



March 6, 2020

Dear BLM,

Thank you for the opportunity to comment on the BLM Grazing Revisions. I write to you today as the volunteer leader of our local chapter of Great Old Broads for Wilderness. Great Old Broads for Wilderness is a national organization, led by women, that inspires and engages activism to protect wilderness and wildlands. We place a particular emphasis on maintaining expansive landscapes for wildlife habitat and corridors as well as attention to ecosystem integrity and resilience in the face of increasing recreation demands, growing populations, and climate uncertainty including but not limited to drought, less snowpack and wildfires.

Our Northern San Juan chapter representing over 450 supporters ranges geographically across Delta, Montrose, Ouray and San Miguel Counties in southwestern Colorado where, as you probably know, livestock grazing is integral to our agricultural economy and the history and culture of the region. Though we honor the ranching traditions of our region, we are gravely concerned about the proposed BLM grazing revisions. In addition, to commenting on the revisions, we want to express our strong, unequivocal support for the alternative submitted to the BLM by several conservation groups and ask that this conservation alternative be included in the Draft EIS and analyzed alongside any alternative proposed by the BLM.

Though not exhaustive, we would like to share the following concerns with BLM's proposed grazing revisions:

1. **Expediting grazing authorizations as “a tool to reduce wildfire” or to “improve rangeland conditions.”** Our members are active outdoor men and women and we witness the impacts of grazing on our public lands. No scientific evidence exists to indicate that grazing can achieve fire reduction or rangeland health. Moreover, scientific literature demonstrates that grazing promotes just the opposite since it has been shown that grazing leads to the increase of invasive annual grasses, a reduction in biodiversity and a tendency toward larger, more frequent wildfires.
2. **Overlooking unauthorized grazing.** We oppose any attempt to weaken or undermine regulations related to overgrazing, trespassing, or grazing outside the permitted dates. We expect the BLM to comply with existing regulations that hold permittees accountable, document non-compliance and impose penalties for unauthorized grazing.
3. **Expanding exclusions for land health assessments and environmental analyses.** The BLM is required to complete analysis of Land Health Fundamentals and Standards as part of the annual permit renewal process. We are aware that currently many allotments do not meet the standards and the proposed revised regulations appear to weaken a prescription that is already not protecting our public lands from degradation due to grazing.
4. **Increasing the use of Categorical Exclusions and limiting opportunities for protest and appeals.** Both these revisions will result in reduced public participation and opportunities for public input. As residents who live within agricultural communities, we adamantly oppose any reduction in public participation regarding the use and health of our federal lands.

We support revised grazing regulation that would:

- Require use of the best available science in livestock grazing decisions.
- Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands.
- Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species.

- Ensure grazing management does not impede grazed lands from serving as habitat for native predators.
- Forbid destruction of native vegetation to increase forage for livestock.
- Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis.
- Set a fair and equitable grazing fee based on comparable private land prices.
- Allow for grazing permit retirement and long-term non-use for conservation purposes.
- Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods.
- Include water quality monitoring as part of the land health evaluations.
- Include an accurate and site-specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.
- Disclose underlying Indigenous land claims and address environmental justice issues.

To this end, we support the alternative submitted by conservation organizations and below we highlight some of the conditions outlined in the conservation alternative.

1. **30% utilization.** If there is any one thing that would make grazing management more efficient, it would be conservative utilization, which would mean less riparian trampling, less invasive species, less erosion. A key document is Holechek's review of utilization rates and the benefits of conservative utilization for both the permittee's finances and the ecological condition of the land.
2. **Non-use.** The alternative allows non-use annually for up to ten years into permittee options at several places.
3. **Review of allotment health conditions** at least every ten years.
4. **Native species.** Planting or seeding of non-native species is prohibited except in rare cases where native plants cannot solve a specific problem.
5. **Public accountability.** The alternative requires public input, response to public concerns, and reporting of outcomes, all for accountability to the public about consequences of grazing.
6. **Monitoring thresholds.** The triggering of a change of course (adaptive management) depends on both quantitative thresholds that require changes in an activity when crossed, and monitoring to detect whether thresholds have been crossed.
7. **Predator control.** Non-lethal only.
8. **Permittees waiting on the edges.** Deletes current regulations that allow permittees to use allotments temporarily that for approved reasons aren't being used by the current permittee.

Our organization feels strongly that these proposed changes in the conservation alternative are scientifically-based and would enhance the health of our public lands. Again, we urge the BLM to consider the conservation alongside BLM alternatives and to include it in your DEIS.

Thank you again for considering our concerns and recommendations.

Sincerely,
 Robyn Cascade, Volunteer Leader
 Northern San Juan chapter
 Ouray County, Colorado