May 1, 2015

Mr. Richard Mayberry
Division of Forest, Rangeland, Riparian and Plant Conservation
Bureau of Land Management
Department of the Interior
Washington, DC

Re: Changes in BLM Handbook 4110-1 -- Qualifications and Preference

Mr. Mayberry:

We write today to urge the BLM to remove suspended AUMs from BLM term grazing permits and leases administered by the BLM. Permits should only authorize AUM numbers that are consistent with agency stewardship requirements described in rangeland health standards. AUM numbers must never be authorized that could threaten the viability of native ecosystems on our publicly-owned federal lands. The Sierra Club believes that a complete and mandatory elimination of suspended AUMs from permits would promote the long-term viability of native flora and fauna on BLM-administered lands.

**Carrying Capacity**

Any increase in livestock grazing on public lands undermines the ability of BLM to ensure that native habitats and wildlife are able to absorb the adverse impacts of livestock grazing without placing ecological components, structure, or function at risk.

Activation of suspended AUMs amounts to expanding an extractive use that frequently erodes the broadly-conceived carrying capacity of native ecosystems on our federal lands. Given the alarming decline in native biodiversity both globally and locally, any activation of suspended AUMs is inappropriate by any reasonable definition, and it deeply conflicts with the Sierra Club’s Public Lands Grazing policy that deems livestock grazing on federal public lands as largely inappropriate even under the best of climatic circumstances.

**NEPA and Carrying Capacity:**

One of the most important requirements of NEPA is that agencies accurately and fully describe the decision being proposed and then assess the likely impacts of that decision after authorization. Failure to accurately describe and analyze the likely impacts from the proposed decision violates federal law.

BLM environmental analyses have often been based upon allotment-level livestock impacts associated with levels of grazing well below permitted numbers. Consequently, BLM environmental analyses for grazing permit renewals have frequently failed to analyze the likely impacts associated with grazing at
maximum-allowable permitted AUMs. For allotments with suspended AUMs, the problems associated with BLM permit renewal analyses increase further. Because suspended AUM numbers may be activated, BLM has been required by NEPA to assess the impacts of grazing at the permitted numbers plus the suspended numbers of AUMs. Currently, BLM does not conduct NEPA analysis for suspended numbers.

Fortunately, independent case studies of BLM allotments have been conducted that indicate activation of currently permitted numbers would likely lead to substantial non-compliance with BLM rangeland health standards.

These studies suggest that the BLM has often issued permits with allowable AUM numbers in violation of NEPA. If the BLM is to conduct its range management program in compliance with applicable federal laws in the future, BLM will likely have to institute reductions in active and suspended AUMs.

**Permits, AUMs, and Property**

Public lands ranchers, lenders, and the IRS have long treated grazing permits and associated AUMs (including suspended AUMs) as though permits and AUMs are real property. Federal land management agencies such as the BLM have been complicit in this treatment by tacitly or explicitly accepting such arrangements in practice.

Because of this past BLM pattern, public ranchers have frequently pressured federal land managers to retain large numbers of suspended AUMs on term grazing permits. BLM has usually acceded to the wishes of these public lands ranchers, thus contributing to the artificial inflation of private base property values associated with term grazing permits.

This past BLM practice now generates significant economic, political, and environmental instability, as the BLM has unwisely encouraged public lands ranchers to secure outstanding loans premised upon unrealistic, combined numbers of active and suspended AUMs. Moreover, this instability is likely to increase in the future, as long-term drought threatens to ravage western, federally-owned BLM rangelands. Associated reductions in the carrying capacity of the land and agency reductions in all categories of AUMs to ensure compliance with rangeland health standards are features of the future that will likely confront the rural economies of the western U.S.

It is for this reason that elimination of suspended AUMs should occur **now**. Economic damage to public lands ranchers and ecological damage to BLM lands can best be minimized in the future by eliminating suspended AUMs from permits **now** before their interaction with other factors metastasizes into a cancer that threatens the destruction of rural economies and functioning ecosystems on BLM lands alike.

**Conclusion**

In short, the Sierra Club strongly believes that the BLM needs to revise and update Grazing Handbook Section 4110-1 in such a manner that a mandatory elimination of suspended AUMs from BLM term grazing permits and leases is effected.

Only through such an action can the adverse impacts associated with suspended AUMs discussed above be reduced and eliminated over both the short and long term. Moreover, such action will promote the restoration of a fundamental function of the BLM: to ensure responsible, environmentally-protective rangeland management **based on open and honest information**.
Sincerely,

Athan Manuel            Brian Ertz
Director, Lands Protection Program  Chair, Sierra Club Grazing Team

CC: Ms. Terri Johnson, Director Neil Kornze, Chief of Staff Tommy Beaudreau