.fed.us](mailto:comments-intermtn-humboldt-toiyabe-bridgeport@fs.fed.us)

Thank you for the opportunity to submit comments on the Public Scoping Notice for the Bridgeport Southwest Rangeland Project which anticipates preparation of an environmental assessment (EA) addressing livestock grazing on the Cameron Canyon, Dunderberg, Summers Meadow, and Tamarack grazing allotments on lands within the Humboldt-Toiyabe National Forest. Friends of the Inyo supports the actions taken by the Forest Service to protect Sierra Nevada Bighorn Sheep from disease transmission by permanently canceling the domestic sheep permits on these allotments. We do however have concerns regarding the impacts of the new proposal to issue cattle grazing permits on these allotments and alternatives that should be considered during this National Environmental Policy Act (NEPA) process. We understand the need to respond to an application to graze cattle on these allotments but do not support the proposed action to authorize cattle grazing.

A thorough site visit of allotments was completed on May 24 (photos attached) and our assessment is this area may not be suitable or appropriate for cattle grazing given potential management conflicts and the slow recovery of meadow and subalpine systems from previous sheep grazing. In order for the USFS to fully understand the environmental impacts of introducing cattle grazing in this area an Environmental Impact Statement (EIS) is likely required (*See* 40 C.F.R. § 1508.27; 42 U.S.C. § 4332(2)(C)). There is also precedent for an EIS given the last grazing proposal for this area. The EIS must consider a range of alternatives that should include, but are not limited to: a no action alternative of no cattle grazing, not authorizing cattle grazing on some of the allotments or portions of the allotments; resting the allotments for at least a 10 year period before any new livestock grazing is considered in order to update baseline surveys for rare, sensitive, and listed species; greater protective measures for water resources and species habitat on these allotments; and further limiting the season of use and animals per unit. Furthermore, the environmental analysis must address the impacts of new proposed fencing to protected species (bi-state sage grouse, bighorn sheep); the reduction of native forage available for bighorn sheep, mule deer and other species; impacts to water resources, water quality and riparian areas; the spread of invasive weed species; and impacts to recreational resources. These topics are addressed in more detail below.

#### **Allotment boundaries and adjacent lands**

We commend the Forest Service for proposing to reduce the allotment sizes, from

approximately 22,926 acres to 18,030 acres, however, further reductions should be considered as well because of potential impacts to Sierra Nevada bighorn sheep, Bi-State sage grouse, mule deer and other resources. Impacts to lands adjacent to allotments should be fully analyzed, along with maps including that include wilderness and roadless boundaries, roads, fencing, georeferenced locations of new water developments, their infrastructure and water source. Other designated lands should be included in allotment maps, such as the Green Creek and Summers Meadow Wildlife Area Units owned by California Department of Fish and Wildlife, and the Sinnamon Meadows conservation easement managed by the Eastern Sierra Land Trust.

### **Fencing**

The 22 miles of proposed fencing locations were scouted on May 24 and we do not believe the use of topographic features or other natural barriers, nor the assertion that the permittee will adhere to herding as a substitute for fencing is valid. It appears cattle could easily disperse over these ridgelines and access lands managed by Bureau of Land Management and the State of California. Protecting wilderness values is of particular concern for allotments with no fencing in and adjacent to the Hoover Wilderness. In addition, no fence-lines are proposed to separate the Jordan Basin Unit from Lundy Canyon to the south, a concern in that cattle could spill over into a core area used by Sierra Nevada bighorn sheep. Fencing can have significant impacts to wildlife including injuries and death from collisions, and providing perches for predators. It is a core management strategy to reduce or eliminate existing fencing in Bi-State sage grouse habitat. A comprehensive fencing inventory of existing fencing should be included in any environmental analysis, as well as much better maps. I found many confusing fence-lines on the edges of and within allotment boundaries. A non-live hot-wire was strung apparently on the edge of the Dunderberg Allotment that separated it from lands managed by the Eastern Sierra Land Trust in Sinnamon Meadow. Other fences not mapped in the proposed action were found in meadows near Dunderberg Creek.

### **Waterways**

The Forest Service must consider exclusion of grazing from all springs, seeps, wet meadows and other wetlands and buffers in all these allotments. The creeks found within the proposed allotments offer a variety of resources for fish, wildlife and people. Exclusion of grazing from all water resources should be considered in each alternative in the NEPA documents for all of these allotments. Cattle accessing springs, creeks and riparian areas are known to impact water quality and their associated bed and banks leading to increased potential for erosion, headcutting, and streambank alterations leading the increased siltation and bacterial water pollution as well. Microbial and nutrient pollution by livestock grazing on public lands degrades water quality. Contaminants include fecal indicator bacteria (FIB), fecal coliform (FC) and *Escherichia coli* (*E. coli*), as well as nitrogen (N) and phosphorus (P). Cattle preferentially graze meadows, springs and waterways due to high forage quantity and access to drinking water. The Forest must provide baseline data on water quality and, if cattle grazing is permitted, require frequent monitoring to measure water quality in these areas, protect water quality, and prevent eutrophication of streams. *E. coli* are indicators of fecal contamination and therefore can provide accurate assessment of water quality conditions and human health risks. The meadows, grasslands, streambanks, and hill slopes are recovering well from past sheep grazing impacts and should be allowed to rest until full

recovery.

### **Season of use**

A reasonable range of alternatives should include different and shorter seasons of use for these allotments to protect the resources on these allotments. For example, the Jordan Basin Unit, being higher elevation than many of the other allotments will likely have snowmelt and mud conditions during most years well into the summer. The EA should consider not allowing grazing to commence on this allotment until July at the earliest, in order to reduce impacts on native vegetation, soils and water resources. And, because this allotment Unit is quite close to the Lundy Canyon Sierra bighorn sheep core area, the alternatives should consider cancelation of all classes of livestock grazing on this unit.

### **Recreation**

This area is popular for camping, fishing, and hiking, as it presents several trail access points to the Hoover Wilderness and Yosemite National Park beyond. There are numerous dispersed primitive campsites within the proposed allotments. Any analysis must analyze how cattle will impact recreational users and wildlife viewing opportunities. The area is within and adjacent to recreational fishing units for non-native game trout: the Cattle Creek Fishing Unit, Virginia Creek Fishing Unit, and others may be impacted by cattle grazing. The EA must also analyze the impacts of cattle grazing in this area on these trailhead access points and recreational activities. It is necessary to discuss the status of visitor use, visitor satisfaction, and progress toward meeting recreation objectives in this part of the Forest. Multiple use opportunities may be better met in this popular area for hiking, camping, fishing, and wildlife viewing, without the addition of cattle grazing. The Forest has worked to increase the quality and quantity of developed and dispersed recreation opportunities and grazing and increased fencing could conflict with recreational values and these efforts.

### **Sierra Nevada Bighorn Sheep**

Proposed grazing allotments are within the Northern Recovery Unit for the Sierra Nevada Bighorn Sheep, a federally protected species. The Green Creek and Twin Lakes units contain suitable habitat where CDFW have observed animals in the past, and could be important areas for population expansion to reach recovery levels. The Mount Warren Unit overlaps the Jordan Basin and Dunderberg Allotments. This bighorn herd unit is considered essential for survival and recovery of the Sierra Nevada bighorn sheep as a whole (Sierra Nevada Bighorn Sheep Recovery Plan). Between 2003-2016 there have been multiple sightings of sheep within the Jordan Basin Unit, the western edge of the Dunderberg Allotment, and the high crest of Monument Ridge inside the Cameron Canyon Allotment, towards Summers Meadow. Lundy Canyon just to the south of Jordan Basin is heavily used by Sierra Bighorn sheep. The Recovery Plan states that: "...data on known bighorn sheep locations and predicted spring-summer and rut utilization areas indicate that bighorn sheep are likely to enter the Dunderberg, Tamarack, Cameron Canyon, Rickey (south), Green Creek (BLM), Dog Creek (BLM), Jordan Basin, Summer's Meadow...allotments at any time of the year, which greatly increases the risk of contact." The Recovery Plan also discusses domestic cattle grazing within bighorn sheep habitat not being well documented. Bighorn sheep may avoid areas where cattle have grazed and there is potential for cross species transmission of diseases between cattle and wild ungulates. It may be best to require annual testing of any cattle before they are allowed in these allotments for these and other diseases that could

potentially spread to bighorn. A No Livestock Alternative should also be explored. An EIS should include detailed mapping of Sierra bighorn critical habitat, herd units, and movement with respect to allotment boundaries, roads, proposed new fences, and nutritional supplements.

### **Bi-state Sage Grouse**

Bi-State sage-grouse in this area are managed in the Bodie Population Management Unit (PMU). Jordan Basin, Dunderberg, Cameron Canyon, and parts of the Summers Meadow Allotments contain excellent habitat for sage-grouse with recent sign present. Both winter and summer habitat was present, with dense sagebrush and bitterbrush. Brood-rearing habitat on shrub-meadow edges appeared to be of high quality and recovering from past sheep grazing. We found native grasses and forbs growing well in this ungrazed condition. The EIS should be consistent with the Bi-state action plan and management plans of the HTNF, where improvement of meadow and riparian habitats, proper design, location and development of livestock management facilities; and management strategies and incentives that encourage long-term maintenance and improvement of private rangelands in the PMU. The EA must consider how and whether the Forest can accomplish these and similar goals for the protection of sage grouse habitat if it permits cattle grazing to occur on these allotments.

### **Mule Deer and hunting**

Proposed allotments contain high quality, heavily used deer habitat. Cattle grazing can deplete mule deer browse and during our field visit we noted mule deer calving sites in Jordan Basin. These as well as hunting resources should be analyzed, as this area is a popular mule deer hunting area potentially compromised by cattle grazing.

### **Cultural Resources**

Cameron Canyon and Dunderberg allotments contain dense old aspen groves with many Basque arborglyphs. There are also sites with bedrock mortars in Cameron Canyon. Cattle can have negative impacts on growing aspen and mature trees, and an environmental analysis must assess how these and other cultural resources would be protected from cattle. The EA must also disclose whether there are National Register of Historic Places- eligible places within these allotments or other cultural resources and include a Cultural Inventory.

### **Conclusion**

Because of the great number of valuable resources found within the proposed allotments and the high risk of impacts to them, we believe that an Environmental Impact Statement is needed before issuing any decision on cattle grazing permits for these allotments. The Forest Service has the authority to decline grazing permits in order to protect endangered species without a plan amendment, and this should be analyzed in one or more alternatives. Thank you for considering these comments. Please reach out to us with any questions or concerns as this project moves through NEPA.

Sincerely,  
Jora Fogg  
Policy Director