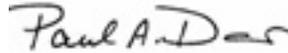


Comments on

**Weminuche Landscape Grazing Analysis
Draft Environmental Impact Statement
Hinsdale, La Plata, and San Juan Counties, Colorado
USDA Forest Service
San Juan National Forest, Columbine Ranger District**

Comments by:

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The choice of Alternative 3 related to the Draft Weminuche Landscape Grazing Analysis EIS is arbitrary, capricious, and lacking in scientific basis.

1) The Choice of Alternative 3 is **Arbitrary and Capricious** in that NO Explicit Discussion Weighing the Attributes of each Alternative is presented. That is, the basis for choosing Alternative 3 is missing from the document.

Detailed evaluations are provided about each alternative but the basis for choosing Alternative 3 is missing from this document. The closest the document gets is Chapter 2.5 and Table 2.7. However this Chapter concludes without a choice, and more importantly, basis for choosing Alternative 3 over the other alternatives. In fact if one only read Chapter 2.5 and Table 2.7, one would conclude that Alternative 1 must be the choice as it is clearly the best. But why Alternative 3 gets chosen over Alternative 1 is missing.

2) The Apparent Reason for Choosing Alternative 3 is **Arbitrary and Capricious**

The only statement that directly compares the attributes of the different alternatives is:

“Alternative 1 would be of greatest benefit to natural resources, but would have negative socio-economic impacts”.

This statement leads one to the conclusion that the only reason that Alternative 3 was

chosen over Alternative 1 is ‘*negative socio-economic impacts.*’ The draft EIS also states: ”Major conclusions are that, while the landscape is generally in good condition, ***most natural resources including water quality, vegetation and soils, recreation, wildlife, and cultural resources, would benefit most from Alternative 1***, then Alternative 4, next Alternative 3. Alternative 2 would be the least desirable.”

Therefore it is clear that the Draft EIS is **arbitrary and capricious** in weighting socio-economic impacts as more important than water quality, vegetation and soils, recreation, wildlife, and cultural resources.

3) The Draft EIS is **arbitrary** in its presentation of information in support of the proposed alternative.

The draft implies that grazing is required by the Wilderness Act and by the Multiple Use Mandate. Neither the act nor this Mandate actually requires grazing. They allow, and maybe even encourage grazing but they do not require grazing. If they did Alternative 1 would not even be allowed into the NEPA process as only viable alternatives are to be presented. In addition, the Wilderness Act clearly allows for the removal of livestock by stating:

*Any adjustments in the numbers of livestock permitted to graze in wilderness areas should be made as a result of revisions in the normal grazing and land management planning and policy setting process, giving consideration to legal mandates, **range condition, and the protection of the range resource from deterioration...***

Also, the USFS knows there are wilderness areas that do not allow any livestock grazing. (See the Sandia Wilderness Area for example).

4) The **Draft EIS is arbitrary and lacking scientific basis in stating that Alternative 1 would have negative socio-economic impacts when the Social and Economic Specialist Report says the opposite.**

The Social and Economic Specialist Report states that Alternatives 2, 3, and 4 have negative economic consequences – the cost of administering the grazing permits outweighs the cumulative grazing fees. This report also states there is no loss of our tax dollars if grazing is eliminated (Alternative 1). Further, the specialist report states: “Based on the information presented above, implementation of any alternative analyzed in this EIS would not result in substantial cumulative impacts to economic resources.”

However the Draft EIS falsely states that Alternative 1 has negative socio-economic impacts.

5) **The Draft EIS is arbitrary and lacking scientific basis by presenting the socio-economics impacts analysis almost completely from the ranchers point of view.**

The cumulative impacts section of the Social and Economic Specialist Report belies a serious and systemic bias with that analysis and the Draft EIS in general. Everything is presented in terms of a few ranchers and all other users are excluded.

In addition to the blatant bias of the report, the Social and Economic Specialist Report ignores the probable increase in recreation and recreational value associated with eliminating grazing - never quantifying or presenting it.

The analysis also fails to address the unfair advantage that ranchers using public lands have over ranchers who have to pay unsubsidized grazing rates.

5) The Draft EIS is **arbitrary and lacking scientific basis** by viewing Natural and Large-Scale Effects from the point of view of “Impacts for Grazing” instead of Impacts Caused by Grazing.

The United Nations has demonstrated that “livestock grazing” contributes more greenhouse gases than transportation (<http://www.un.org/apps/news/story.asp?newsID=20772#.VwEK7KvsatY>). And while the United States taxpayer is financing millions if not billions of dollars in efforts to reduce green house gases ignores this critical environmental impact instead worrying about how climate change may hurt the grazing industry. So while the rest of the country is trying to solve the problem of climate change, this Draft EIS chooses an alternative which continues the problem.

Fire is addressed in much the same way – addressing the effects of fire on grazing while ignoring the effects of grazing on fire. Much research has shown that grazing increases the chances for catastrophic fire and that research has been ignored (see for just one example: Effects of Livestock Grazing on Pre-Settlement Fire Regimes in New Mexico by Ramzi Touchan, Thomas W. Swetnam, and Henri D. Grissino-Mayer in the USDA’s 1995 Proceedings: Symposium on Fire in Wilderness and Park Management).