

Below are excerpts from the comments on the BLM's new grazing regulations that were prepared by the staff of the U.S. Fish & Wildlife Service. Like the draft environmental impact statement prepared by BLM staff, these comments were suppressed by higher management. They were never signed by the Director of the USF&WS and were not formally transmitted to the BLM.

Excerpts:

"Overall, we are concerned that the Proposed Revisions have the effect of making grazing a priority use over other uses. This seems contrary to the regulations in the Federal Land Policy Management Act which specify multiple uses, but do not prioritize them. Additionally, the Proposed Revisions constrain biologists and range conservationists from recommending and implementing management changes based on their best professional judgment in response to conditions that may compromise the long-term health and sustainability of rangeland resources. Taken together we believe these aspects of the Proposed Revisions have the potential to be detrimental to fish and wildlife resources."

...

"Removing some requirements to consult with the "interested public" while adopting a requirement to cooperate with State, county, or locally established grazing advisory boards (PR section 4120.5-2) conveys preferential treatment to one group over another. We believe adopting this modification is inconsistent with current Department of the Interior objectives to promote coordination, cooperation, and consultation with all entities to accomplish conservation."

...

"By removing public comment opportunities from daily or seasonal grazing operations, the public is essentially removed from any substantive decision-making processes."

...

"The 5-year implementation period [for instituting reductions in livestock numbers to protect rangeland health] may be too long to begin necessary and effective range management changes (for example, in the event of extended drought) and thus result in irreversible long-term impacts to vegetation communities and associated wildlife species."

...

"By relinquishing ownership [of range improvements], the BLM compromises its ability to manage the public's resources to the degree necessary to ensure their health."

...

"[A]llowing [ranchers to have] title to certain permanent range improvements gives away some of the public rights on public lands."

...

[Regarding the proposed provision that a rancher's permit cannot be revoked or suspended as a result of his or her violations of environmental laws, unless the violations occurred on his or her own grazing allotment:] "Under the proposed amendment, the owner of the trespassing livestock that are found on NWR [National Wildlife Refuge] lands, for example, would no longer risk loss or suspension of his BLM grazing permit. Such a change communicates to permittees that attention to a healthy rangeland ethic ends at their permit boundary. It is highly likely that adopting this modification may result in more trespass violations on NWRs, with significant adverse effects to fish and wildlife resources the Service is mandated to protect, as well as increased operational expenses by the NWR.

We, therefore, believe the proposed amendment not only contradicts the objectives of the Proposed Revisions, but also the direction of the Department of the Interior to promote conservation through cooperation and coordination among agencies and the general public."

...

"Extending the deadline for initiating an appropriate course of action to make remedial changes in grazing practices that significantly contribute to an allotment's failure to meet rangeland health standards from 12 to 24 months could be extremely detrimental to long-term range health and fish and wildlife resources."

...

"The Proposed Revisions would change fundamentally the way the BLM lands are managed temporally, spatially, and philosophically. These changes could have profound impacts on wildlife resources. "

...

"The Service is concerned that, by extending the amount of time the BLM would take to make needed grazing changes to ensure that resource conditions conform to the requirements, resources necessary for the long-term conservation of sage-grouse may become increasingly degraded during the interim."

...

"Giving up water rights inhibits the BLM flexibility in making management decisions and has the potential to impact water resources. "

. . .

"We believe that many of the Proposed Revisions would give priority to a use that is often in competition with fish and wildlife resources, and thus could be detrimental to fish and wildlife habitats and populations."