

Via Email

February 8, 2021

Mono County Board of Supervisors
P.O. Box 715
Bridgeport, CA 93517

Re: Conway Ranch Management Plan and Lease Agreement

Honorable Supervisors:

Thank you for the opportunity to share my thoughts on the Conway Ranch management plan. I'm sorry I can't attend the meeting due to prior conflicts. Sadly, because this project is following the CEQA steps for a categorical exemption, there wasn't an opportunity for public input or comments from the agencies, especially CDFW. The collective knowledge of the public and public agencies about wildlife, plants, and ecosystems could make this a better plan. I assume the goal is to start cattle grazing this spring. Rather than rush, temporary measures can be used this year to reduce the thatch e.g. mowing or a controlled burn to allow more time for public input and wildlife surveys.

I agree the Hunewills will be good stewards of Conway and Mattly ranch lands, but I would like to see stronger protections in the plan for wildlife. The management plan should address how wildlife will be impacted in much more detail. Over the past four years walking through both properties frequently, I have observed mouse tracks, rabbits, rabbit scat, coyote scat, bear scat, groups of deer, deer droppings, sage grouse droppings, birds of prey, Great Blue Herons, Great Egrets, swans, Canadian Geese, ducks, butterflies, and two old beaver dams. As far as I can tell from the plan, a current analysis of the wildlife that uses the two properties is missing.

At the very least, I ask that you to consider adjusting the lease and management plan to address a few concerns listed below before approving it.

1. Survey for Bi-state Sage Grouse-The Bi-state Sage Grouse are in decline and may at some point be listed as a threatened species. They are known to have been on these two properties, Conway and Mattly Ranches in the past. Please properly survey both properties for sage grouse this spring before the cows are brought on. It is critical that we know what areas of the properties, if any, the sage grouse use and to establish a baseline. If the sage grouse use areas on the properties, within the grazing areas or elsewhere, we should monitor this annually. The 2014 ESLT Baseline Documentation Report says the last sage grouse survey was in 1988 and mentions sage grouse scat was observed in 2014 during the baseline assessment. The Fulstones reported seeing chicks on the property when they grazed sheep there. In October 2020, I took photos (and therefore have GPS coordinates) of sage grouse scat in low sagebrush between the aquaculture area and Wilson Creek. It was not present there for the three years prior that I had passed by walking dogs. To me it signals a change in use of the area by the sage grouse. If they are on the south side of Wilson Creek, where else are they? We should know that. Then we should evaluate how the sage grouse are doing each year

during the lease to determine if the cows have an impact on the sage grouse there or not. If so, then changes should be made to better manage the property for the sage grouse.

2. Grass height should be spelled out-Best management practices related to sage grouse recommend 7-inch grass height. The NRCS management plan does not specify a grass height. It just says the grass should remain tall enough to grow back. In practice, that is much shorter than 7 inches. If no sage grouse use the property, then following the NRCS best management practices would suffice. However, if there are sage grouse on the property, then the sage grouse need better cover and the lease should be changed to specify a 7-inch grass height and where. In support of the sage grouse, grass should be allowed to grow at the edge of the sagebrush with fencing a sufficient distance from the sagebrush to provide a buffer zone.
3. Safer fencing for wildlife- How will this extensive fencing affect wildlife? How high is the fencing? Why not make all fencing drop down fencing? Then deer could migrate through in the spring and fall without adjusting their route. It would reduce the risk of sage grouse hitting the fencing and would eliminate perches for ravens during the nesting season. Mono County has been participating in the BSSG LAWG and protecting the sage grouse whose main population is in the County. Perches for ravens, i.e. fencing, are the biggest threat for this species. Ravens raid the eggs so the sage grouse can't maintain or increase their population.

Flagging the fences is essential and I appreciate that it will be done, but it is still an electric fence. What happens if birds strike the electrified wire? Is an electric fence necessary? The NRCS management plan does not state that the fence should be electrified. I assume the fence will only be electrified when cows are in the pastures. How will this be communicated to the public? If the fencing isn't drop-down fencing, then signage should be changed to tell the public when the electricity is off. Lay-down fencing would allow locals to cross-country ski the meadows in winter.

4. Protect the creek-The cows should not be allowed in Wilson Creek or the Wilson Creek ravine. The ravine is a diverse and dense riparian corridor and heavily used by wildlife. The fencing should keep the cows out of the creek and out of the areas where it forms a pond behind the old beaver dams. The fencing map in the packet shows fencing right up to the pond. Migrating birds use that pond. It should not be muddied or filled with cow dung. The fencing should keep cows away from the pond and far enough away to account for high water years when the pond expands.
5. Leave meadow for pollinators-It appears that all the meadow area on the north side of Wilson Creek will be enclosed and therefore, unusable for wildlife. That leaves no meadow to support of butterflies and pollinators. Kristie Nelson has entered numerous observations in iNaturalist of insects and butterflies on Conway Ranch and on Mattly Ranch. I have walked through the meadow on the east side of Conway Ranch when it was full of butterflies. It would be another take-away to biodiversity when one of the goals of the easement is to maintain biodiversity. Please leave some of the meadow and clean muddy areas outside of the fenced area as butterfly and insect habitat. We should be preserving part of the habitat they use.

6. Retract fencing on west side of Mattly-The fencing map shows fencing on the east side of Mattly Ranch on or right up against the dirt road that runs north-south parallel to the creek. There is a power line to the west of this dirt road that would be enclosed. The fence should be to the west of it. People ride ATVs along that dirt road as well as walk their dogs there. A little bit of a buffer zone would be better for all.
7. Have a baseline for water quality-The watering map shows two irrigation ditches that leave a grazed area and then drain into Wilson Creek; one on Mattly and one on Conway ranches. Wilson Creek water quality should be tested annually for fecal coliform bacteria, TDS, oxygen, and nitrates downstream of Conway Ranch to ensure the water is clean. There are state laws requiring protection of water quality and limit the amount of fecal matter in a water body. The water should be tested prior to the cows coming on to the property to set a baseline. Please harden any areas where cows get water from the irrigation ditches, ponds, or springs on the property.
8. Assess in two years-Re-evaluate the biodiversity and health of the ecosystems after two years before automatically increasing the number of AMUs as is planned. Then adjustments can be made to the management plan as needed to prevent loss of biodiversity.

I would like to see the County include more protections and habitat for wildlife in the management plan before the Board of Supervisors approves it. An inventory of the wildlife and plants should be conducted by botanists and wildlife biologists who know the appropriate protocol for such surveys and the appropriate times of year to systematically collect this information for both breeding and migratory species. Information from the surveys would then feed into a more accurate and well-informed management plan. Many of us asked for this in 2017 and I ask it again.

Regards,



Lynn Boulton
Lee Vining

February 8, 2021

P.O. 349
Lee Vining CA 93541
deannad350@icloud.com

Subject: Concern about Grazing Impacts to Wildlife and Habitat at Historic Mattly Ranch

Dear Mono County Supervisors,

Greetings. Thank you for the opportunity to provide important comments on the proposed livestock grazing at the Historic Mattly Ranch area. I have not been engaged in the Conway Ranch planning, however, I have just recently learned that the Mattly Ranch area is now under consideration for livestock grazing with just a week notice to the public for comments on the proposed Categorical Exclusion on Mattly Ranch livestock grazing proposal. **For the record, I believe Mattly Ranch should be excluded from ranching and livestock grazing permits, and the existing status quo should be continued for the benefit of wildlife and habitat.**

The importance of protecting natural landscapes is heightened in our current times as increasing pressures of warming climates are exponentially increasing wildfire, droughts, and impacts to water availability impacts to wildlife. All of these and the additional stress of livestock grazing. would add yet another devastating effect on the quality of habitat and the viability of wild flora, fauna, and ecosystems. It is essential that *Climate Change and Adaptation Strategies* should be integrated into planning for current and future time frames, and these intensifying impacts in of themselves warrant removal of the proposal of livestock grazing at Mattly Ranch and support of wildlife sustainability. The decline of the health of the deer is well known. Yet another stressor added to their survival in the present and future as their ecological, migratory, and potential climate refugia are degraded effects deer, and sage grouse, and the web of life.

Additionally, and practically speaking it is not in the best interest of the county's resources as analyzing and administering a new ranching allotment in the Mattly Ranch area is costly and labor intensive. A categorical exclusion is not an appropriate environmental analysis. A CEQA analysis appears to be the proper legal approach to as Mattly livestock grazing is historic and is now a new proposed use. This would substantially increase the county's workload to comply with the CEQA requirements and would be a lengthy process to develop biological resource inventories, sound analysis by subject matter experts, clearly articulated the alternatives and impacts in the public comment process that a minimum would be an environmental analysis. Additional time would be required to develop mitigations that include robust inventory, monitoring, and adaptive strategies that need to be presented to the public for comment. However, if pursued, I am willing to contribute my naturalist knowledge to inform the environmental analysis of this living ecosystem and to develop strategies for wildlife.

Any potential use in the Mattly Ranch needs to be appropriately responded to that includes the Mono County residents (and taxpayers) who have a right to participate in decisions on public lands. This would include whether it is the highest use, most appropriate use, and to what level and extent grazing would occur, and what mitigations would occur and adaptive management strategies required. This folds into the CEQA requirement of a new use of land that would require biological/ecological inventory and assessments, monitoring and adaptive management processes. A current assessment is needed that addresses current conditions, projected conditions of impacts of a warming climate, and impacts on ecological and

migratory corridors. If livestock grazing were to occur, there also need for a CEQA analysis and provisions that address water use in the area that prioritizes adequate water for wildlife and with reductions in A.U.Ms in drought years.

Cultural Resources: Has the Historic Mattly Ranch been inventoried and evaluated for cultural resources and submitted to State Historic Preservation Officer for a categorical exemption for this proposed non-historic use?

Additionally, the Mattly Ranch area both including the road and also the adjacent landscape has become a recreational area for multiple uses of wildflower wonders, bird and wildlife watching, mountain biking, running, and hiking, and in winter cross country skiing.

Is fencing a realistic solution? Fencing is a necessity if grazing occurs, however the best solution is no livestock grazing. The perimeter of the fences must take into account the needs of the deer and other wildlife needs and movements and must be wildlife friendly in height and lack of barbs. Fences must not limit access for wildlife from the canals were wildlife access water. The NE corner of the meadow must not be fences as it includes a drainage from the slope above to critical cover area for wildlife with water and cover for deer and wildlife. Fences need to limit the meadow acreage and also prevent cow trespass into the vitally important aspen groves above the Historic Mattly meadow. This is important as cows trampling in the aspen groves would be disruptive to the does and fawns there, as well as competing for the delicious and nutritious greens growing in this wet and shaded areas. **To prevent this loss of fawning areas, cover, shelter and food, it is much easier to not permit ranching and the imperfect mitigation of fencing, and to choose to protect habitat and wildlife where fencing would not be needed.**

It is of high importance to develop biological resource inventories, sound analysis by subject matter experts, and clearly articulate the alternatives and impacts in the public comment process that at a minimum would be an environmental analysis. Developing mitigations that include robust inventory, monitoring, and adaptive strategies need to be presented to the public for comment. If ranching analysis of alternatives proceeds, adequate mitigations must be identified and budgetary resources of inventory and regular monitoring and management for adequate oversight that the terms and conditions of the permit are adhered to, and an adaptive management strategy for impacts to wildlife including sage grouse, deer, ecological and migratory corridors, vegetation and recreational impacts.

Governor Newsom announced on October 7, 2020 a statewide policy to protect 30% of CA by 2030 and that manage public lands including state lands are to be managed for their biodiversity, as natural solutions to climate change, and life support systems as a strategy for a livable planet. The importance of these livable ecosystems are vital for the survival of fabric of life that we so appreciate, and don't want to disappear due to lack of foresight.

As I travel the road corridor along 395, there is a substantial amount of grazing along the road corridor, and some of these are likely to remain, so this is an opportunity to leave some of the scenic corridor of highway 395 beautiful open space where wildlife is thriving and the chance of a lucky sighting of a wild creature in a wild place in Mono County known as a county "Wild by Nature."

Sincerely,
/s/Deanna M. Dulen

Attachment: Citizen observations of wildlife in the Historic Mattly Ranch meadows

Attachment: Citizen observations of wildlife in the Historic Mattly Ranch meadows

As a long-term Mono County resident since 1991, I have hiked on the Mill Creek Power Plant road, hill sides, meadows, and adjacent to and up the road to Jordan Basin observing the cycles and movements of deer and fawn, meadowlarks, sage grouse, towhees, bluebirds and lazuli buntings, hawks, and vultures. I watch the tracks of bobcat, badger, foxes, coyotes, and small mammals, and mountain lions whose survival is woven into this ecosystem. Of note, Mono County's bobcats are just beginning to recover from a very targeted trapping for their fur for both legal and illegal export, which has been stopped with the trapping ban on bobcats.

During the spring bloom in the sagebrush, there is a spectacle of colors of mule's ears, arrowroot, lupine, penstemon, and several species of lilies in the Mattly Ranch meadow areas and in the aspen groves. Although at a first appearance this may appear as a monotone of sagebrush ocean, this is a flourishing web and circle of life. Walk quietly amidst the vibrant spring festival of color and listen to the singing meadowlarks and courting towhees and bluebirds, sage grouse and their chicks in a scurry for safety

For decades, I have been watching the resident herd of does, juveniles, and fawns traverse the slopes about the road and then descend down into the NE corner of the meadow where there is a slight depression when spooked by people or vehicles. I have also seen them grazing on the meadow grasses. As the does are fawning there are several day beds, that when thirst and hunger compel them to descend across the road to the meadows below and also as the seasons progress to the aspen groves that are above the meadow.

We are all sadly and keenly aware of the increased stresses on humans and landscapes from the accelerating climate crisis of increasing heat and drought stress on meadows, forests, and ecosystems. However, although we may not yet know the specifics of impacts to the great and small creatures in our shared "Wild by Nature" Mono County, it is logical that losing yet another open space where wildlife is dependent there will be negative impacts on their habitats. These will occur throughout the seasons and their lifecycles and disrupt the food & habitat and denning, and their movements both during the spring, summer and fall, and also many of the deer in the Jordan Basin road corridor coming from Jordan Basin to descend to this meadow habitat and then move eastward through both Mattly and Conway ranches to the east and their overwintering sites.

February 8, 2021

To: The Mono County Board of Supervisors

Mono County Staff: Justin Nalder, Tony Dublino

From: Ilene Mandelbaum

Re: February 9, 2021 BOS Meeting Agenda Item: Approval of Categorical Exemption and Cattle Grazing Lease on Conway and Mattly Ranches

I am writing to request that the BOS refrain from approving the Categorical Exemption and Cattle Grazing Lease on Conway and Mattly Ranches at this time. I disagree with the staff's conclusion that granting a cattle grazing lease is not a new activity that requires further analysis under CEQA. Rather, it is a decidedly different activity which has not occurred on the property for likely a century or more.

I ask that the BOS direct staff to undertake a CEQA analysis for the proposed action that is based on updated environmental surveys of sensitive resources on the property, which have yet to be conducted, and that include a comprehensive analysis of potentially significant impacts to all resources.

The County must also consider alternatives to the proposed action, avoidance and minimization of those impacts and mitigation measures. Any decision must also include comprehensive monitoring requirements to ensure impacts are not greater than expected.

There must also be an adequate public comment period included in the CEQA process. The BOS is meeting on this issue one day before the Mono Basin RPAC meets. The RPAC requested many months ago that it receive updates on any leasing proposals and opportunities for discussion before any actions are finalized by the County. Ever since the possibility of a cattle grazing lease has been on the agenda for discussion in BOS or RPAC meetings, staff and BOS members have stated repeatedly that there would be a robust CEQA analysis on any proposals that come forward. This was, I believe, in recognition of the long standing public interest in this County-managed public property.

I want to acknowledge that Mono County has invested considerable staff time devoted to the hands-on management of property infrastructure, seasonal irrigation and other

resource management. Staff have also produced Operations Reports and Plans, a Draft Facilities Operations Plan with some public input, and have solicited production of other reports, such as the NRCS Grazing Management Plan. These are all steps in the right direction.

The Eastern Sierra Land Trust (ESLT) states in their Conservation Easement Management Plan, under:

“(d) Public and Agency Involvement in the Management and Operations Plans”

“Mono County will provide the annual Operations Plan prior to a public meeting each year in the Lee Vining area so that interested parties can provide comments and input. Updates and changes to the Management Plan will also be provided to the public prior to this meeting. Interested federal and state agencies, including the original grant Funders, will be notified and invited to participate.”

I do not believe that this has ever happened.

Rather, actions concerning Conway Ranch have been single-issue driven, concerning, initially, a fish hatchery, then whether or not to renew sheep grazing, and now whether to grant a cattle grazing lease. All the while, community members and commenting biologists have urged the County to update surveys of biological resources and environmental conditions-including rare, sensitive or endemic plants, animals and insects, including the pygmy rabbit, the Bi-State Sage Grouse and resident and migratory deer, butterflies, soils and water quality.

Alternatives for fuels management and rejuvenation of meadow habitats such as mowing and controlled burns should be considered in a CEQA analysis. A monitoring plan should include control areas from which new activities are excluded.

An alternative is that Mono County that has been previously suggested is to pursue acquisition of the property by the State as a Wildlife Area or Reserve. It is important that such an action would not be precluded by granting a grazing lease.

In addition, Conway and Mattly Ranches have become increasingly important recreational assets to Mono Basin residents and to the adjacent community of Mono City which has grown considerably since the property was acquired by Mono County. Diverse activities occur year-round, including hiking, botanizing, animal, bird and butterfly watching, dog walking, running, bicycling, skiing, swimming, photography and appreciation of historic ranch structures.

Recent mention has been made of grants available for recreational improvements. It would be ideal if consideration of such proposals were conducted within a comprehensive approach to ranch management with thoughtful public involvement and with baseline data, rather than in a fragmented manner. An oversight committee or working group of citizens and involved agencies for comprehensive planning for Conway Ranch has been requested throughout the years but never been formed.

The bottom line is that cattle grazing is a new activity bringing with it new actions and new impacts. Fencing will occur in areas never fenced before. Yet how will cattle be excluded from sensitive habitats such as willow thickets and bogs within fenced areas?

There have been only four years of recovery after a century of sheep grazing. The value of recovery and restoration of biologically diverse native meadow ecosystems, healthy landscape linkages for migratory and nesting species such as mule deer and sage grouse, improved water quality and water holding capacity and restoration of degraded portions of the property, all should be part of the analysis. Recovery of sensitive resources is likely to be impeded. Potential impacts on sensitive resources are likely to be significant and need to be analyzed. The Conservation Easement Management Plan requires that sensitive resources not be impaired. Desired conditions should be defined to be more than maintaining forage for livestock.

Thank you very much for your time and consideration of these comments.

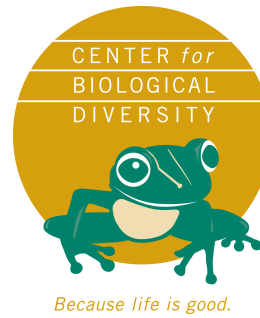
Sincerely,

Ilene Mandelbaum

PO Box 89

Lee Vining, CA 93541

monogreens@aol.com



Board of Supervisors, County of Mono
c/o Clerk of the Board
Shannon Kendall
PO Box 715
Bridgeport CA 93517

February 8, 2021

Justin Nalder
Mono County Department of Public Works
PO Box 457
74 N. School St.
Bridgeport CA 93517

Via email: skendall@mono.ca.gov, jnalder@mono.ca.gov.

RE: Conway Ranch Agriculture Management Project and Lease Agreement

Dear Mr. Nalder and Honorable Supervisors,

We are providing comments on the agenda item 7E for the February 9, 2021 Board of Supervisors meeting concerning converting a currently ungrazed ranch property in the Mono basin that was a prior sheep ranch, into a 5-year lease for cattle.¹

Western Watersheds Project is a non-profit organization with more than 12,000 members and supporters. Our mission is to protect and restore western watersheds and wildlife through education, public policy initiatives, and legal advocacy.

The Center for Biological Diversity is a non-profit environmental organization dedicated to the protection of native species and their habitats through science, policy, and environmental law. The Center has over 1.7 million members and online activists with over 70,000 members throughout California and the western United States. The Center and its members have worked to ensure the conservation of the Sierra Nevada bighorn, Bi-state sage grouse and many other listed, rare, and special status species and their habitats in this area that may be adversely affected by the proposal to allow cattle grazing at Conway Ranch.

1

https://www.monocounty.ca.gov/sites/default/files/fileattachments/board_of_supervisors/meeting/31128/02_feb_09_2021_agenda_packet.pdf

The proposed Mono County Lease Agreement with the Hunewill Land and Livestock Company, Inc. pertains to seasonal grazing of cattle on Conway Ranch, related water pipelines and watering facilities, and the construction/reconstruction of fences.

A proposed ordinance would amend Mono County Code chapter 13.40, Public Use of Conway Ranch, to implement public access restrictions to cattle grazing areas during grazing season. Mono County would receive lease fees from the grazing of cattle on Conway Ranch. Mono County Department of Public Works recommends approving a 5-year lease for seasonal cattle grazing on Conway Ranch using a categorical exclusion CEQA Guidelines Section 15301 (Class 1: Existing Facilities), Section 15302 (Class 2: Replacement or Reconstruction), or both.

Because cattle grazing is a new use that will impact resources including vegetation and water quality, and fence construction and reconstruction may significantly affect species such as sage grouse, additional environmental review is needed. The County must fully analyze the potentially significant effects of cattle grazing season-long in meadows and riparian areas above Mono Lake, a prized national recreation area and containing sensitive ecological resources, bird habitat, and important migration stopover habitat along the Pacific Flyway.

In addition, evidence of sage-grouse has been found in the Conway ranch since cessation of sheep grazing three years ago, as habitat for these declining species is recovering. Sage-grouse require a minimum of 7 inches of grass height as cover from raven predators, which are attracted by livestock watering facilities and carrion associated with stillbirths and carcasses. Fencing provides perching opportunities for predators and can significantly impact sage grouse. The design and placement of new or reconstructed fencing must be considered in that context.

The Bi-State Distinct Population Segment of greater sage-grouse is in severe decline, especially away from the core areas of the Bodie Hills. As you are aware, Desert Survivors, Center for Biological Diversity, Western Watersheds Project, and Wildearth Guardians sued the U.S. Fish and Wildlife Service in September 2020, for failing to protect this imperiled bird under the Endangered Species Act.²

In addition, we are concerned about water quality impacts of cattle grazing and manure management on springs and streams that drain from the Eastern Sierra slopes into Mono Lake and that the Lahontan Regional Water Quality Control Board (LRWQCB) has not been consulted regarding potential impacts. The LRWQCB has authority to regulate grazing activities that may discharge fecal coliform and nutrients, and sediment discharges as wastes that could affect the quality of the waters of the State. *See* Water Code Section 13260 *et seq.* Additionally, the LRWQCB has authority to regulate grazing activities as non-point source discharges. Even if Best Management Practices (BMPs)

² <https://biologicaldiversity.org/w/news/press-releases/lawsuit-aims-compel-fish-and-wildlife-service-protect-bi-state-sage-grouse-2020-09-29/>

are adopted, voluntary BMPs may not be sufficient to protect water quality and beneficial uses, including for example, erosion problems, destruction or major impairment of vegetation, or significant addition of nutrients, pathogens and/or sediments to surface waters or ground waters resulting from grazing or grazing management activities.

Additional environmental review of potential impacts to water quality is required and the LWQCB should be included in that process. Because the proposal does not currently address water quality or require any water quality sampling, it will be impossible for the LRWQCB, the County or the public to know if degradation of water resources occurs. At minimum, the County must obtain baseline water quality information in various seasons at appropriate locations before any grazing begins and require regular (e.g. monthly) water quality testing at appropriate locations thereafter.

New water conveyance pipelines and watering troughs are proposed for cattle grazing, which could have unanalyzed impacts on bird and wildlife habitat both on the ranch property and in adjacent Mono Lake. Impacts to Mill Creek and Virginia Creek of new water diversions must be analyzed as well, as these new diversions could also impact Mono Lake.

Any concern about ungrazed thatch build-up and fire fuels should be analyzed in alternatives that include no grazing and wildlife conservation, as well as using temporary cattle grazing in short-duration periods such as a few weeks to reduce thatch in years where it is determined to be needed based on specific criteria. Mono County purchased Conway Ranch because of its high conservation values and functions, including wetlands, wildlife habitat, and scenic, open space, public access, and historic values. (NRCS Management Plan at p. 3; Conservation Easement, Recital C, at p. 2.). The County in 2014 further preserved Conway Ranch by granting a conservation easement to the Eastern Sierra Land Trust that restricts future development of Conway Ranch while preserving the potential for historic and conservation uses. (Conservation Easement, ¶ 2, at p. 8.)

The conservation easement ensured that the Conway Ranch property would be retained forever in its relatively natural, scenic, and open-space condition and the Conservation Values would be protected; plant, wildlife species and habitat, such as wildlife migration corridor (mule deer, mountain lions) resident wildlife, songbirds and waterfowl, plant and butterfly species would be protected; surface and groundwater resources and the wetlands, meadows, riparian habitats, and perennial freshwater springs that they support would be conserved; as well as protect open space and scenic resources. (Id., ¶1(a)-(g), at p. 7.)

Yet the County is proposing now to restrict public access to proposed cattle pastures, in an era when access to open spaces for a diversity of people is even more needed.

Livestock grazing is allowed in the easement provided their management/use does not impair any stated Conservation Value. Cattle can have large negative impacts on

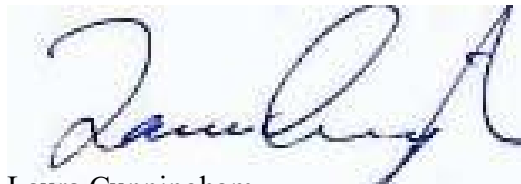
water quality, riparian areas, meadows, native plants and plant communities, pollinators, sage-grouse, and other wildlife. These potentially significant impacts need to be fully analyzed before a decision is made.

We fully supported Mono County's decision to end domestic sheep grazing on Conway Ranch in 2017 because of concerns with proximity and disease transmission to a nearby endangered Sierra Nevada bighorn sheep population in Lundy Canyon. Yet cattle can also transmit some diseases to bighorn sheep, and this should be not be ignored.

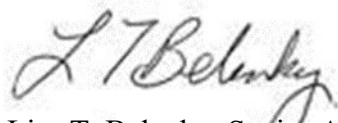
We request that before the County make a decision on this matter, additional environmental review is conducted considering all of the potentially significant impacts of new cattle grazing at Conway Ranch and that the environmental review be circulated for public review and comment.

Thank you for considering these comments. Western Watersheds Project and the Center for Biological Diversity thank you for this opportunity to assist Mono County by providing comments for this project. Please keep Western Watersheds Project and the Center for Biological Diversity informed of all further substantive stages in this process and any available documents by contacting us at lcunningham@westernwatersheds.org and lbelenky@biologicaldiversity.org.

Sincerely,



Laura Cunningham
California Director
Western Watersheds Project
Cima CA 92323
Mailing: P.O. Box 70
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From: Zane Davis <zwdavis08@gmail.com>
Sent: Monday, February 8, 2021 5:51:18 PM
To: Shannon Kendall <skendall@mono.ca.gov>
Subject: Conway Ranch

CAUTION: This email originated from outside of the organization. Do not click links or open attachments unless you recognize the sender and know the content is safe.

February 8, 2021

Mono County Board of Supervisors
P.O. Box 715
Bridgeport, CA 93517

Re: Conway Ranch Management Plan

Honorable Supervisors:

I am an 81 year old resident of Mono City and I have lived here for about 30 years. Over the years, I have watched the Conway Ranch area undergo countless transformations and each time I wonder, why? Why can't this little piece of land that is so accessible and appealing just be left alone? *Why does it have to be used?* Surely this methane-rich planet does not need more cows. I have walked through many woods and grasslands that have cattle on them and the experience is frankly revolting. I wonder how long it will take for the land to recover from the trampling, nibbling and piles of excrement.

I walk my dog there regularly and the variety of landscape and the seasonal changes delights my heart and that of my dog as well. Years ago before the area was fenced off for a trout hatchery (much preferable to cows), I vividly remember an explosion of sage grouse bursting up in front of me. Might they return if you left the land alone?

Even though the cattle will be fenced, something any respectable dog can thwart, I will not be able to take my dog there any longer, or if I do she will be restrained by a leash, dragging me behind her as she yearns to reach those rich odoriferous cows. I cannot think of another patch of land in the basin that is so varied and delightful. Almost everywhere else, I must weave my way through mile after mile of thorny bushes.

Now I know this pathetic cry from one octogenarian will have little impact. I have no great knowledge of the law or natural science. I do hope that you will not rush this through and take the time to do a thoughtful evaluation of the potential damage that ranching will do to the plants and wildlife. Please give us more time before you approve this and please, please, carefully consider the damage this might do to a lovely place that I love to walk in and know that you are sentencing me to scrubbiier, dryer walks elsewhere.

Carolyn J. Crawford Davis,
Mono City

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Zane and Carolyn

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