

Excerpts from the internal draft DEIS - written by BLM staff and then squelched by top BLM political management.

“The Proposed Action will have a slow, long-term adverse impact on wildlife and biological diversity in general. Upland and riparian habitats will continue to decline due to increasing an already burdensome grazing appeals process, lack of ability to control illegal activities on public lands, and allowing livestock operators to acquire rights to livestock management facilities and vegetation on public lands. The cumulative effects resulting from all these changes will be significant and adverse for wildlife and biological diversity in the long-term..”

...

“In terms of improving working relationships with permittees and lessees, explicitly stating and emphasizing in the grazing regulations that the economic, social, and cultural elements be considered in when making grazing decisions will tend to give emphasis of these considerations over natural resource considerations, such as wildlife and special status species.”

...

“[B]y establishing ownership of water or range improvements the livestock operator will have the right to graze and greatly diminishes the ability of the BLM to regulate grazing and will create long-term impacts to wildlife resources.”

...

“Authorizing joint title to range improvements will have very long lasting adverse impact to the wildlife of the public lands in the West.”

...

“Deferring to state water law, as in the case of Nevada, where they prohibit the BLM from holding water rights will have a long-term, adverse impact on wildlife, particularly fish.”

...

“Amending when BLM will make changes in grazing management when not meeting land health standards from the present requirement of the next grazing season to 24 months and that any adjustment in active use in excess of 10% must be implemented over a 5-year period could have significant and long-term adverse effects upon wildlife resources and biological biodiversity in general, but could be especially problematic for many of the special status species on public lands, especially plants.”

...

“1. Grazing decisions would require not only a land health assessment, but also monitoring data. BLM, in fact, lacks sufficient funding and staffing to perform adequate monitoring.

2. After a grazing decision record of decision there is a 2 year period allowed prior for making any changes in the grazing operation.

3. Proposed changes in active use greater than 10% would require a 5 year phase-in period.

All of these cumulative delaying tactics could result in a protracted 7 year period for full implementation and change and thus would result in a long-term, adverse impact upon wildlife resources and biological diversity, including threatened and endangered and special status species.”

...

“The additional provision that determinations that existing grazing management practices or levels of grazing use are significant factors in failing to achieve standards and conform with guidelines must be based on not only the standards and guidelines assessment, but also include monitoring data will further delay the grazing decision process. Present BLM funding and staffing levels do not provide adequate resources for even minimal monitoring and the additional monitoring requirement will further burden the grazing decision process, thus adversely impacting wildlife resources and biological resources in the long-term.”

...

“Adverse, historic impacts which have been realized on riparian obligates and dependent species, especially fishes and migratory birds, will be exacerbated under the Proposed Action largely due to the inherent inability to make livestock adjustments due to increasing the burdensome grazing appeals process.”

...

“The change in definition of ‘interested public’ will limit the ability of environmental groups to participate in the appeals process in the interest of wildlife. . . . This should result in long-term, adverse impacts to wildlife and special status species on public lands”

...

“The deletion of the requirements to consult, cooperate and coordinate with or seek review and comment from the “interested public” for designating and adjusting allotment boundaries, reducing permitted use, emergency closures or modifications, renewing/issuing grazing permit/leases, modifying a permit/lease and issuing temporary non-renewable grazing permits will further reduce the ability of environmental groups and organizations to participate in weigh in and support wildlife and special status species with regard to public land grazing issues. This should result in long-term adverse impacts to wildlife and special status species on public lands.”

...

“The requirement for the BLM to cooperate with State, local, or county established grazing boards in reviewing range improvements and allotment management plans on public lands will result in giving permittees and lessees greater access to the decision making process at the

expense of conservation groups who are advocates for wildlife resources. First, this requirement will give greater emphasis to local entities who favor extraction of forage and water resources at the expense of wildlife and biological diversity. Secondly, this requirement will give local entities greater influence over decision making than national interests who are excluded from this venue. This would be a long-term adverse impact for wildlife and special status species resources.”

...

“The proposed action will provide additional tools to exacerbate long term impacts on riparian habitats, channel morphology and water quality. Degradation of channel morphology and water quality will continue in watersheds with declining vegetative cover due in-large to the increasing and burdensome administrative procedural requirements for assessment and for acquisition of monitoring data.”