

**April 4, 2016**

Please accept these comments from Great Old Broads for Wilderness regarding the San Juan National Forest's proposed action to better manage grazing on the Weminuche Landscape. While much of the information provided is good, we feel the ultimate preferred alternative does not meet the public's interest nor protect forest resources.

In some aspects we believe the Weminuche Landscape Grazing Analysis Draft Environmental Impact Statement (DEIS) does not provide a thorough description and analysis of the environmental consequences of the proposed action and its alternatives. While the proposed action is a positive step forward it fails to accurately reflect economic reality, it fails to ensure protection for and the ability for increases in rocky mountain bighorn sheep populations, and it fails to allow for the closure of long vacant grazing allotments.

The DEIS makes several key conclusions that are unsupported in the analysis of impacts. For example, the DEIS states that Alternative No. 1, No Grazing, would put "ranching families out of business" however, the Socioeconomic analysis does not support this statement. In addition, the Purpose and Need statement is too restrictive, there is an inadequate comparison of the impacts of the alternatives, there is a failure to properly describe the impacts on the Wilderness experience, the No Action Alternative and Action Alternatives are improper, the Socioeconomic analysis fails to adequately describe the adverse and beneficial impacts of the alternatives, and the DEIS fails to adequately address the immediate and long-term and cumulative impacts of climate change. As a result of these and other concerns, we believe a Supplemental DEIS is required.

The following comments are intended to provide background for each question or request for information (Q). Please respond to each (Q).

We appreciate the consideration of our comments. Please do not hesitate to contact me if you wish to discuss.

Thank you

Rose Chilcoat  
Associate Director  
Great Old Broads for Wilderness



**Comments on the  
Weminuche Landscape Grazing Analysis Draft Environmental Impact Statement**

Comment - The DEIS states,

Based upon the effects of the alternatives, the responsible official will decide whether livestock grazing will proceed as proposed, as modified, *or not at all* (Italics added) (p. iv)

As shown by Table 2-7, Alternative No. 1, No Grazing, has the least environmental impacts of all alternatives on every resource including Natural Resources, Water Quality/Soils, Vegetation, Recreation, Wildlife, Cultural Resources, and would benefit the region's Socioeconomic condition. Absent a dramatic change to the analysis in the FEIS, it appears Alternative No. 1 should be selected.

Q. Please provide documentation, analysis, or other support for the statement in Table 2-7 that Alternative No. 1 will, "put ranching families out of business". Even if that statement could be substantiated, why is the loss of a marginal business opportunity by a few small business owners more important than the substantial economic benefits that would accrue to other business owners and to the American people with the removal of livestock grazing from the allotments?

Comment - The DEIS comments that "additionally, the permittee is not interested in allotments which would require trucking sheep from his base property because of increased costs." Agencies routinely impose restrictions that increase costs for commercial and non-commercial forest users and permittees.

Q. Why is this being used as justification for renewing grazing on the allotments in these landscapes?

Comment - As shown by Table 2-7, the only adverse impact of Alternative No. 1 is the Socioeconomics impact, "putting ranching families out of business". However, Chapter 3's discussion of impacts does not describe that one, or more, ranching families would be put out of business. The DEIS states Alternative No. 1 would,

create enormous burdens in terms of operating costs, and potentially detrimental for those nearing, or already financially non-viable operations and are economically dependent on federal grazing.... the elimination of federal grazing substantially increases the permittee's operation costs.... costs on the permittees *may* not be offset by revenues from marketable gains of livestock, making the ranching business financially non-viable. *This analysis alone cannot predict that the permittees would cease livestock operations or put the base property up for sale. Typically, many factors contribute to such a decision.* (Italics added) (p. 176)

The analysis indicates only that Alternative No. 1 may result in potential financial difficulties and the Analysis specifically indicates it is not able to determine if Alternative No. 1 would make ranching financially non-viable. The DEIS states,

public land ranchers were asked a series of questions regarding possible strategies when faced with different scenarios, for example, the elimination of seasonal uses of

federal grazing and reducing AUMs. For the 'sheep herder ranchers' group, when faced with the hypothetical prospect of elimination of federal grazing in the summer months [none of the ranchers indicated they would go out of business] (p. 171)

Comment - In reviewing the analysis in Chapter 3, the only potential adverse impact of the No Grazing Alternative appears to be the socioeconomic impact on agribusiness. However, Chapter 3 also describes the potential beneficial impacts on outdoor recreation from prohibiting grazing. Although the analysis is not clear, it appears the beneficial impacts on outdoor recreation may outweigh the adverse impacts on agribusiness in regard to the local and regional economies and in regard to the overall social use of the Forest, especially when considering the downward trend in grazing. (p. 5) If the beneficial socioeconomic impacts outweigh the adverse socioeconomic impacts, then Alternative No. 1 would not have any adverse impacts at all, making Alternative No. 1 an obvious choice for selection.

Q. Please provide an analysis of socioeconomic impacts that allows for a full understanding of the beneficial and adverse impacts of the alternatives.

Comment - The DEIS states,

The main criterion in assessing the financial efficiency is Present Net Value (PNV). ... Costs expressed in dollar terms here include labor and materials. Benefits expressed in dollar terms here include grazing fees... PNV is used as an indicator of financial efficiency... A *positive PNV* indicates that the alternative is financially efficient. [Italics added] (p. 175)

As shown by Table 3-10, none of the alternatives have a "positive PNV". As shown by Table 3-10, Alternative No. 1, No Grazing, is the only alternative that does not have a negative PNV, which makes Alternative No. 1 the most financially-efficient of all the alternatives.

Q. For each alternative, please provide the activities (other than administrative) and their costs that would be conducted by Forest Service to support grazing.

Q. For Alternative Nos 2, 3, and 4, please describe why the revenue generated stays the same while at the same time the amount of acres grazed is dramatically reduced. Similarly, please describe why the Forest Service costs for each Alternative increases while at the same time the amount of acres grazed decreases.

Comment -The economic analysis states,

*other benefits and costs* .... such as watershed and riparian health or scenic quality, have not been assigned dollar values; therefore, they are expressed using *other qualitative terms elsewhere in this EIS*.... It should be *reminded* that PNV is used as an indicator of financial efficiency and presents but one approach to be used in conjunction with many other non-monetized factors in the *decision-making process* **Management of National Forest lands is expected to yield positive net benefits for the American public, including the consideration of all benefits and costs.** (Italics and bold added) (p. 175)

We do not understand the purpose of ‘reminding’ reviewers of the economic analysis, that the Forest Service is required to consider the impacts on all resources before making a decision. This is the only resource analysis that includes such reminder. The Forest Service appears to say, ‘The financial efficiency of each alternative needs to be considered along with the impacts of the alternative on all resources’. Based on the PVN *and* the EIS’s analysis of “other non-monetized factors the decision [which] yields [the] positive net benefits for the American public, including the consideration of all benefits and costs [is Alternative No. 1]”.

Q. Please describe the purpose of reminding socioeconomic reviewers of the Forest Service’s responsibilities under NEPA and MUSYA to consider all resource impacts.

Comment - The scope of Purpose and Need is too restrictive.

The purpose of this action is to administer term livestock grazing *on all or portions of the Weminuche Landscape* ...there is a need to continue to provide the opportunity for permitted domestic livestock grazing. (Italics added) (p.12)

There is not a “need” to continue grazing in all or any part of the Weminuche Landscape. The Multiple Use and Sustained Yield Act, the Wilderness Act, the Forest and Rangeland Renewable Resources Planning Act, the Federal Land Policy and Management Act, the National Forest Management Act, or the Rescission Act do not require that grazing continue. Therefore, the need to continue to authorize grazing must not be preordained by the Purpose and Need. Instead, the decision to continue grazing in the Landscape must be based on this current analysis.

As stated by the Purpose and Need statement continuing grazing is important to American and the local community because grazing contributes,

to the economic and social well-being of people by providing opportunities for economic diversity and by promoting stability for communities that depend on rangeland resources for their livelihood. (*FSM 2202*)

Q. To allow for the consideration of a proper range of alternatives, please remove continued grazing from the Purpose and Need statement. A more appropriate purpose and need would be to “consider the future of livestock grazing” on these landscapes.

Comment - The DEIS’s socioeconomic analysis does not adequately describe the contribution of grazing benefits on “the economic and social well-being” as compared with all other impacts (beneficial and adverse) to determine if grazing should continue. As discussed in elsewhere in these comment, the current socioeconomic analysis in the DIES does not support this statement and there is no information in the DEIS supports the statement that this community depends on rangeland resources for their livelihood.

Q. Please include in the analysis of socioeconomic impacts *how* continuing grazing in the Weminuche Wilderness contributes to the economic and social well-being of the American people by “providing opportunities for economic diversity and by promoting stability for the local community”.

Q. Please provide the socioeconomic analysis that demonstrates the local community *depends* on grazing for their livelihood.

Q. Please provide the socioeconomic analysis that demonstrates the contributions from outdoor recreation and associated commercial guiding and outfitting services and compare these contributions with grazing.

Comment - The DEIS states,

The need for a change in [grazing] management is identified by comparing what is desired across the landscape (desired conditions) to what currently exists on the landscape in the analysis area (existing conditions). (p. 3)

The DEIS states wilderness needs are met by addressing the vegetative needs.

Because the desired conditions for wilderness are related primarily to vegetation conditions, the conclusions for existing wilderness conditions are generally the same as for vegetative existing conditions, *in that existing conditions are generally meeting desired conditions.* (Italics added) (p. 3)

The assumption that wilderness equals vegetation in regard to existing and desired conditions, is unsupported by the DEIS, and we believe it is incorrect. Wilderness and vegetative needs are not always the same and, as described in other parts of the DEIS, wilderness needs are not being met. As example the DEIS states,

Unfortunately, many of the same features/infrastructure that are used by recreational users are also necessary for domestic sheep grazing – thus creating user conflicts. In some cases, seeing the sheep grazing is a unique view for a visitor to the area and no conflict exists, but for more local or regular users, the sheep are seen as a negative.... The conflict for recreational users can be direct; the actions of sheep grazing (destruction of wildflowers, site/smell of manure, aggressive guard dogs, etc.) *directly affect a person's ability to complete their recreational activity.* Or the conflict can be one of social values, in that those recreating in the area have personal beliefs about sheep grazing on FS lands, even if they do not actually encounter sheep while recreating. (Italics added) (p. 168)

Grazing impacts wilderness in more ways than impacting vegetation because wilderness is more than just environmental resources. Wilderness is the ability to experience solitude in a primitive and natural environment. As stated by the *Wilderness Monitoring Manual, Weminuche and South San Juan Wilderness Areas* wilderness is about the ability to experience areas with “primeval character and influence, without permanent improvements or human habitation, which is protected and managed so as to preserve its natural conditions”. For the majority of wilderness users, grazing is an undesired and unacceptable part of the wilderness experience in the Weminuche Wilderness. The unnatural presence of livestock directly impacts the wilderness experience in ways not quantified by vegetative conditions.

While Wilderness, per se, is not a reason to eliminate livestock grazing, user conflicts, resource conflicts, etc. can be justification for no longer authorizing grazing.

Q . Please describe the needs of the wilderness experience based on a comparison of existing wilderness experience conditions with the desired conditions of the wilderness experience.

Comment - The No Action Alternative (p. 34) does not comply with the CEQ's Guidance (46 FR 18026, Question No.3) and Forest Service NEPA Policy (FSH 1909.15, Chapter 10). When the proposal is to modify an existing action, such as the current proposal to modify grazing, both

CEQ and the Forest Service require the No Action Alternative is “no change from current management direction or level of management intensity” or “no change from current management direction”. Therefore, the proper No Action Alternative for this project is the continuation of unmodified grazing. Unfortunately, the correct No Action Alternative (Continued Grazing) is described in the DEIS as an Action Alternative (Alternative No. 2).

Q. Please describe the correct No Action and Action Alternatives and their impacts.

Comment - The purpose of Table 2-7 is to compare the impacts of each alternative on seven resources. However, “impacts” are not described for water quality, vegetation, recreation, and cultural resources. Instead, the table identifies whether monitoring or design criteria would be implemented. These are not impacts. The fact that monitoring occurs or does not occur says nothing about the impact.

Q. In order to provide a true comparison, please describe “impacts” for each alternative on each resource in Table 2-7.

Comment - In Table 2-7, the entire 165,084 acres of the project are currently open to grazing (Alternative No. 2) However, Figure Nos. 1-7 and 1-8 show much of the project area is not suitable for grazing.

Q. Please describe areas that have been determined to be suitable for grazing versus areas that are open to grazing. What criteria does the Forest Service use to determine “suitability” for grazing?

Comment - Table 2-7, Alternative No. 2, Recreation states “Avoid Burnt Timber Trail” however, page 108 states Burnt Timber Trail would continue to be used under Alternative No. 2.

Q. Please clarify if Alternative No. 2 would avoid Burnt Timber Trail.

Comment – Chapter 3 describes the impacts on Rangeland Management, Fisheries, and Roadless Areas. However, these impacts are not included in Table 2-7.

Q. Please include in Table 2-7 all impacts discussed in Chapter 3.

Comment - Table 2-7 includes Natural Resources and ranks each alternative in regard to impacts. However, Natural Resources are undefined in the DEIS and the impacts on Natural Resources are not described in Chapter 3. In addition, Natural Resources are not identified as a “key issue” on page 20.

Q. Please identify and describe the specific resources that are included in Natural Resources and describe the impacts of the alternatives on Natural Resources in Chapter 3.

Q. Please indicate if Table 2-7, Vegetation Alternative No. 4 should also include the "7 vacant" allotments shown for Alternative No. 2.

Comment – The DEIS speaks to invasives, requiring weed free feed, etc. However, you do not identify any requirement that seed used on the allotments consist only of native species.

Q. What is the Forest Service requirement regarding when seed might be used and what kind of seed would be required?

Comment – The DEIS does not distinguish between native and non-native graminoids in your analysis. Non-natives such as Kentucky Bluegrass, crested wheatgrass, smooth brome, etc. are not appropriate desired species within wilderness or areas of pristine forest lands.

Q. Please identify which vegetative components of the project area are native and which are non-native.

Comment – The re-allocation of grazing privileges on forest lands where allotments are currently vacant livestock grazing has not occurred for decades, there is not demand as it is not economically viable and there are potential conflicts with bighorn sheep or recreation is inconsistent. Per the stated guidelines the vacant allotments must be closed as these grazing privileges are not to be re-allocated. They should not be left “vacant” or be considered in the future for “restocking”.

### **Guidelines**

- If grazing privileges are relinquished or cancelled on lands where...conflicts with other resources make livestock grazing undesirable, the privileges should not be re-allocated. 2.7.16

Q. Please explain why these guidelines are not being applied in the DEIS?

Comment – Given the many concerns and impacts outlined for each allotment in the table on page 54 such as:

Cave Basin - Concerns with impacts to many wetlands and fens from any grazing.

Pine River - High recreation usage corridor. No request to use allotment in 30 years.

Minimal access to allotment.

And many more could be listed...

Q. Please explain why these concerns, lack of interest for livestock use, conflicts with other forest users, minimal access, etc. are not sufficient to justify closing the allotments to livestock grazing.

Comment – While livestock grazing is a legitimate multiple use of forest lands, there is an equally compelling multiple use need to protect substantial acreages of forest resources from livestock grazing and provide other opportunities such as recreation in landscapes without grazing use.

Q. Please describe what percentage of the entire San Juan National Forest is available and allotted for domestic livestock grazing.

Comment – One of the desired conditions defined by the Responsible Official for this analysis is:

At the landscape scale:

**Bighorn Sheep:** Reduce or eliminate overlap between active domestic sheep allotments and CPW mapped bighorn sheep summer ranges, also called Core Herd Home Range (CHHR). Prevent physical contact between bighorn sheep and domestic sheep. Manage domestic sheep to achieve effective separation from bighorn sheep.

In spite of the above, the DEIS includes alternatives that would allow for sheep grazing to occur

in high risk allotments. No domestic sheep grazing should occur in high risk allotments. Instead of hazing bighorn sheep the forest should prevent the chance of interaction entirely and provide for bighorn sheep range to expand without the chance of interaction with domestic sheep.

Q. Explain why the limited economic benefit to a few permittees overrides the economic benefit of a healthy and rare bighorn sheep population desired by many Americans.

Comment - One of the desired conditions defined by the Responsible Official for this analysis is:

**Allowable Use:** Utilization guidelines are met across the analysis area. Allowable forage utilization should not exceed 45-50%.

This level of utilization, while identified in the Forest Plan, exceeds that recommended to ensure sustainable healthy ecological conditions and forage. Given this is a complete EIS addressing livestock grazing within designated Wilderness, the Forest should be using the strictest scientifically justifiable utilization level possible for future grazing authorizations. When higher utilization levels are set and then exceeded, the result is utilization that can rise to 90% or higher. If a lower level such as 30-35% utilization is established the resource is maintained at a healthy and natural and sustainable condition even if occasional over-utilization occurs.

Q. Please describe why the Forest grazing utilization standard is so high.