



U.S. DEPARTMENT OF THE INTERIOR
**BUREAU OF LAND
MANAGEMENT**

April 2020

Revision of the BLM's Grazing Regulation 43 CFR Part 4100—Scoping Report



TABLE OF CONTENTS

Chapter Page

CHAPTER 1. INTRODUCTION.....	1-1
1.1 Background.....	1-1
1.2 Purpose and Need for the EIS.....	1-2
1.3 Overview of the Scoping Process and Scoping Report.....	1-2
1.4 Description of the Scoping Process	1-2
1.4.1 Scoping.....	1-2
1.4.2 Native Consultation.....	1-5
1.4.3 Cooperating Agency Scoping Meeting.....	1-5
1.4.4 Public Scoping Meetings	1-5
1.5 Method of Comment Collection and Analysis	1-6
CHAPTER 2. COMMENT SUMMARY	2-1
2.1 Summary of Public Comments Received	2-1
2.1.1 Commenters by Affiliation	2-1
2.1.2 Number of Comments by Issue Category	2-1
CHAPTER 3. ISSUE STATEMENTS AND COMMENT SUMMARIES.....	3-1
3.1.1 NEPA—Public Outreach.....	3-1
3.1.2 NEPA—Range of Alternatives.....	3-1
3.1.3 NEPA—Best Available Science and Baseline Data.....	3-2
3.1.4 NEPA—GIS Data and Analysis.....	3-2
3.1.5 NEPA—Direct/Indirect Impacts.....	3-2
3.1.6 NEPA—Cumulative Impacts	3-2
3.2 Regulatory Changes Part 4100—Grazing Administration, Exclusive of Alaska.....	3-3
3.2.1 Subpart 4100—Grazing Administration, Exclusive of Alaska; General.....	3-3
3.2.2 Subpart 4110—Qualifications and Preference.....	3-3
3.2.3 Subpart 4120—Grazing Management.....	3-6
3.2.4 Subpart 4130—Authorizing Grazing Use	3-8
3.2.5 Subpart 4140—Prohibited Acts	3-9
3.2.6 Subpart 4150—Unauthorized Grazing.....	3-9
3.2.7 Subpart 4160—Administrative Remedies.....	3-10
3.2.8 Subpart 4170—Penalties.....	3-10
3.2.9 Subpart 4180—Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration.....	3-10
3.2.10 Subpart 4190—Fuels and Fire Management.....	3-12
3.3 Permitting and Leasing Process	3-12
3.4 General Changes to Regulations.....	3-14
3.5 Comments Made Regarding the 2006 Regulations.....	3-18
3.6 Taylor Grazing Act.....	3-18
3.7 Federal Land Policy and Management Act.....	3-18
3.8 Other Laws	3-19
3.9 Consistency with Federal/State/Local Plans	3-19
3.10 Special Designations.....	3-19
3.11 Wild and Scenic Rivers.....	3-20
3.12 Wilderness Areas	3-20
3.13 Wilderness Study Areas.....	3-20

3.14	Lands With Wilderness Characteristics	3-20
3.15	Climate and Meteorology	3-20
3.16	Soil Resources	3-21
3.17	Water Resources.....	3-21
3.18	Wetlands and Floodplains.....	3-21
3.19	Vegetation.....	3-22
3.20	Biological Resources	3-22
3.21	Fish and Wildlife.....	3-23
3.22	Special Status Species.....	3-23
3.23	Wild Horses and Burros.....	3-23
3.24	Renewable Energy	3-24
3.25	Petroleum Resources	3-24
3.26	Fuels and Fire Management.....	3-24
3.27	Cultural Resources.....	3-25
3.28	Tribal Interests	3-25
3.29	Environmental Justice.....	3-25
3.30	Transportation	3-26
3.31	Economy	3-26
3.32	Livestock Grazing	3-26
3.33	Landownership and Use.....	3-26
3.34	Social Systems.....	3-27
3.35	Recreation	3-27
3.36	Public Health and Safety.....	3-27
CHAPTER 4.	FUTURE STEPS	4-1
4.1	Future Steps and Public Participation Opportunities.....	4-1
4.2	Contact Information	4-1
CHAPTER 5.	REFERENCES.....	5-1

TABLE	Page
I-1 Public Scoping Meetings	I-6

FIGURES	Page
I-1 BLM Livestock Grazing Allotments	I-3
2-1 Number of Comment Submissions by State.....	2-2
2-2 Issue Categories.....	2-3

APPENDICES

A	Notice of Intent
B	Public Scoping Meeting Summaries
C	Substantive Comments Organized by Process and Resource Categories

ACRONYMS AND ABBREVIATIONS

Full Phrase

AO	authorized officer
AUMs	animal unit month
BLM	Bureau of Land Management
CFR	Code of Federal Regulations
EA	environmental assessment
EIS	environmental impact statement
EO	executive order
FLPMA	Federal Land Policy and Management Act of 1976
FOIA	Freedom of Information Act
NEPA	National Environmental Policy Act of 1969
RAC	Resource Advisory Committee
RMP	resource management plan
ROD	record of decision
TNR	temporary nonrenewable

This page intentionally left blank.

Chapter I. Introduction

I.1 BACKGROUND

The United States Department of the Interior, Bureau of Land Management (BLM) is preparing an environmental impact statement (EIS) in accordance with the National Environmental Policy Act of 1969 (NEPA), as amended. Its purpose is to evaluate an amendment to the grazing regulation for public lands, 43 Code of Federal Regulations (CFR) Part 4100, Grazing Administration Exclusive of Alaska.

The BLM grazing regulations found at 43 CFR 4100 govern all public lands, excluding Alaska, that have been identified as suitable for livestock grazing. These lands presently include approximately 160 million acres in the western United States (**Figure I-1**, BLM Livestock Grazing Allotments). The regulations were promulgated in accordance with the Taylor Grazing Act of 1934, as amended (43 US Code 315, 315a–315r), the Federal Land Policy and Management Act of 1976 (FLPMA), and the Public Rangelands Improvement Act of 1978.

Since the first set of grazing regulations was issued after passage of the Taylor Grazing Act, the regulations have been periodically modified, revised, and updated. The last major revision culminated when the BLM published and implemented comprehensive changes to the grazing regulations in 1995 (current grazing rule). The most recent decision affecting the BLM’s grazing administration regulations occurred in 2006, and changes to 43 CFR 4100 were published in the *Federal Register* on July 12, 2006 (2006 grazing rule).

In 2007, the US District Court in Idaho permanently enjoined (prohibited) implementation of the 2006 grazing rule and regulatory changes in all respects. The Ninth Circuit Court of Appeals agreed with the Idaho District Court and affirmed the permanent injunction enjoining the 2006 grazing rule. Since then the BLM has managed public land livestock grazing activities in conformance with the 1995-era regulations that were in effect before the 2006 rule was adopted (October 1, 2005, edition of 43 CFR 4100,) except for the conservation use permit provision.

The corrected regulations have never been published in the CFR. The BLM is conducting this EIS in order to document the environmental effects of proposed alternatives for revisions to the grazing regulations at 43 CFR 4100.

As part of the proposed changes to the current grazing rule, the BLM may consider revising some provisions contained in 43 CFR 4100. The proposed grazing rule change would address these revisions to the other regulations as part of a single rulemaking effort. The EIS will cover the environmental effects of the proposed changes.

The BLM initiated the rulemaking process by obtaining a Regulation Identification Number 1004-AE63 on May 8, 2019. As a part of this process, a Notice of Proposed Rulemaking must be published in the *Federal Register*. The notice must include the applicable NEPA compliance document, the economic impact analysis, the compliance statements (in accordance with Executive Orders [EOs] 12866 and 13563), and supplementary information described in the Department of the Interior’s Handbook 318 DM titled, “How to Prepare Regulations and Federal Register Notices” (September 2013).

I.2 PURPOSE AND NEED FOR THE EIS

The overall purpose of the EIS is to undertake rulemaking procedures, including NEPA compliance, to address proposed revisions to the BLM's grazing administration regulations promulgated under 43 CFR 4100, Exclusive of Alaska. The BLM is developing an EIS to address the federal action of revising its regulations in accordance with the requirements of section 102(2)(C) of NEPA.

I.3 OVERVIEW OF THE SCOPING PROCESS AND SCOPING REPORT

Public involvement is a vital and legally required component of the rulemaking process. It vests the public in the decision-making process and allows for full environmental disclosure. Guidance for implementing public involvement under NEPA is codified in 40 CFR 1506.6.

Scoping is an open and early step in the NEPA process that helps the BLM determine the scope of issues to be addressed and to identify significant issues related to the proposed program. Information collected during scoping may also be used to develop the alternatives to be analyzed in a NEPA document.

In accordance with the BLM NEPA Handbook, Section 9.1.3 (BLM 2008), the BLM must document the public scoping results. This scoping report summarizes the scoping process and the comments received during the formal scoping period. Such comments were submitted during tribal coordination, government-to-government consultation, internal scoping meetings, and public scoping meetings.

I.4 DESCRIPTION OF THE SCOPING PROCESS

As NEPA and its public involvement guidance require, the BLM solicited comments from relevant agencies and the public, then organized and analyzed all comments that it received. The agency then evaluated the position statement of each comment and extracted the overarching issues that it would address during the rulemaking process. These issues define the scope of analysis for developing the EIS; the BLM uses them to develop the project alternatives.

I.4.1 Scoping

As defined under NEPA, the scoping period began with the publication of the Notice of Intent in the *Federal Register* on January 21, 2020, titled Notice of Intent To Prepare an Environmental Impact Statement for the Proposed Revision of Grazing Regulations for Public Lands (see **Appendix A**). During the scoping period, the BLM sought public comments to determine relevant issues that could influence the scope of the environmental analysis, including alternatives, and to guide the process for developing the EIS.

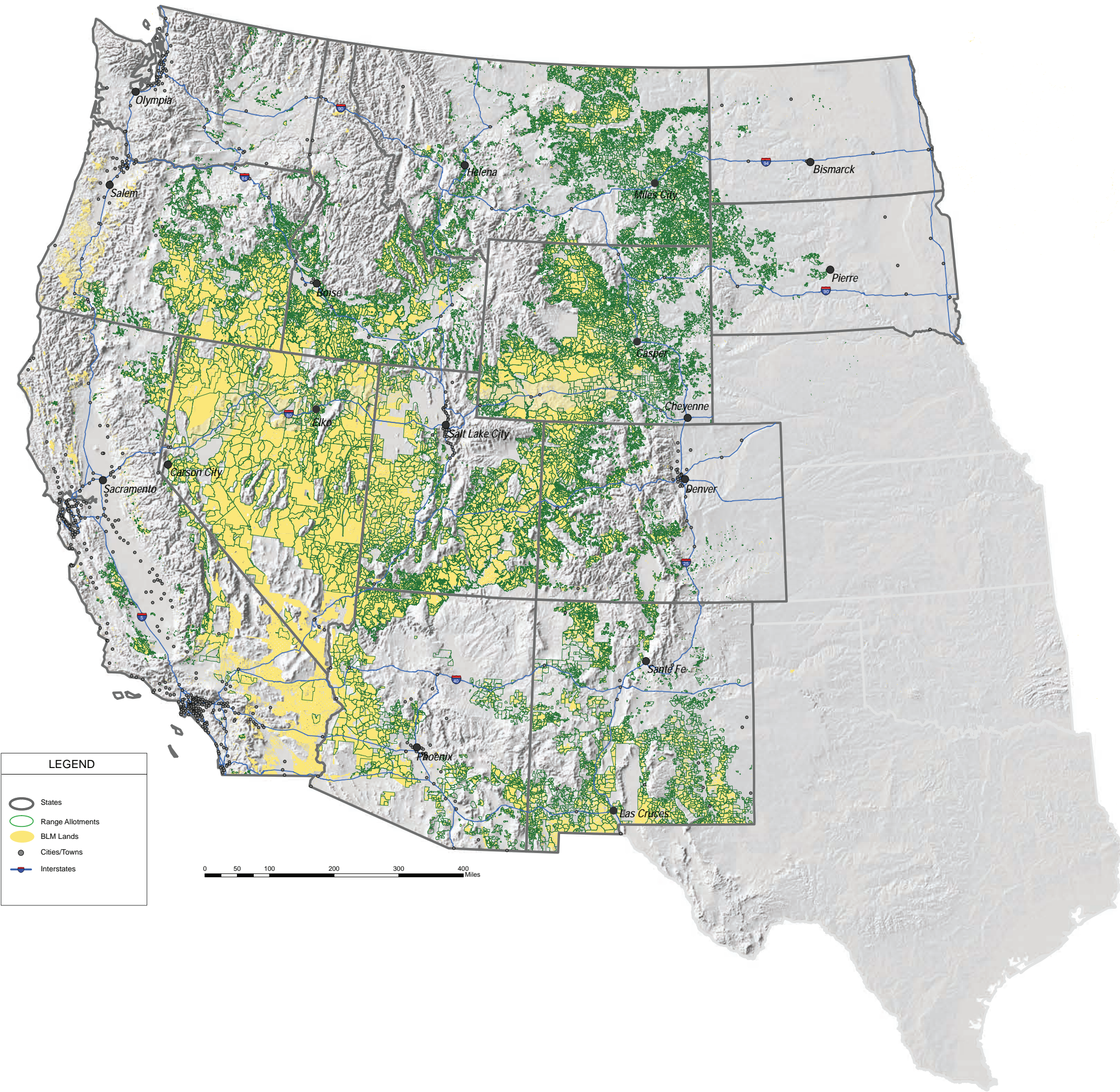
The official comment period ended on March 6, 2020. This document summarizes and presents comments received or postmarked by this date. To the extent practicable, the BLM will consider comments received past this date during the development of the EIS, but late comments were not summarized in this report. The BLM will continue to review and consider comments regarding requests for new data while preparing the EIS.

The BLM used several additional methods of outreach to notify the public of the project and the scheduled public meetings. Public meeting schedules were posted in several newspaper publications, in areas where meetings were held (see **Appendix B**). Additionally, the BLM maintains a project website with information related to the development of the project: <https://go.usa.gov/xyMqb>. The website includes background documents, maps, information on public meetings, and contact information.



BLM Grazing Allotment Map

Department of the Interior | Bureau of Land Management
August 2019



This page intentionally left blank.

I.4.2 Tribal Consultation

The BLM, as the lead federal agency, coordinates directly with federally recognized tribal governments during preparation of the EIS. This is done in compliance with Executive Order 13175, Consultation and Coordination with Indian Tribal Governments.

There are several avenues of participation open to tribes: through the public process, as stakeholders, as cooperating agencies with special expertise, and through the government-to-government relationship. This section is a description of activities under the government-to-government relationship between federal agencies and federally recognized tribes, which is recognized as a special relationship, based on tribal sovereignty.

Consistent with its policies concerning consultation with tribes, the BLM sent a letter, concerning this and two other rulemaking efforts, in December 2019 to all tribes, offering the opportunity to participate in formal government-to-government consultation, to participate as a cooperating agency, or to simply receive information about the project.

To date, the BLM has held consultation meetings with the Te-Moak Tribe of Western Shoshone Indians of Nevada and Agua Caliente in California. Discussions with potentially affected tribes will occur throughout the EIS process.

I.4.3 Cooperating Agency Scoping Meeting

Cooperating agencies are those government agencies, including tribes, that have jurisdiction by law or special expertise. The BLM is in the process of determining the proper process under which to engage cooperating agencies.

I.4.4 Public Scoping Meetings

The BLM held four public scoping meetings in communities across the western United States (see **Table I-1**). All the meetings were open house style, where attendees could view informational posters, maps, and other materials. Representatives from the BLM were available to answer questions. They provided two avenues for attendees to submit comments during the meetings. First, participants were provided access to computers where they could submit their digital comments through the ePlanning portal used throughout the scoping process. Second, they could write their comments on cards provided by the BLM and drop them in the comment box at the meeting.¹ **Appendix B** includes a summary of each of the public meetings. Materials provided to the public during these scoping meetings are available on the website (<https://go.usa.gov/xyMqb>).

The scoping meetings were attended by 905 people,² 54 of whom offered written comments: 40 individuals, 12 organizations (including businesses, citizens groups, and nonprofits), and 2 government representatives. The BLM incorporated comments provided during these meetings into the issue statements and comment summaries in **Chapter 3**.

¹ Attendees were also encouraged to take the comment cards with them, to be mailed to the BLM at a later date. The BLM also informed them of the option for submitting comments through the ePlanning page at any point during the comment period.

² This total includes attendees who signed in at a public scoping meeting. It is possible that attendees were present at meetings who did not officially sign in.

Table I-1
Public Scoping Meetings

Location	Date	Venue
Miles City, Montana	February 6, 2020	Sleep Inn and Suites 1006 S. Haynes Avenue, Miles City, Montana 59301
Las Cruces, New Mexico	February 11, 2020	Ramada Palms Hotel, 201 East University Avenue, Las Cruces, New Mexico 88005
Elko, Nevada	February 18, 2020	Elko Convention Center, 700 Moren Way, Elko, Nevada 89801
Casper, Wyoming	February 20, 2020	Casper Event Center, 1 Events Drive, Casper, Wyoming 82601

I.5 METHOD OF COMMENT COLLECTION AND ANALYSIS

All written submissions received on or before March 6, 2020, were evaluated and are considered in this scoping summary report. The report provides an overall summary of the types of comments related to each issue.

The BLM received 8,308 written submissions during the public scoping period, a large majority of which were form letters. Overall, it identified 3,775 substantive comments, using the Comment Analysis Response Application, the BLM's ePlanning software.

To ensure that public comments were properly registered and that none were overlooked, the BLM used a multiphase management and tracking system. Written submissions were given a unique identifier and were logged into the BLM's comment response and analysis database. BLM staff then reviewed each submission and extracted individual substantive comments. They reviewed each comment to determine if it pertained to an issue that would be resolved through the EIS. They assigned Each comment to one of two categories: substantive comments related specifically to the rulemaking or comments that are non-substantive or that pertain to issues beyond the scope of the rulemaking.

The BLM further classified all comments in the first category by commenter affiliation and issue category, as described in **Chapter 2**. Next, staff entered comments into the tracking database for analysis. Comments in the first category are summarized in **Chapter 2** of this report.

Chapter 2. Comment Summary

2.1 SUMMARY OF PUBLIC COMMENTS RECEIVED

2.1.1 Commenters by Affiliation

The BLM categorized all submissions received by commenters and tracked their contact information. **Figure 2-1**, below, shows the number of comment submissions by each state.³

In addition to unique submissions, nonprofit organizations and individuals submitted form letters and petition signatures. The BLM treated letters that represented slight variations of the form letter, but without additional substantive comments, as form letters. Form letter submissions containing additional substantive comments were categorized as unique submissions. In total, the BLM received 7,167 form letter submissions. (Note that by analyzing identical submissions as a group it did not reduce the importance of the comments.) NEPA regulations are clear that the public involvement process is not a vote but an opportunity to “determine the scope and the significant issues to be analyzed in depth in the environmental impact statement” (40 CFR 1501.7(a)(2)), as well as to “identify and eliminate from detailed study the issues which are not significant, or which have been covered by prior environmental review” (40 CFR 1501.7(a)(3)).

2.1.2 Number of Comments by Issue Category

Figure 2-2 shows the number and proportion of comments received by issue category. The BLM categorized the 3,775 substantive comments into 49 issue categories. **Chapter 3** provides a detailed analysis of the comments received for each issue category.

³ This figure includes totals for each state where a comment letter was submitted from. Some submissions, such as emails, did not include full address information and therefore are not included in this figure.

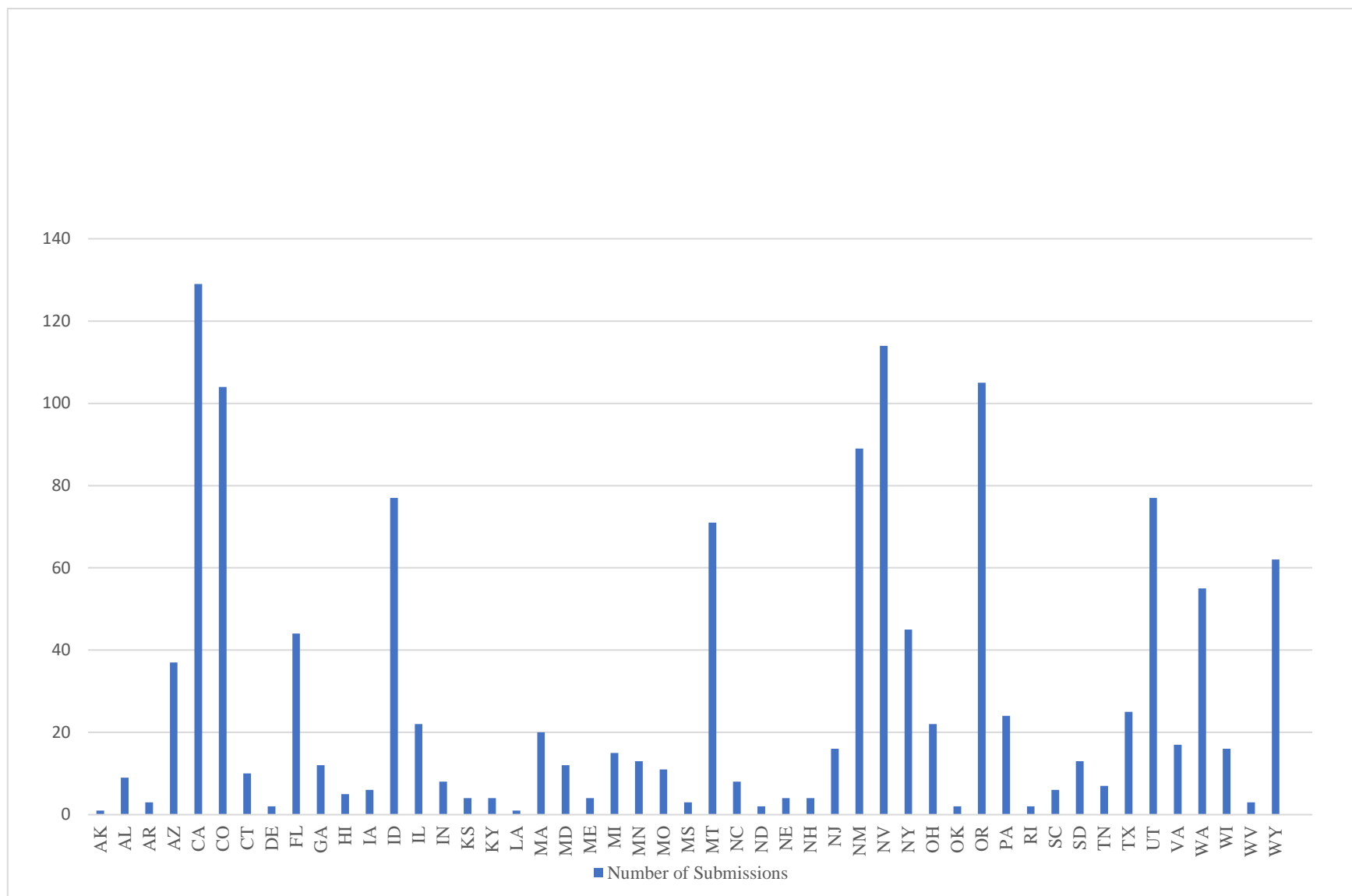
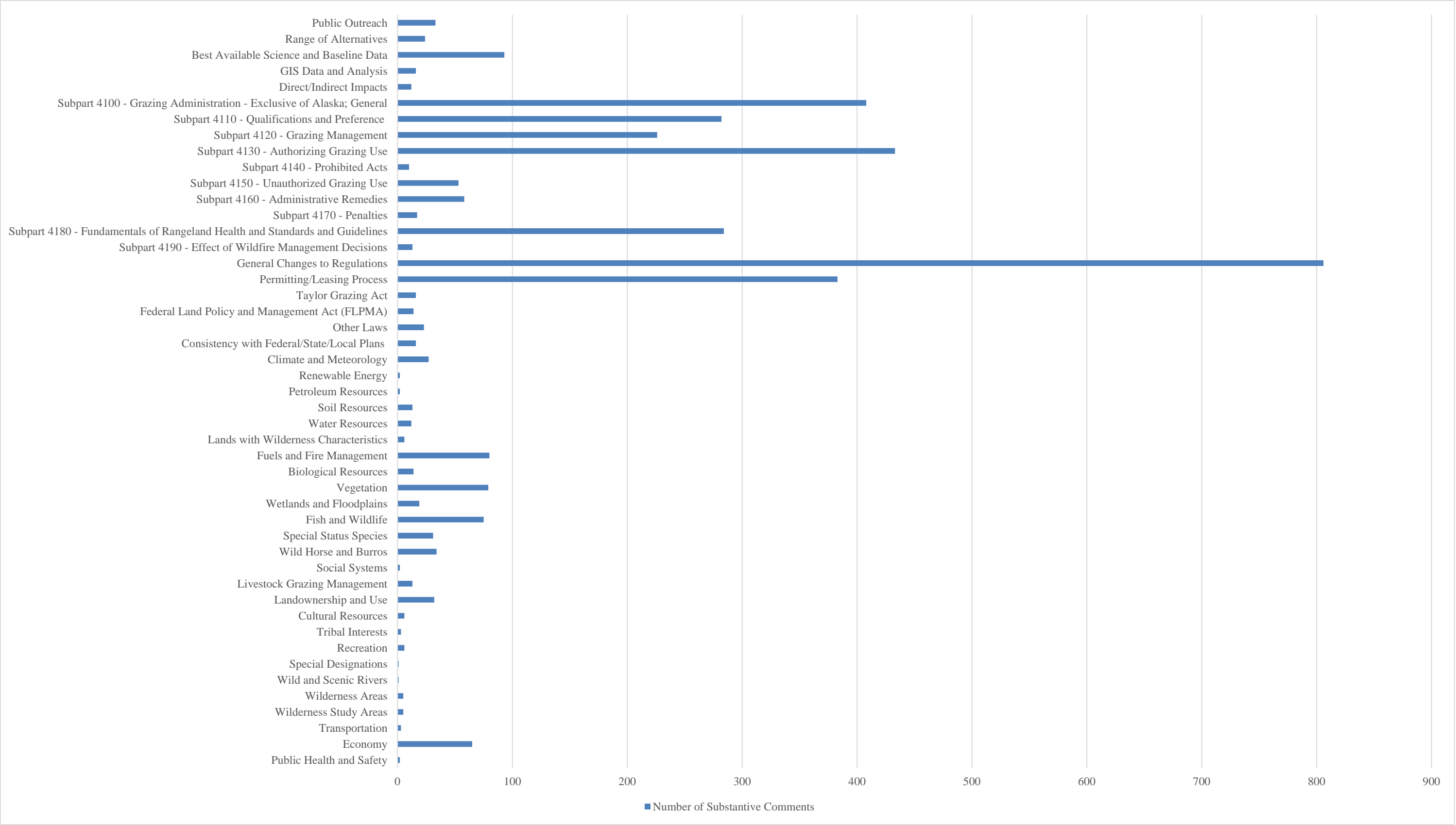
Figure 2-1. Number of Comment Submissions by State

Figure 2-2. Issue Categories



This page intentionally left blank.

Chapter 3. Issue Statements and Comment Summaries

For the purposes of BLM NEPA analysis, an issue is a point of disagreement, debate, or dispute with a proposed program, based on an anticipated environmental effect. An issue is more than just a position statement, such as disagreement with development on public lands. The BLM will use the issues and other information collected during scoping to help formulate a reasonable range of alternatives that it will analyze during the EIS process.

The issue statements presented below are preliminary and are based on the best information known to date. The BLM has developed a summary of the comments received that apply to each issue; for the full context of comments, see submissions posted on the project website: <https://go.usa.gov/xyMqb>.

The process of developing this EIS will afford opportunities for collaboration with local, state, federal, and tribal governments, land management agencies, public interest groups, and public land users. As a result of ongoing collaboration, the issues and concerns may be updated and supplemented to accurately reflect public comments and concerns.

3.1.1 NEPA—Public Outreach

- There is concern over having restrictions on comment period timelines and opportunities to provide comments during this NEPA process. The BLM should extend the scoping period, hold more public meetings in additional locations to give stakeholders and the public more time to provide comments, and maintain robust public participation and collaboration throughout this NEPA process.

3.1.2 NEPA—Range of Alternatives

- The BLM should include a conservation alternative in the draft EIS, comprised of the following elements:
 - 30 percent utilization rates
 - Allow non-use annually for up to 10 years
 - Review allotment health conditions at least every 10 years
 - Prohibit planting or seeding of nonnative species, except in rare cases
 - Report outcomes to the public
 - Use quantitative thresholds for monitoring
 - Use only nonlethal predator control
 - Use passive restoration
 - Not allow permittees to use allotments temporarily for unapproved uses
- The BLM should include the following range of alternatives for analysis:
 - A no action alternative that would consider re-adopting the grazing regulations promulgated in 2006 during the Bush Administration

- An alternative that would consider re-adopting the grazing regulations promulgated in 1996 during the Clinton Administration
- An alternative that would implement the 1996 Babbitt Rules, as affirmed by the US Supreme Court in *Public Lands Council v. Babbitt*, 529 US 728, 120 S.Ct. 1815, 146 L.Ed. 2d 753 (2000) (hereafter referred to as the 1996 Babbitt Rules)⁴
- An alternative that would implement the 1996 Babbitt Rules, but (a), as to be amended by the new provisions adopted in the FLPMA on December 19, 2019, 128 Stat. 376264, Public Law 113291, Section 3023 (12/19/2014); and (b), as to be amended by proposed amendments identified, with the removal of Subpart 4180
- An alternative that would implement the 1996 Babbitt Rules, but (a) as to be amended by the new provisions adopted in the FLPMA on December 19, 2019, 128 Stat. 376264, Public Law 113291, Section 3023 (12/19/2014); and (b), as to be amended by proposed amendments, including changes to, but not removal of, Subpart 4180

3.1.3 NEPA—Best Available Science and Baseline Data

- The BLM received 93 substantive comments regarding best available science and baseline data for it to consider while preparing the draft EIS. These included peer-reviewed articles, references, and requests for new studies. The BLM will review the full text citations outlined in these comments and will consider information presented when determining if modifications to the current regulations are necessary (see comments identified as Best Available Science and Baseline Data in **Appendix C**).

3.1.4 NEPA—GIS Data and Analysis

- How can the public obtain the data that the BLM will use to prepare maps for the draft EIS, such as data displaying grazing allotment boundaries on BLM-administered lands?
- The BLM should include in the draft EIS a list of the data layers and models used to analyze vegetation, climate change, and other resource conditions on rangelands.

3.1.5 NEPA—Direct/Indirect Impacts

- The BLM should include alternative ways to avoid, minimize, and mitigate adverse effects of livestock grazing on other resources and uses in the direct and indirect impact analysis. It also should compare the impacts of past, current, and future livestock grazing on BLM-administered lands.

3.1.6 NEPA—Cumulative Impacts

- What are the overall cumulative impacts of livestock grazing and vegetation treatments (such as herbicide use) on other permitted activities and resources on BLM-administered lands?
- What are the combined and interrelated effects of the BLM updating its grazing regulations and land use planning regulations concurrently?

⁴ This may also be considered a no Action alternative, given that the federal courts prohibited the implementation of the 2016 *Bush Rules in Western Watersheds Project v. Kraayenbrink, et al.*, 538 F. Supp. 2d 1302 (D. Idaho 2008), *aff'd in relevant part*, 632 F.3d 472 (9th Cir. 2011), *cert. denied*, 132 S.Ct. 366 (2011).

3.2 REGULATORY CHANGES PART 4100—GRAZING ADMINISTRATION, EXCLUSIVE OF ALASKA

- How will the BLM balance administrative actions between authorized officers (AOs) and grazing advisory boards to streamline administrative decisions?

3.2.1 Subpart 4100—Grazing Administration, Exclusive of Alaska; General

- How will the BLM quantitatively measure objectives under Subpart 4100.0-2, given that rangeland health is a subjective and qualitative standard? In addition, how will the objectives consider sustainability of natural resources and economic and environmental objectives, as outlined in the Taylor Grazing Act, FLPMA, and the Public Rangelands Improvement Act?
- How will the BLM administer public lands according to the Taylor Grazing Act and FLPMA under Subpart 4100.0-3?
- The BLM should revise the following definitions under Subpart 4100.0-5 of the grazing regulations: active use; actual use report; affected interest; affiliate; allotment; animal unit month; base property; cancelled; carrying capacity; consultation, cooperation, and coordination; grazing lease; grazing permit; grazing preference; interested public; land use plan; livestock/kind of livestock; monitoring; significant progress; and utilization.
- The BLM should remove the following definitions or terms under Subpart 4100.0-5 from the grazing regulations: conservation use, pattern of use, permitted use, seasonal utilization, and subleasing.
- The BLM should add the following terms to the definitions under Subpart 4100.0-5 of the grazing regulations: affected citizen, healthy rangelands, impoundment, indigenous animals, meeting land health standards, non-willful incidental trespass, operational flexibility, outcome-based grazing, preferential use, quantitative, valid existing rights, subleasing, and suspended use.
- Which reference will the BLM use under Subpart 4100.0-8 to avoid contradiction in the revised grazing regulations: 43 CFR 1600 or the FLPMA?
- What adaptive management language will the BLM incorporate into Subpart 4100.0-8, considering the ecological and physical restraints of the current state of BLM-administered land?
- The BLM should not implement any changes to local or state grazing districts.

3.2.2 Subpart 4110—Qualifications and Preference

- The BLM should not penalize permit applicants for not allowing public access across their private land and should not make allowing public access across private land a criterion for permit approval. Specifically, the BLM should delete Subpart 4110.1-2(d).
- The BLM should include counties in the coordination phase under Subpart 4110.2-4 of the revised grazing regulations.
- The revised grazing regulations should not result in any decrease to net carrying capacity or a decrease to ranchers' autonomy in managing their grazing allotments.
- The BLM should provide a documented reason for nonrenewal of permits under Subpart 4110.2-3 of the revised grazing regulations.
- The BLM should suspend animal unit months (AUMs) only temporarily, with the presumption that suspended AUMs will return to active status whenever the resource permits, thereby allowing suspended AUMs to be reinstated if the range warrants increased carrying capacity.

- Will permittees or lessees who have grazing preference be entitled to any increase in permitted use, at least back to the previous adjudicated preference numbers?
- The BLM should add a relinquishment clause to Subpart 4110 of the revised grazing regulations to provide guidance for relinquishing a preference/grazing permit.
- The revised grazing regulations should specify that increases in permitted use would not be authorized until the BLM has determined, through rangeland health assessments and evaluations or allotment plan monitoring, that the allotment is meeting rangeland health standards.
- In order to avoid subsequent NEPA analysis, the BLM should clearly specify or reference grazing actions that would require NEPA in Subpart 4110.3 of the revised grazing regulations.
- How is the BLM calculating AUM rates? It should follow a nationally recognized, scientifically based method to determine livestock AUMs.
- The BLM should include the following language in Subpart 4110.2-4: “(b) The AO shall not convert a dedicated stock driveway into an allotment.”
- The BLM should revise Subpart 4110-1 to require mandatory elimination of suspended AUMs from BLM term grazing permits and leases; this is to reduce short- and long-term adverse impacts associated with suspended AUMs.
- The BLM should allow the exchange of sheep AUMs for cattle AUMs in an allotment.
- The BLM should allow for an increase in AUMs on land being grazed regeneratively as the land improves.
- The BLM should use more quantitative data and techniques in monitoring or field observations under Subpart 4110.3, as well as in identifying lands available or suitable for grazing that meet ecological criteria, grazing capability factors, and legal standards. Additionally, the BLM should use quantitative monitoring that addresses allotment-specific objectives. The objectives should be based on current rangeland science that recognizes the value of identifying soil components and using ecological site concepts and their associated state and transition models and disturbance response groups or broader great groups.
- The BLM should ease existing restrictions on the use and placement of nutritional supplements on public grazing lands, so that supplementation can help implement targeted grazing and outcome based grazing projects. Additionally, the BLM should include utilization as a growing season management tool, not as a tool with the same applicability year-round.
- The BLM should remove the language stating that “an applicant shall certify to the AO that this base property meets the requirements under paragraphs (a) and (b)” in Subpart 4110.2-1 of the revised grazing regulations, given that there are no requirements under (a) or (b) in section 4110.2-1.
- The BLM should consider removing the language in Subpart 4110.1-1, given that it is not consistent with the direction contained in either Subpart 4110.3-1 or 4130.1-2. Consequently, the BLM should revise the language in Subpart 4110.1-1 to convey that acquired lands in a grazing district would be classified as Section 3 BLM-administered lands, and that the livestock carrying capacity would be offered to existing permittees, or other qualified applicants, in accordance with Subpart 4130.1-2. Lastly, the BLM should consider removing item (d) in Subpart 4130.1-2.
- The BLM should provide further clarification on how carrying capacities may be determined in areas where thresholds for wild horses and burros are exceeded. Additionally, it should ensure that wild horses be kept at appropriate management level numbers before it considers reducing

livestock AUMs. Additionally, the BLM should provide a reason for suspending AUMs and why AUMs have been diverted for other uses.

- The BLM should not allow the transfer of grazing preferences to areas that are presently not authorized for livestock grazing use, or are held in suspension, due to the potential for damage to natural resources.
- In any changes to grazing preference and qualifications, the BLM should specify that no person may qualify for grazing use who has previously failed to comply with grazing permit terms and conditions (in particular, utilization levels), repeatedly trespassed grazed on public lands, or failed to maintain enclosures or fences on public lands.
- The BLM should make increased AUMs that occur from range improvement practices available to livestock, not just wildlife and watershed use, and remove from the revised grazing regulations limitations for doing so.
- For applicants to qualify for grazing on public lands, the BLM should revise Subpart 4110.1 to require them to own or control land or water base property and be engaged in, or be facilitating the production of, livestock. The agency should also consider simplifying the base-property certification process by allowing permittees to self-certify. Additionally, the BLM should remove the “commensurability” requirement in Subpart 4110.2-1. Lastly, it should clarify in the revised grazing regulations that base property is to support a ranching operation when livestock are not grazing BLM-administered land, but that the base property is not required to fully sustain on its own the ranching operation.
- The BLM should revise the language in Subpart 4110.3 to specify that any decreases in permitted use should be based on quantitative monitoring data rather than qualitative assessments. Moreover, if quantitative data show a need to reduce active AUMs, they should be held as suspended use AUMs that can be reinstated if there are no issues for a period of time. The revised grazing regulations should allow for the AO, before making changes to lease terms and conditions, to first determine if livestock grazing is the causal factor for not achieving allotment objectives; if the current livestock grazing program is determined to be the causal factor, the BLM should first implement changes in the management program to include changes in seasons of use, duration and timing of use, or rangeland improvements. The purpose would be to accomplish a trend toward achieving allotment objectives before suspending or reducing active AUMs.

Further, the BLM should revise Subpart 4110.3-2(b) to replace its approach of being obligated for automatic decreases in AUMs whenever grazing allotments are transferred. In addition, the BLM should modify Subpart 4110.3-3 (b) to state that grazing decisions that adversely affect a Section 3 permittee from being placed into full force and effect, by the AO, should be stayed during the appeal. This is because a permittee appellant should not have to live under the terms and conditions under appeal for the often very lengthy time it takes to adjudicate the issues in the appeal.

- The BLM should revise the grazing regulations to clarify that if a permitted use for a grazing permit is to be reduced due to another permitted multiple use, any reduction would be based on field work and monitoring to quantify the actual forage lost and actual reduction in the livestock carrying capacity due to the change in use based on quantitative monitoring (rather than simply dividing the total AUMs across an allotment into the acreage lost to grazing). Additionally, the BLM should provide a refund for limited use on allotments based on a comparison of actual use versus the amount charged for initial use.

- The BLM should change the wording in Subpart 4110.3, from “needed” in line 5 to “as appropriate.”
- The BLM should revise Subpart 4110.3 by replacing “permitted use” with “active use” or “grazing preference.” It also should specify in the definition of grazing preference that permitted use is attached to base property and so may apply to “affiliates.” Finally, the BLM should include language stating that, if the entire grazing permit or lease were cancelled, the grazing preference would be cancelled too.
- The revised grazing regulations should explicitly state that the BLM would cancel AUMs when “permitted grazing use” is reduced under Subpart 4110.3-2(b). This is as opposed to suspending AUMs.
- The BLM should base AUM reductions on the condition of the allotment, not on the presence of sensitive species on allotments.
- The BLM should allow for adjudicated AUMs in active use to become available to other qualified applicants for purchase. The BLM should include the following language in Subpart 4110.2-4: “The authorized officer may combine or divide allotments, through an agreement with the permittee or lessee in the allotment or by decision, when necessary for the proper and efficient management of public rangeland.”

3.2.3 Subpart 4120—Grazing Management

- The BLM should allow greater flexibility in allotment management plans under Subpart 4120.2, so that grazing can more readily adapt to changing conditions. Additionally, the BLM should allow for the cooperative development of allotment management plans to better achieve resource allotment objectives.
- The BLM should consider changing how allotments with wild horses are managed to reduce and maintain wild horse numbers at appropriate levels to protect rangeland health.
- The BLM should encourage regenerative grazing.
- In the revised grazing regulations, the BLM should remove language pertaining to wild horses and burros in Subpart 4120.3-8, given that the Taylor Grazing Act range improvement funds should be used to improve and manage livestock grazing. Similarly, the BLM should use the range improvement fund directly only for range improvement, not for general administration.
- The BLM should include state agencies during range development planning or range improvement programs under Subpart 4120.3-8(c).
- In the revised grazing regulations, the BLM should include requirements for range improvements to prohibit seeding of or otherwise encouraging the use of nonnative species. It also should require improvements to be designed with the objective of restoring fully functional native ecosystems. The revised grazing regulations should also not allow supplemental feeding, which has the potential to import weed seeds.
- The BLM should revise Subpart 4120.3-8 of the grazing regulations to specify that three-fourths of the available funds should be expended in the district from which they were derived. The Secretary of the Interior should prioritize the remaining one-fourth of the fund for underground rehabilitation, protection, and improvement of public rangeland ecosystems. This is because such changes would empower each district with additional funds to install, modify, remove, or maintain range improvements, including ground treatments.

- The BLM should modify the grazing regulations to require a rest period of at least 1 full year following prescribed fire, as well as a rest period following prolonged droughts, during which livestock would not be allowed to graze.
- The BLM should require that livestock management avoid impacts on other wildlife and conflicts with predators. Managers should give special attention to recovering ecologically functional populations of threatened gray wolves. This would require permittees to take all necessary steps to avoid conflicts with the wolves and to use nonlethal methods to prevent or limit wolves from preying on livestock in grazing areas frequented by predators.
- The BLM should remove outdated livestock management tools and terms from the current grazing regulations, such as “improving livestock distribution.”
- In the revised grazing regulations, the BLM should include provisions regarding exchange of use agreements. It should clarify that exchange of use would be linked to the respective state law regarding “fence out” and “open range.” Further, the BLM should incorporate additional language in the revised grazing regulations regarding the ownership of fences and their removal, taking into consideration the cost and needs of future permittees.
- The BLM should allow for a more streamlined process to approve and implement range improvements, particularly water development and distribution projects in the revised grazing regulations. In particular, the BLM should modify Subpart 4120.3-1(f) to allow for the use of categorical exclusions to document range improvement projects consistent with allotment management plans and provide a basis for permit renewals.
- The BLM should include a provision for stewardship permits in the revised grazing regulations.
- The BLM should consider retaining cross fencing.
- The BLM should include a provision requiring that allotments with impaired productivity or quality of environment be noted and reported to the public, along with the measurable degree of impairment, in the revised grazing regulations.
- The BLM should include rangeland health monitoring in allotment management plans in the revised grazing regulations. This would include providing guidance for preserving the habitat value of grazed lands for native plant and wildlife species, such as removing or reducing fences to limit habitat fragmentation. The guidance should address other natural resource values, including maintaining and improving wilderness characteristics and other special values of grazed lands.
- The revised grazing regulations should allow for permittees and BLM field offices to collaborate annually to create a monitoring plan for each permit. The regulations should include a stipulation that allows for self-monitoring as a mandatory component to grazing permits. Additionally, the BLM should consider putting a consistent monitoring system in place and not a burden on permit holders.
- The revised grazing regulations should include certain provisions for rangeland improvements, including that all pipelines that provide water for livestock and wildlife be buried.
- The BLM should modify Subpart 4120.5-2 to ensure more effective management of noxious weeds by requiring the BLM to follow state laws for noxious weed control and also allow noxious weed control projects to proceed under categorical exclusions.
- The BLM should remove Subparts 4120.3-3 (c) 1, 2, and 3 from the current grazing regulations, as authorizing grazing by another person without the permission of the ranch owner would amount to confiscation of private property.

- The BLM should consider revising Subpart 4120.2-2 to allow for adjustments to livestock grazing permits so as to meet specific resource objectives, including reductions in fuel loads. Additionally, the BLM should modify Subpart 4120.2(a)(4) to include the criteria for a monitoring plan to make management adjustments.
- The BLM should reduce the regulatory burden on livestock grazers by allowing them to responsibly develop existing springs and current water sources to better control fuel load and invasive species.
- The BLM should allow Taylor Grazing Act Section 4 permitting to be used for certain range improvements paid for by the applicant, allowing permittees to construct certain range improvements with non-federal funds, or the title to range improvements should be with those who hold Section 4 permits under Subpart 4120.3.
- Range improvements should not be mandatory cooperative agreements unless the BLM finances the project. The agency also should call for Subpart 4120.3-9 and any other regulatory provision for federal acquisition and ownership of water rights to be removed from the regulations; moreover, the revised regulations should include a prohibition of such acquisition and ownership.
- Additionally, Subpart 4120 should include a requirement that the BLM acquire legal public access to any permanent range improvement on BLM-administered lands before authorizing new or presently unauthorized range improvements. Further, the BLM should grant the title to the contributors of the improvement, in accordance with their share of the contribution to the project. Lastly, the BLM should ensure that under Subpart 4120.3-6, permittees or lessees should not be “required” to remove range improvements so long as they “own” them; the agency should grant such permittees or lessees reasonable compensation for the adjusted value of their interest in authorized permanent improvements.
- The BLM should not include the conservation use permit in the revised grazing regulations, given that this provision was struck down in 1998 by the Tenth Circuit Court and never removed from the regulations.
- The BLM should revise the text in Subpart 4120.3-3, requiring range improvement permits be granted to applicants, subject to their ability to achieve applicable objectives in the land use plan for the allotment in which the permit or lease is held.

3.2.4 Subpart 4130—Authorizing Grazing Use

- To benefit wildlife management and habitat, the revised grazing regulations should allow for expanded grazing permit sales, buyouts, or retirement for long-term conservation use. The BLM should also allow permit holders to place lands into “conservation status” temporarily for maintenance, restoration, and rehabilitation.
- The BLM should modify Subpart 4130.1-2 so that applicants are not required to grant public access across private land in order to obtain approval for grazing or a grazing permit.
- The BLM should not authorize any full-year use grazing on federal land.
- The BLM should clarify the exchange of use regulations to reduce confusion and improve use of this tool to best manage intermingled private and public lands. The provisions in the revised grazing regulations should clarify that an exchange of use agreement and associated private grazing lease are not required for a grazing permittee in an open range or fence out state to receive credit for private forage that is available on unfenced private land in a BLM grazing allotment.

- The BLM should not limit family members to less than 50 percent of the AUMs on their parents' permit, as these family members may be financially assisting their parents.
- The BLM should modify the mandatory terms and conditions section in Subpart 4130.3-1 to avoid arbitrary decision-making and require carrying capacity decisions to be based on quantitative data.
- The BLM should not subject livestock control agreements to the Freedom of Information Act (FOIA) because they contain private financial information and are of no public use (see Section 4130.7 of FOIA).
- The BLM should terminate grazing authorizations in existing vacant or inactive allotments to discourage grazing in ungrazed areas for conservation and habitat benefits.
- The BLM should update Subpart 4130.3 to allow for terms and conditions to be made in consultation with livestock producers to ensure that current land conditions are properly understood.
- The BLM should add free-use grazing permits for fuel reduction to Subpart 4130.3-2 as a tool to reduce fuel on public land and prevent wildfires.
- The BLM should not subject nonrenewable grazing permits and leases to the proposed decision and protest process; this would allow the BLM Authorized Officer to better address resource concerns, targeted grazing, vegetation treatments, and fire recovery efforts.
- The BLM should ensure that consultation and coordination takes place among existing permittees, lessees, and any owners of private lands that would be involved in a livestock crossing. Additionally, it should not require crossing permits when ranchers move livestock to their own allotments.
- The BLM should clarify the definition of a "crossing authorization" (i.e., the time at which a crossing will occur and the numbers/types/class of livestock). Additionally, the BLM should be aware that trailing through or crossing BLM-administered lands during big game migration in the spring and fall may create conflicts between wildlife and livestock. This puts unnecessary pressure on wildlife during potentially stressful periods.

3.2.5 Subpart 4140—Prohibited Acts

- The BLM should revise Subpart 4140 of the grazing regulations as follows:
 - Clarify that the BLM would not take punitive action against permittees for any noncompliance beyond their reasonable control and
 - Remove "conservation use" from Subpart 4140.1(a)(2)
- The BLM should address and respond to information provided by the public regarding grazing permit violations or significant damage to natural or cultural resources, including damage that can occur from off-road use.

3.2.6 Subpart 4150—Unauthorized Grazing

- How will the BLM address unauthorized grazing and other prohibited acts on BLM-administered lands?
- The BLM should provide greater clarity on the management and enforcement of unauthorized grazing in the revised grazing regulations.
- In instances where unauthorized use is willful and results in damage to forage, the BLM should enforce punitive fees and penalties equivalent to the damage sustained. In instances where

unauthorized use is non-willful and incidental and does not impose significant damage to natural resources, the BLM should document these instances under a consistent, efficient process that does not impose punitive fees or penalties.

- The BLM should revise Subpart 4140 of the grazing regulations to allow it to informally address unauthorized grazing and trespassing that is non-willful or incidental.
- The BLM should remove permits from permit holders when they willfully commit unauthorized, out-of-bounds grazing. Additionally, the BLM should clarify what constitutes a non-willful, incidental trespass.
- Commenters request that unauthorized use issues identified in the General Accounting Office 2016 Report on grazing trespass be addressed. The BLM should establish procedures for resolving incidental use, while ensuring all discovered unauthorized use that is documented is needed.

3.2.7 Subpart 4160—Administrative Remedies

- With regard to Subpart 4160.1, the BLM should implement the following:
 - Make electronic communication available to permittees and lessees
 - Clarify exactly what decisions require a proposed decision and what decisions will be exempted
 - Eliminate the proposed decision step if the protest period is eliminated
- With regard to Subpart 4160.2, the BLM should retain the right to protest a proposed decision. It should revise this provision to clarify that only the decisions identified in that subpart require a proposed decision and protest. Additionally, the BLM should issue decisions on contested permits in a timely manner.
- The BLM should revise Subpart 4160.3 so that a grazing decision is stayed during an appeal by a Section 3 permittee.
- The BLM should simplify billing procedures for permittees and should consider billing every 5 to 10 years rather than every 2 years.

3.2.8 Subpart 4170—Penalties

- The BLM should consider revising Subpart 4170 in the grazing regulations to allow for more lenient and flexible penalties.
- The BLM should implement effective discipline measures in areas where there are conflicts of interest, nepotism, trespass, or delinquency.
- Will the BLM use a law enforcement officer to issue citations prior to impoundment when a livestock owner has not removed the livestock?
- The revised grazing regulations should provide an efficient way to enforce stricter penalties for noncompliance, such as terminating permits for permit holders who repeatedly trespass or who disregard their terms and conditions.

3.2.9 Subpart 4180—Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration

- The BLM should reevaluate whether to assess each allotment quantitatively or to remove the requirement to assess land health standards on every allotment. The BLM should also consider whether to manage grazing lands on an allotment-by-allotment basis and should consider reviewing land health conditions at a minimum of every 10 years.

- Could the BLM use existing permits to address areas that are not achieving land health in grazing allotments?
- The BLM should remove Standards & Guidelines from the grazing regulations and replace them with science-based monitoring.
- The BLM should apply health standards to all uses on BLM-administered lands, including wildlife uses.
- The BLM should establish an adaptive management framework that clarifies the responsibilities of the AO and the methods by which management decisions are made. For example, the current guidelines emphasize the AO's authority to direct management actions but does not clarify the process by which this occurs.
- In the revised grazing regulations, the BLM should incorporate the disclaimers listed in the Technical Reference 1734-6 regarding the intended uses of rangeland health assessments.
- The BLM should consider whether to continue to use land health standards as a measure for land health and requirement for permit renewal as they currently exist.
- The BLM should not loosen the current standards, as this may lead to more damage on rangeland health.
- In order to address all permitted activities, the BLM should evaluate whether to keep 43 CFR 4180 in place or move the regulations to the planning regulations section. When evaluating this, the BLM should consider the argument that land health can be argued to be a larger, more scientifically based planning area that warrants its own NEPA analysis separate from Subpart 4100.
- In the revised grazing regulations, the BLM should consider substituting *standard* with *guideline* or *desired condition*, when referring to rangeland health.
- Will the BLM continue to look to watershed or landscape evaluations of land health to achieve coordinated management across allotment boundaries?
- The BLM should extend the timeline to implement appropriate action regarding permit management changes.
- The BLM should implement the following quantitative monitoring efforts that have a definable threshold for compliance:
 - Evidence-based best management practices, as well as greater scientific backing for regulations in general
 - New indicators, such as bare ground cover, perennial grass cover, shrub cover, annual grass cover, and tree cover
 - Remote sensing for monitoring
 - Site-specific economic analysis and consideration of livestock market influences
 - Landscape-level metrics to assess rangeland health
 - The use of digital platforms that analyze rangeland areas, such as the US Department of Agriculture's National Resources Conservation Service
 - Flexible management, such that all available tools to manage grazing and other uses can be used
 - The use of random sampling methods to ensure greater accuracy of data when estimating utilization
- The BLM should include language that addresses parameters that affect grazing and their interactions, not just utilization, in the revised grazing regulations. The BLM should include the

following resources in the analysis of the draft EIS, to consider how these interconnected areas affect rangeland health: water quality; air quality and climate; soil health; vegetation, fire, and drought; wildlife; critical threats to the ecosystem, such as invasive species; all grazing animals and wild horses; infrastructure and development; roads and off-highway vehicle use; recreation and increased foot traffic; and economic impact on ranches.

- To reduce the possibility for differential implementation of regulations by authorized location, the revised rangeland health evaluations should be standardized nationally, rather than by field office. The evaluations should be led by a qualified specialist unaffiliated with the field office where the allotment is located. The BLM should also consider eliminating any reference to advisory councils from the revised grazing regulations.
- The BLM should clarify in the revised grazing regulations to accommodate a permittee's ability to demonstrate and remain in compliance, with realistic and objective standards.

3.2.10 Subpart 4190—Fuels and Fire Management

- The BLM should include wildfire protection actions in the grazing regulations, including fuel reduction treatment, land rehabilitation after wildfires, native plant growth and vegetation management promotion, proper livestock distribution (fencing and water developments), suspended grazing periods, soil health monitoring, and reseeded.

3.3 PERMITTING AND LEASING PROCESS

- How will potentially expanding the use of categorical exclusions affect environmental analysis and interested parties' ability to participate in the NEPA process? The BLM should not streamline, reduce, or eliminate the interested public's ability to participate in the NEPA process regarding grazing management decisions on public lands, including the right to protest and appeal such decisions; it should instead facilitate greater levels of public and tribal input, involvement, and engagement. The public also supported the BLM in limiting public involvement in grazing management decisions. It would do this by reducing the scope of who qualifies as the "interested public" or by eliminating the "interested public" and protest periods.
- The BLM should improve, simplify, and streamline the permitting process, by implementing the following: shortening the process to approve and implement range improvements; imposing a regulatory limit on how long a grazing NEPA process can take; prioritizing grazing permit NEPA projects over other BLM NEPA projects; bundling projects into one NEPA process, when possible; distinguishing between permits and leases; granting each State and field office the authority to increase permitting efficiency and move toward an agreed on ecological outcome with the permittee; and using outcome based grazing authorizations.
- How will efficiency measures be used to shortcut the BLM's detailed hard look analysis? The BLM should not expedite grazing permitting unless and until a scientifically based evaluation is conducted for the proposed allotment permitted for grazing.
- The BLM should expand the use of findings of no significant impacts and apply categorical exclusions to range improvement projects and certain types of permits, permit renewals, and permit transfers; examples are as follows:
 - 10-year permits
 - Site-specific applications of targeted grazing permits

- Permit renewals with terms and conditions that are substantially similar to previous environmental assessments, or if the permittee does not apply for any substantially new or different terms and conditions
- Permit renewals for grazing allotments that are maintaining proper outcomes and objectives and meeting rangeland health standards and guidelines
- Permit renewals that do not increase or decrease permitted grazing use by more than 10 percent
- Allotments where such activities as grazing or logging are already permitted

Additionally, the BLM should allow the use of categorical exclusions to document any increase in permitted use up to the historic preference AUMs

The BLM also received public support for eliminating new categorical exclusions and using expanded use of EAs and EISs for grazing management decisions.

- The BLM should build more flexibility into permits by the following:
 - Allowing for more adaptive management in rangeland improvements and allotment use, including timing and date/season of use flexibility
 - Allowing for targeted, outcome-based, emergency, and rotational grazing
 - Prioritizing allotment management plans
 - Returning Section 15 permitted lands to leases

The BLM should consider basing permits on grazing conditions instead of calendar dates, so that its AOs are able to quickly address conditions on the ground.

- The BLM should compensate permittees for cancelled permits. Additionally, it should authorize permit renewals under existing terms and conditions until the application is fully processed.
- The BLM should not allow permits to be issued for conservation uses and should not consider allotments to be eligible for buyouts for conservation.
- The BLM should grant applicants a lease only if they have deeded land tied to that allotment. Additionally, grazing permits should hold to the current lessee, unless justifiable cause is given to reassess the situation or the allotment changes hands.
- Where allotment owners choose to enter into cooperative agreements to share the costs of improvements, range studies, investigations, or management plans, the revised grazing regulations should plainly state that those permits, contracts, and other instruments are subject to valid existing rights. Also, all other activities should be subordinate and secondary to the allotment owner's surface property rights for raising stock.

Additionally, none of the surface allotment owner's land, water, improvements, forage, or other property interests should be infringed on in any way without due process, just compensation, and consent of the State legislature, as required by law. Where the allotment owner chooses not to enter into cooperative agreements with the US Department of Agriculture or Department of the Interior, federal employees should be demoted, fired, or otherwise punished (under Title 18 USC 241) and held accountable for harassing allotment owners or encouraging trespassers to destroy, steal, or otherwise violate the property rights of allotment owners.

- The BLM should implement various changes regarding permit transfers, exchanges, and retirements. An example of this is allowing or not allowing grazing permit/allotment retirements/reductions. It should also simplify the process of grazing preference transfer and

transition to family lease holders. Finally, the BLM should eliminate subleasing prohibitions and do away with subleasing surcharges.

- Because commenters feel that the permit renewal process is too lengthy and inefficient, the BLM should implement the following measures:
 - Impose a 10-year minimum term on permits or eliminate the 10-year term renewal requirement and extend permit terms to 20 or 30 years
 - Notify permittees of when they are required to submit permit renewal applications
 - Develop a process for the rapid renewal of permits if operators are in compliance with permit terms and conditions, if they have not been negligent in their allotment management, and if there are no important changes for biological, ecological, or management issues since the last permit renewal
 - Establish regulations for automatic renewal of permits, pursuant to section 402(c) of FLPMA, without the need to issue a decision or create a subsequent appeal process
 - Collect monitoring data throughout the term of the permit and include an accurate and site-specific ecological and economic analysis with every permit renewal

3.4 GENERAL CHANGES TO REGULATIONS

- The BLM should include the following changes in the revised grazing regulations regarding permits:
 - Include incentives for proactive permittee activities that address particular resource challenges, that provide enhanced habitats for at-risk species, or that otherwise go beyond the strict terms of a permit. These incentives could include extended permit lengths, increased levels of permitted AUMs, and increased permit flexibility.

Additionally, the new grazing regulations should provide direction on how range readiness should be used and incorporated into grazing permits. Their purpose is to allow flexibility for the BLM to delay or move up turnout, depending on conditions on the range.

- The BLM should implement the following:
 - Restructure every grazing permit so that grazing is allowable 12 months out of each year
 - Make extended season, change of season, or amount of use triggers mandatory when fuel loads exceed 10 percent over normal maximum or when the producer has used less than 90 percent of allowable forage, with normally permitted numbers, during regular grazing season
 - Require local land managers to trigger out-of-season turnouts, whenever conditions pose a threat to overall range health
 - Give ranchers a local arbitration board, made up of agency personnel and local producers, to appeal any rejection of proposed out-of-season turnouts.
- When feed is abundant, the revised grazing regulations should provide for additional livestock use by allowing increased numbers or duration of grazing season. Preference should be given to those permittees with suspended AUMs.
- The BLM should use targeted grazing for fuel reduction and noxious weed control and should allow greater flexibility in using grazing to address and reduce fuel loading on public lands. The BLM should also use free-use permits to manipulate vegetation to reduce fire risk.

The BLM should revise grazing regulations to establish how and when targeted grazing can be authorized. This is to provide for specific vegetation treatments to meet vegetation management objectives, including those to provide for fuel breaks and fuel load reduction projects. This would reduce wildfire risks and promote opportunities to enhance wildfire suppression, should it be necessary.

- The BLM should require the permittee to coordinate with abutting private landowners to address fencing and trespass issues by, as an example, using the cooperative range improvement agreement process.
- The BLM should not require water to be a condition of permit issuance.
- The BLM should use a merit-based system with livestock operators who get rewarded for adhering to regulations and being good stewards of the land.
- The BLM should informally tier unauthorized grazing procedures with the defined minor infractions being addressed, and it should tier more serious or repeat offenses higher, requiring penalties and fines and, if need be, impounding livestock.
- These regulations should require the BLM to coordinate, consult, and cooperate with existing permittees before giving a crossing permit to the applicant.
- For temporary nonrenewable (TNR) permits, the BLM should include measures to allow for targeted cheatgrass grazing or other fine fuels control through TNR-type measures
- For nonrenewable permits and leases, the BLM should issue decisions that are immediately effective and should provide permittee flexibility to manage for such factors as fluctuations in weather. Additionally, the BLM should create provisions to cover situations where permittees annually request authorization for additional forage use. Such provisions would be similar to temporary nonrenewable use under existing BLM term grazing permits.
- The revised grazing regulations should focus more on opportunities for outcome-based grazing and adaptive management. The BLM should provide oversight for livestock owners so that professional ecologic assessments are the basis for any grazing management change.
- The revised grazing regulations should include wholesale changes from “permit holder” or “permittee” to “preference holder.”
- The revised grazing regulations should identify livestock grazing permittee names and addresses as private information not to be disclosed under Exemption 6 of the FOIA.
- The BLM should also not allow the purchase and retirement of grazing permits.
- The BLM should protect grazing permits that are waived without preference. When permittees retire their operations with no specific persons to pass on their permits, the allotments in those permits should still remain open to grazing.
- The BLM should subsidize native ruminant reintroduction and ranching and offer tax credits and lower grazing fees for native grazer ranching.
- The BLM should allow temporary nonuse to accomplish management objectives and restore the operative limit of 3 consecutive years of nonuse for personal and business reasons.
- The BLM should not require that trailing authorizations go through a proposed decision and protest period.
- The BLM should require permittees to be in the livestock business.

- The BLM should include the following changes in the revised grazing regulations regarding AUMs:
 - When there is a 5-year documented trend of increased rangeland health, the BLM should return suspended AUMs to active status, in proportion to the documented percentage increase in each year following 5-year trend establishment.
 - When allotment AUMs are reduced by something like mining, the BLM should use the appropriate science to calculate the AUM reduction.
 - The BLM should set a fair and equitable cost for a grazing fee, based on comparable private land prices.
 - The BLM should reinstitute suspended AUMs if, for any reason, their use would become viable for any number of reasons.
 - The BLM should spend a sufficient amount of time to address AUMs in the revised grazing regulations and to implement appropriate management changes.
 - The BLM should retain any suspended AUMs on all grazing permits under the preference holder's name.
 - The BLM should not implement the proposal in Montana's resource management plans to consider a .7 yearling percentage as equal to a full AUM.
- The BLM should include the following in the revised grazing regulations regarding allotment management:
 - When livestock have been vacated from an allotment by force, regulation, or otherwise, the BLM should continue monitoring rangeland health on that allotment.
 - When livestock allotments are closed, the BLM (as the new de facto permittee) should take on the responsibility of maintaining the existing improvements on the allotment.
 - The BLM's resource advisory committee should continue to review rangeland improvements and allotment management plans. The BLM should also continue to engage in emergency public consultation. Additionally, annual grazing plans should be organized and made by the Department of the Interior cooperating with the permit holder.
 - The BLM should require grazing management to improve carbon sequestration in soils, address climate change impacts, and preserve habitat.
 - The BLM should facilitate timely livestock movement to and from grazing allotments.
 - The BLM should revise the exchange of use agreements to clarify that exchange of use will be linked to the respective State law regarding fence out and open range.
 - The BLM should make explicit in the revised grazing regulations the necessity of testing water quality.
 - The BLM should allow for range improvements to be owned by permittees if they provide the labor and materials.
 - The BLM should ensure that any predator control measures are nonlethal and scientifically measured for species protection over their range.
 - The BLM should use a 30 percent utilization rate to reduce riparian trampling, invasive species, and erosion. Additionally, it should incorporate a nonuse option for permittees annually for up to 10 years, and it should review allotment health conditions at least every 10 years.
 - The BLM should quantify available water on allotments, by monthly measuring active arroyos and active water wells in and around the allotment, and by adding and monitoring rainfall

measuring stations. Additionally, the BLM should use grass surveys and aerial photography to document grazing effects. This should happen at least every 3 months and immediately after microbursts.

- The BLM should improve monitoring and enforcement of measures to protect against the impacts of road rutting and unauthorized road creation.
- The BLM should require cited grazing violators to manually remove cheat grass.
- The BLM should recruit such participants as local schools and churches to adopt allotments and provide for their oversight and care.
- The BLM should document the presence of cryptobiotic soil and changes at least every 3 months.
- The BLM should mandate periodic zero grazing periods for every allotment. Additionally, it should determine the frequency and duration of grazing using previous years' climate and grazing data.
- The revised grazing regulations should specify how the changes support the BLM's ability to make livestock grazing and range development decisions that enhance and protect known or suspected migration corridors and big game winter range.
- The BLM should allow range management plans where federal land is intermingled with deeded land and used as winter pasture; feed credits should be permitted, as long as rangeland health guidelines are maintained. In these pastures, the BLM should permit feeding on federal land, especially on previously farmed land.
- The BLM should implement the following in the revised grazing regulations regarding information affecting grazing and its administration and management:
 - Use the best available science to make future decisions that are unbiased
 - Not use ecological site descriptions in decisions and management changes
 - Track site-specific economic data of grazing fees and the costs of permit administration
 - Apply adverse rangeland health determinations only to specific pieces of land and not across pastures or allotments
 - Require accurate population numbers for grazing cattle and sheep, which should be removed if it is shown that they are degrading the public lands and the water
 - Incorporate the disclaimers listed in the Technical Reference 1734-6 regarding the intended uses of rangeland health assessment
 - Base any long-term grazing decision or permit renewal on long-term, objective quantitative data. This data should be for valid monitoring protocols, acceptable under current rangeland science standards; to assist with monitoring and data collection for both short-term and long-term grazing decision-making, incorporate cooperative monitoring in the revised grazing regulations, as outlined in the memorandum of understanding with the Public Lands Council
 - Eliminate the use of the BLM's program to assess proper functioning condition on riparian areas
 - Revise the BLM's process of trying to evaluate utilization before the end of the growing season
 - Support any use of targeted grazing on public lands by a robust and public environmental analysis of the cost/benefits of using targeted grazing

- Use remote sensing, where appropriate, and include local universities and the Society for Range Management in discussions of other ways to evaluate rangeland health quickly and effectively
- Incorporate into the BLM’s revised grazing regulation any findings that would increase administrative efficiency from its outcome-based grazing program
- Require monitoring of ecological site and current ecological site potential, as shown by state and transition modeling, when assessing effects of management actions and effectiveness of management actions in reaching objectives
- Evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles, and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions
- The BLM should modify base property provisions in the revised grazing regulations as follows:
 - Ensure that base property requirements are retained; also clarify that the base property supports a ranching operation when livestock are not grazing BLM-administered land but that it is not required to fully sustain the ranching operation on its own
 - Move away from using base property as the sole means to establish qualification for preference

3.5 COMMENTS MADE REGARDING THE 2006 REGULATIONS

- The BLM should not base any domestic livestock reductions on the 2006 EIS decision by Judge Winmill; this is because there are several research documents published by the Society for Range Management to dispel the decision by Judge Winmill.
- The BLM should correct the published grazing regulations to conform to the 2006 EIS decision, especially for the terms “streamlining grazing administration” and “flexibility.”

3.6 TAYLOR GRAZING ACT

- The BLM should further specify the qualifications for grazing permit applicants and grant permits only to applicants in the livestock grazing industry. The BLM also needs to distinguish between permits and leases in the revised grazing regulations.
- The BLM’s revised grazing regulations should adhere to Taylor Grazing Act definitions and language by prioritizing land use for food production and distinguishing between a grazing district (Section 3 of the Taylor Grazing Act) and “isolated or disconnected lands” that lie outside of grazing districts (Section 15 of the act).

3.7 FEDERAL LAND POLICY AND MANAGEMENT ACT

- The BLM should update the definition of a land use plan to reference the FLPMA and not 43 CFR 1600. Also, it should recognize the FLPMA as the only legal authority for the land use process; this is because 4100 land use plans may be in excess of congressional intent of the FLPMA and restrict the Secretary of the Interior’s ability to determine the content and purpose of land use plans.
- The BLM should impose a 1-year limit on NEPA planning and documentation and refer delays to resource advisory committees (RACs) to be assessed, per Section 309 of the FLPMA.
- For the definitions of consultation, cooperation, and coordination in the grazing regulations, the BLM should return to the pre-1995 definitions, so as to be consistent with the FLPMA. Additionally, the BLM should make the following updates in the revised grazing regulations:

- Remove Section 4150 from the grazing regulations, as law enforcement is also covered under FLPMA
- apply Section 102.8 of FLPMA to recognize the historical status of ranching operations
- Distinguish between Section 3 and Section 15 of FLPMA in the revised grazing regulations

3.8 OTHER LAWS

- How will the BLM ensure that the revised grazing regulations and land health standards are in compliance with the Endangered Species Act and the Data Quality Act? To comply with the Endangered Species Act, the BLM should consider management that conserves listed species.
- The BLM should reverse some of the stipulations under the Endangered Species Act and lift restrictions on livestock grazing in the revised grazing regulations.
- The BLM should strengthen and review protections for historic properties and cultural sites and should identify livestock management that minimizes impacts on cultural resources.
- The revised grazing regulations should comply with the following: EO 13771, Reducing Regulation and Controlling Regulatory Costs; EO 13777, Enforcing The Regulatory Reform Agenda; EO 13790, Promoting Agriculture and Rural Prosperity in America; EO 13855, Promoting Active Management of America's Forests, Rangelands, and Other Federal Lands to Improve Conditions and Reduce Wildfire Risk; and EO 13790, Promoting Agriculture and Rural Prosperity in America.

3.9 CONSISTENCY WITH FEDERAL/STATE/LOCAL PLANS

- The BLM should ensure coordination and consistency with county, state, and local plans, policies, and proposals when revising the current grazing regulations; it also should observe county codes and county master plans that oppose grazing restrictions.
- Permittees, not the BLM, should hold water rights to allotments; this is because permittees “make beneficial use of the water,” as required by Idaho Water Law.
- In the revised grazing regulations, the BLM should not tier them to outdated RMPs, which do not address such concerns as climate change and forest health.
- The BLM should analyze and disclose how its proposed grazing regulation revisions would affect existing RMPs, land use plans, and Greater Sage-Grouse plan amendments.
- The BLM should review the Land and Natural Resources Plan and Policies for Rio Blanco County or visit the White River and Douglas Creek Conservation District's website at www.whiterivercd.com. Also, the agency should include the appropriate historical context in the revised grazing regulations.
- The BLM should support valid existing transportation, mineral, and grazing privileges in the subject lands at the highest reasonably sustainable levels.

3.10 SPECIAL DESIGNATIONS

- The BLM should not allow targeted grazing, outcome-based grazing, streamlined grazing actions, or flexible grazing permits in areas of critical environmental concern, wilderness areas, lands with wilderness characteristics, or wilderness study areas; this is because these actions harm natural values and public lands and disrupt solitude and primitive recreation.

3.11 WILD AND SCENIC RIVERS

- The BLM should analyze and adopt grazing regulations that ensure grazing management preserves and improves the outstandingly remarkable values of designated Wild and Scenic Rivers.

3.12 WILDERNESS AREAS

- The BLM should require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands.
- In cases where livestock significantly affect wilderness characteristics, the BLM should consider reducing livestock numbers or retiring certain grazing allotments.
- How might livestock grazing reduce opportunities for solitude offered by wilderness-quality lands?

3.13 WILDERNESS STUDY AREAS

- The BLM should address the management and protection of wilderness study areas.
- The BLM should consider whether there are too many wilderness study areas and whether a reduction of minor areas should be eliminated. Additionally, the BLM should review the study of proposed wilderness and update guidelines.
- The BLM should consider removing certain wilderness study areas from its inventory so that these areas may be actively managed and regenerated.
- The BLM should allow grazing where it is permitted currently and where it was permitted historically, regardless of wilderness status.
- The BLM should allow water access and storage in wilderness areas.

3.14 LANDS WITH WILDERNESS CHARACTERISTICS

- The BLM should analyze and adopt grazing regulations to ensure that grazing management projects preserve, improve, and maintain wilderness characteristics and other special values in areas where the BLM or the public has found such values to be present.
- The BLM should require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands.
- The BLM should uphold that activities or facilities established before an area's designation as wilderness should be allowed to remain in place and that they may be replaced when necessary for the permittee to properly administer the grazing program. Additionally, the BLM should allow to continue any livestock grazing that was previously allowed on lands designated in the wilderness system.
- The BLM's revised grazing regulations should include provisions to prohibit de facto wilderness designations by managing lands to maintain wilderness characteristics. The revised grazing regulations should also expressly prohibit grazing decisions that are influenced by lands with wilderness characteristics.

3.15 CLIMATE AND METEOROLOGY

- In the revised grazing regulations, the BLM should include requirements for livestock grazing to improve carbon sequestration in soils.

- The BLM should incorporate a qualitative and quantitative climate change impact analysis to inform decisions on grazing permitting and the proposed regulations. The climate change impacts that the BLM should consider are as follows:
 - Greenhouse gas emissions
 - Rising temperatures
 - Changes in precipitation
 - Extreme weather, such as drought
 - Species extinction
 - Effects of dust on snowmelt rate
 - Wildfires
 - Soil carbon

The BLM should also consider mechanisms for rangeland restoration to mitigate these effects.

3.16 SOIL RESOURCES

- The BLM should analyze how livestock grazing may affect soils and biological soil crusts on grazing land; it also should address ways to protect and restore soil integrity/health and biological soil crusts, while minimizing disturbances from livestock grazing.
- The BLM should update the grazing regulations to require periodic soil testing and evaluations as ways to monitor soil health over time and inform future grazing decisions.

3.17 WATER RESOURCES

- The BLM should consider drilling wells for water pipelines and recognizing private water rights, to allow for better water distribution and use within a grazing allotment.
- The BLM should analyze and adopt grazing regulations that ensure that grazing management protects and improves, not degrades or reduces, water availability, quality, and quantity on allotments.
- As part of the revised grazing regulations, the BLM should ensure that riparian ecosystems in grazed areas are maintained in a healthy condition.
- The BLM should prioritize implementing range improvement projects, such as water development and distribution in grazing allotments.
- The BLM should consider adopting control mechanisms to limit the amount of fugitive dust from livestock grazing, given the consequences that fugitive dust may have on water scarcity in grazing allotments.
- In its grazing regulation updates the BLM should address the significant negative impacts the cattle industry can have on water resources, especially in the western United States.

3.18 WETLANDS AND FLOODPLAINS

- How will updates to the grazing regulations affect objectives for aquatic resources?
- How can range scientists better support the BLM's program to assess proper functioning condition on riparian areas?
- The BLM should exclude livestock from sensitive wetlands and floodplains on public lands, so as to prevent degradation of and damage to riparian areas.

- The BLM should fully analyze and include scientifically substantiated research for the impacts of livestock grazing on riparian ecosystems. Additionally, the revised grazing regulations should allow the BLM to review how current management is or is not effectively addressing the negative impact of grazing on riparian ecosystems, native riparian vegetation, native aquatic species, and native wildlife.
- The BLM should implement all General Accounting Office recommendations, including establishing finite goals for riparian-area restoration and annually measuring the progress made to achieve those goals.

3.19 VEGETATION

- The BLM should disclose the impacts on perennial grasses and biotic crusts from grazing and associated activities, especially as a method to reduce fire risk.
- The BLM should revise rangeland health standards in order to reduce invasive plants; commenters feel that the BLM's current weed strategy fails to regulate livestock disturbance or other causes of weeds.
- How will livestock grazing contribute to the spread of invasive species, especially cheatgrass, and what are the consequent impacts on native vegetation, wildlife habitat, and wildfire?
- The BLM should develop more water sources in roadless areas so that sheep and goats can be used to control noxious weeds.
- The BLM should require a measurable use and trampling standard in upland and riparian communities.
- The BLM should allocate more resources to fight off invasive species of noxious weeds. Additionally, it should make a greater effort to include and collaborate with local entities and lease holders to manage pests and invasive species. The BLM should consider looking to private landowners, watershed managers, and other entities that have successful plans to combat invasive species.
- The BLM should consider using grazing to reduce invasive species spread and should collaborate with permittees to improve invasive species management.
- The BLM should include in the revised grazing regulations measures to help control invasive species; examples are to consider surface-disturbing activities in stocking rates and utilization of grazing allotments, to recognize dormant season use coupled with typical grazing season in permit renewals, to allow flexibility in off dates on grazing allotments, and to map invasive weed populations.

3.20 BIOLOGICAL RESOURCES

- The BLM should thoroughly consider the impacts that livestock grazing may have on native wildlife, plants, and their associated habitats.
- To reduce the spread of invasive plant species, including cheatgrass, the BLM should adopt stricter regulations for monitoring the movement of livestock on public lands.
- The BLM should not allow grazing livestock to remove native species of plants or animals or to degrade prairie ecosystems.

3.21 FISH AND WILDLIFE

- The BLM should take a science-based approach to prioritize native wildlife and associated habitat protections, as well as protections for native plant species, over livestock grazing on public lands.
- The BLM should also consider the following: best available science indicating that big horn sheep can catch pneumonia from domestic sheep, leading to rapid species decline; the impacts of fences on wildlife behavior, population dynamics, and migration of big game and other wildlife; the impacts on sensitive wildlife and habitat from the increase in permittee road use for water hauling and livestock feeding under targeted grazing and outcome based grazing.
- The BLM should analyze the benefits of livestock grazing on wildlife populations, vegetation productivity, water yield, and groundwater aquifer recharge. Additionally, the BLM should note that the science about disease transmission between domestic sheep to big horn sheep is not certain, so management decisions should not be based on this issue. Further, the BLM should do more to control excessive wildlife populations that overgraze and deplete livestock forage.
- In the revised grazing regulations, the BLM should change “carrying capacity” to “domestic livestock carrying capacity”; this is because a distinction should be made between livestock forage and forage appropriated to wildlife and other conservation purposes in order to comply with BLM’s multiple-use mandate.

3.22 SPECIAL STATUS SPECIES

- The BLM should take a science-based approach to prioritize the protection of special status species on BLM-administered lands. This is because livestock grazing on public lands can degrade critical habitat for these species. For example, managing Greater Sage-Grouse coexistence alongside cattle should depend on best available conservation science and established grazing techniques designed to mitigate impacts on Greater Sage-Grouse and their habitat.
- The BLM should analyze the potential impacts of livestock grazing on special status species and state the species of greatest conservation.
- The BLM should consider the impacts of watering systems used to manage cattle on special status species. This is because such systems can dewater natural springs and create thousands of potential breeding grounds for mosquitos carrying the West Nile virus, which is deadly for Greater Sage-Grouse. Moreover, fencing that is associated with watering systems fractures and destroys sagebrush habitat.
- The BLM should use livestock grazing to meet short grass requirements for young Greater Sage-Grouse.

3.23 WILD HORSES AND BURROS

- The BLM should urgently address the increasing wild horse populations on grazing allotments, which contribute to significant degradation of the range ecosystems, harming livestock and wildlife. To address this issue in the revised grazing regulations, the BLM should promptly remove wild horses from private or permitted lands on notice, should manage wild horses as livestock and meet a designated carrying capacity, and should identify and differentiate between wild horse usage, wildlife usage, and livestock usage of water and forage resources.
- To protect wild horses and burros and their habitat, the BLM should consider wild horses as valuable assets that promote tourism and associated economic opportunities and close appropriate areas of public lands to livestock grazing.

- The BLM should partner with other agencies to effectively control wild horse populations on grazing lands.
- The BLM should consider methods to remove or reduce the number of wild horses on rangelands where livestock are grazing. Additionally, the BLM should establish herd management areas and maintain desired numbers for wild horse populations.
- The BLM should consider the associated social impacts of wild horse and burro management, given that the vast majority of the public supports protecting wild horses and burros on public land, while only a small minority support livestock grazing.
- The BLM should update the grazing regulations to reflect the priority of wild horse and burro protection over public land grazing. It should do this by redefining carrying capacity to separate forage used by domestic animals versus that used by wildlife, making stocking numbers consistent with carrying capacity, and removing wild horses and burros from allotments that have been declared horse free.

3.24 RENEWABLE ENERGY

- The BLM should analyze the potential impacts of the cattle industry on renewable energy development opportunities on BLM-administered lands.

3.25 PETROLEUM RESOURCES

- The BLM should closely monitor and control oil and gas activities on permitted grazing lands, and it should notify livestock grazing permit holders of new oil and gas development on grazing lands.
- In the revised grazing regulations, the BLM should address such surface use activities as oil and gas well pads and roads that could reduce the availability of forage for livestock grazing.

3.26 FUELS AND FIRE MANAGEMENT

- The BLM should implement the following measures for wildfire protection: fuel reduction treatment; land rehabilitation after wildfires; native plant growth and vegetation management; proper livestock distribution (fencing and water developments); suspended grazing periods; soil health monitoring; and reseeding.
- Does the BLM have the staff to effectively monitor fuel management projects?
- The BLM should examine the potential effects of targeted grazing on the wildland-urban interface, especially as compared to other vegetation removal methods, such as spraying, mechanical removal, and prescribed burning. Particularly, the BLM should examine the effect of targeted grazing on the wildland-urban interface in remote, rural communities with few or no nearby fire protection crews or tools.
- In its revised grazing regulations, the BLM should provide specific guidance for implementing targeted grazing that minimizes negative short- and long-term impacts on wildlife and associated habitat. The rangeland health section of the regulations should include natural wildfires as an ecological process that needs to be maintained to support healthy species populations and communities.
- The BLM should ensure that grazing practices for managing wildfire risk follow the best available peer-reviewed science.
- The BLM should consider forest management and wildfire mitigation techniques to maintain healthy forests and reduce vulnerability to wildfires but do not involve livestock grazing.

- In the revised grazing regulations, the BLM should consider removing language that suggests grazing is a tool to reduce wildfire or to improve rangeland conditions.
- The BLM should evaluate the contribution of livestock grazing in spreading cheatgrass and accelerating fire cycles; it should provide more opportunities for the public to evaluate site-specific proposals for fire-related livestock actions.
- The BLM should allow livestock grazing to reduce fuel loads and the risk of wildfire, specifically using targeted grazing in rural areas and in the wildland-urban interface, where homeowners are concerned about fires. In addition, the BLM should address other tools that it could use, along with livestock grazing, to reduce wildfire risk, including herbicides, prescribed fire, and native plant seeding.
- The BLM should revise the grazing regulations to address and include passive restoration methods on rangelands.
- The BLM should analyze the support and expansion of rural firefighting programs.
- The BLM should give permit and lease holders more flexibility to make decisions on wildfire mitigation on their allotments, and it should authorize permittees to manage excessive fuels on their allotment.

3.27 CULTURAL RESOURCES

- The BLM should recognize as cultural resources and protect ranches in use before the past 50 years and longer, in accordance with Section 106 of the National Historic Preservation Act.
- The BLM should analyze the impacts on cultural resources of reducing livestock numbers.
- The BLM should analyze and adopt a management and administrative approach to livestock grazing that provides the maximum level of protection for known and unknown cultural and historic resources on BLM-administered lands.
- The BLM should strengthen and expand its regulatory review and protections for historic properties and cultural sites on public lands; this is because grazing, especially concentrated grazing, can be highly detrimental to these properties and sites.
- How will the BLM ensure the protection of archaeological sites and springs on grazing lands?
- The BLM should conduct cultural surveys across lands where targeted grazing, outcome-based grazing, and other intensive or severe grazing may take place; also, the BLM should fully document the potential impacts on cultural resources.

3.28 TRIBAL INTERESTS

- The BLM should consult and coordinate with tribes when making grazing decisions that could impact their traditional homelands.
- The BLM should consult with local family groups to identify and disclose underlying indigenous land claims.
- The BLM should not remove land health standard requirements on allotments; this is because removing these standards could result in the environmental degradation of tribal lands.

3.29 ENVIRONMENTAL JUSTICE

- The BLM should address and analyze environmental justice issues.

3.30 TRANSPORTATION

- The BLM should allow mechanical and wheeled vehicles into roadless areas to control noxious weeds on BLM-administered lands.
- The BLM should pursue giving Title V rights-of-way to counties for all county roads, and it should provide written assurance that the counties still have the right to challenge for RS2477 rights-of-way.
- The BLM should reduce current restrictions for using BLM-administered gravel for surfacing all-weather county roads.

3.31 ECONOMY

- What are the economic impacts of having private inholdings on BLM-administered lands?
- How will economic markets be affected by updates to the grazing regulations, and how will the BLM analyze site-specific economic concerns?
- Will the BLM adjust grazing fees and AUM rates during the updates to the grazing regulations, and will it make these adjustments equivalent to market rates?

3.32 LIVESTOCK GRAZING

- The BLM should analyze impacts on grazing from the following: the introduction of new species or a reintroduction of species; allotment management; travel and transportation; no grazing alternatives; and changes in forage, including changes from invasive species.
- The BLM should use assessments and monitoring to evaluate livestock grazing management.
- The BLM should consider removing livestock from its easements 2 weeks before hunting seasons open.
- The BLM should analyze the impacts of livestock grazing on rangeland conditions, such as the occurrence of fires and the relationship between grazing and the potential improvement of rangeland conditions.
- The BLM should also analyze the potential impacts on livestock predation from revising the grazing regulations, and it should address lethal and nonlethal methods of predator control, as well as carnivore/livestock coexistence mechanisms.

3.33 LANDOWNERSHIP AND USE

- The BLM should increase flexibility in relation to intermingled ownership, where state leases are linked to BLM leases; this would allow for more rapid and effective management responses to rangeland issues across landownership boundaries and on a landscape level.
- The BLM should clarify the trailing/crossing permits process and consider solutions to impacts caused by trailing/crossing livestock across public lands.
- The BLM should explore how grazing regulation changes affect other public land users and industries that require access to public lands.
- The BLM should streamline the exchange process for checkerboard land patterns to allow private livestock operators to be less dependent on public lands.
- The BLM should revise the grazing regulations to return to priority positions under the Taylor Grazing Act, in which allotments were allocated to commensurate property or preference rights. These revisions should emphasize multiple use concepts.

- The BLM should consider its isolated tracts that could be exchanged for landowner tracts or sold to existing leaseholders, which could eliminate access issues.
- The BLM should consider the full spectrum of impacts on western public lands from domestic livestock grazing.
- The BLM should revise the exchange of use agreement provisions in the grazing regulations, clarifying that exchange of use would be linked to the state law regarding fence out and open range.
- The BLM should discuss all actions that may create new property rights for ranchers for water and range installations as a result of the revised grazing regulations.

3.34 SOCIAL SYSTEMS

- How will the BLM address the public's perception that the training of beginning range specialists is deteriorating and the inherent issues with the continuous turnover and reassignment of these specialists? The BLM should strengthen the retention of rangeland specialist staff in the location where they are hired.

3.35 RECREATION

- The BLM should clearly define vehicle access by the public on BLM-administered lands and strengthen education and strict enforcement of violations to prevent environmental degradation by motorists.
- The BLM should restrict public access, all-terrain vehicles, and other motorized vehicles during spring thaws to prevent damage to rangelands.
- The BLM should consider the potential impacts from grazing on recreation, including those due to lost opportunities for wildlife viewing, independent research and photography, and human need for solitude and meditation. In this analysis, the BLM should include all details of research studies and methods of research used for these studies and the names of public agencies or private/educational institutions providing the data.
- The BLM should include an analysis of the potential impacts of grazing on wildlife-related recreation. The BLM should use this interacting mapping tool at <https://www.azgfd.com/Recreation/ValueMapping>. It should incorporate this data into the draft EIS and other NEPA planning documents, as well as other state data and data providing economic information for wildlife-related recreation.
- The BLM should analyze and adopt regulations that reduce conflicts between grazing and recreationists on BLM-administered lands, including primitive recreation, wildlife viewing and photographing, connecting with the natural environment, and experiencing solitude and other outstandingly remarkable values.

3.36 PUBLIC HEALTH AND SAFETY

- The BLM should consider externalities associated with producing livestock for human consumption and the associated potential impacts on public health.
- The BLM should consider the potential impacts on public health from reducing regulation and oversight of grazing on public lands, specifically the potential for an increase in diseases that can animals can transmit.

This page intentionally left blank.

Chapter 4. Future Steps

4.1 FUTURE STEPS AND PUBLIC PARTICIPATION OPPORTUNITIES

The next phase of the BLM's rulemaking process is to draft a proposed rule and develop a draft EIS, along with a range of alternatives, based on the issues presented in the previous chapter. The BLM will complete a detailed analysis of the alternatives and then will identify its preferred alternative. The alternatives will address issues identified during scoping and will meet goals and objectives to be developed by the BLM's interdisciplinary team. In compliance with NEPA, the Council on Environmental Quality regulations, and BLM regulations and guidance, the alternatives should be reasonable and implementable.

The BLM will also meet with cooperating agencies and interested tribes. The BLM will consider invitations to meet with community groups and individuals on request.

The draft EIS will document the analysis of the alternatives. Although the BLM welcomes public input at any time during the environmental analysis process, the next official public comment period will begin when the draft EIS is published, which is anticipated to be in summer of 2020. Availability of the Proposed Rule and draft EIS will be announced in the *Federal Register*, and a public comment period of at least 60 days will follow. The BLM will hold public meetings during the draft EIS comment period.

At the conclusion of the public comment period, the BLM will revise the draft EIS and will publish the final EIS. It will announce the availability of the final EIS in the *Federal Register*. The date that the notice appears in the *Federal Register* will begin the required 30-day waiting period before a record of decision (ROD) may be issued. Although this is not a formal public comment period, the BLM may receive comments. If there are comments on the final EIS, the BLM will determine if the comments have merit—for example, if they identify significant new circumstances or information relevant to environmental concerns and bear upon the proposed action, or if the comments note a correction to be addressed. The BLM may address any comments received on the final EIS in the ROD.

The BLM will prepare a Final Rule and a ROD to document the selected alternative and any accompanying additional mitigation measures, and the approving official will sign it. No action concerning the proposal will be allowed until the ROD has been issued, except under conditions specified in Council on Environmental Quality regulations at 40 CFR 1506.1.

4.2 CONTACT INFORMATION

The public is encouraged to participate throughout the rulemaking process for the EIS. Those wishing to be added to or deleted from the distribution list, wishing to change their contact information, or requesting further information may email a request to BLM_WO_grazing_email@blm.gov or mail a request to the following address:

Bureau of Land Management
ATTN: Seth Flanigan
3948 S Development Ave.
Boise, ID 83705

Please provide your name, mailing address, and email address. Before submitting written comments on a NEPA action, be advised that your entire comment, including personally identifiable information, such as your address, phone number, and email address, may be made publicly available at any time. While you can request that your personally identifiable information be withheld from public review, the BLM cannot guarantee that it will be able to do so.

Chapter 5. References

BLM (United States Department of the Interior, Bureau of Land Management). 2008. Handbook H-1790-I-Scoping. BLM, Washington, DC. January 30, 2008.

This page intentionally left blank.

Appendix A

Notice of Intent

personnel and individuals at guard stations is password-protected; each person granted access to the system at guard stations must be individually authorized to use the system. A Privacy Act Warning Notice appears on the monitor screen when records containing information on individuals are first displayed. Data exchanged between the servers and the systems at the guard stations and badging office are encrypted. Backup tapes are stored in a locked and controlled room in a secure, off-site location.

Computerized records systems follow the National Institute of Standards and Technology privacy and security standards as developed to comply with the Privacy Act of 1974, 5 U.S.C. 552a; Paperwork Reduction Act of 1995, 44 U.S.C. 3501–3521; Federal Information Security Modernization Act of 2014, 44 U.S.C. 3551–3558; and the Federal Information Processing Standards 199: Standards for Security Categorization of Federal Information and Information Systems. Security controls include user identification, passwords, database permissions, encryption, firewalls, audit logs, and network system security monitoring, and software controls.

Access to records in the system is limited to authorized personnel who have a need to access the records in the performance of their official duties, and each user's access is restricted to only the functions and data necessary to perform that person's job responsibilities. System administrators and authorized users are trained and required to follow established internal security protocols and must complete all security, privacy, and records management training and sign the DOI Rules of Behavior. A Privacy Impact Assessment was completed on the PACS system to ensure that Privacy Act requirements are met and appropriate privacy controls were implemented to safeguard personally identifiable information.

RECORD ACCESS PROCEDURES:

An individual requesting records on himself or herself should send a signed, written inquiry to the applicable System Manager as identified above. The request must include the requester's bureau and office affiliation and the address of the facility to which the requester needed access to facilitate location of the applicable records. The request envelope and letter should both be clearly marked "PRIVACY ACT REQUEST FOR ACCESS." A request for access must meet the requirements of 43 CFR 2.238.

CONTESTING RECORD PROCEDURES:

An individual requesting corrections or the removal of material from his or her records should send a signed, written request to the applicable System Manager as identified above. The request must include the requester's bureau and office affiliation and the address of the facility to which the requester needed access to facilitate location of the applicable records. A request for corrections or removal must meet the requirements of 43 CFR 2.246.

NOTIFICATION PROCEDURE:

An individual requesting notification of the existence of records on himself or herself should send a signed, written inquiry to the applicable System Manager as identified above. The request must include the requester's bureau and office affiliation and the address of the facility to which the requester needed access to facilitate location of the applicable records. The request envelope and letter should both be clearly marked "PRIVACY ACT INQUIRY." A request for notification must meet the requirements of 43 CFR 2.235.

EXEMPTIONS PROMULGATED FOR THE SYSTEM:

This system contains investigatory records related to law enforcement and counterintelligence activities that are exempt from certain provisions of the Privacy Act, 5 U.S.C. 552a(k)(2), (k)(3), and (k)(5). Pursuant to the Privacy Act, 5 U.S.C. 552a(k)(2), (k)(3), and (k)(5), the Department of the Interior has exempted portions of this system from the following subsections of the Privacy Act: (c)(3), (d), (e)(1), (e)(4)(G) through (e)(4)(I), and (f). In accordance with 5 U.S.C. 553(b), (c) and (e), the Department of the Interior has promulgated rules at 43 CFR Part 2, Subpart K, and is proposing to amend these rules in a Notice of Proposed Rulemaking, which was published separately in today's **Federal Register**.

HISTORY:

72 FR 11043 (March 12, 2007).

Teri Barnett,

Departmental Privacy Officer, Department of the Interior.

[FR Doc. 2020–00355 Filed 1–17–20; 8:45 am]

BILLING CODE 4334–63–P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[20XL.LLWO220000.L10200000.PK0000]

Notice of Intent To Prepare an Environmental Impact Statement for the Proposed Revision of Grazing Regulations for Public Lands

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of intent.

SUMMARY: In compliance with the National Environmental Policy Act of 1969, as amended (NEPA), and the Federal Land Policy and Management Act of 1976, as amended (FLPMA), the Bureau of Land Management's (BLM) Resources and Planning Directorate, located in Washington, DC, by this notice is announcing the beginning of the scoping process to solicit public comments and identify issues. Scoping is the process by which the BLM solicits input on the issues, impacts, and potential alternatives and the extent to which those issues and impacts will be analyzed in the Environmental Impact Statement (EIS).

DATES: This notice initiates the public scoping process. Comments on issues may be submitted in writing until 15 days after the last public meeting. The date(s) and location(s) of scoping meetings will be announced at least 7 days in advance through local media, newspapers and the BLM website at: <https://go.usa.gov/xyMqb>. In order to be included in the Draft EIS, all comments must be received prior to 15 days after the last public meeting. The BLM will provide additional opportunities for public participation upon publication of the Draft EIS.

ADDRESSES: You may submit comments related to scoping for the BLM Grazing Regulation Revision EIS to the following weblink: <https://go.usa.gov/xyMqb>. Documents pertinent to this proposal may also be examined at this same weblink.

If you do not have web access and wish to submit a written comment, you may mail it to the Bureau of Land Management, Attn: Seth Flanigan, 3948 S Development Ave., Boise, ID 83702.

FOR FURTHER INFORMATION CONTACT: Seth Flanigan, Project Manager, telephone 208–384–3450; email: blm_wo_grazing_email@blm.gov. If you do not have web access, please contact Mr. Flanigan for help in obtaining copies of documents that are pertinent to this proposal. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Relay Service (FRS) at 1–800–

877–8339 to contact Mr. Flanigan during normal business hours. The FRS is available 24 hours a day, 7 days a week, to leave a message or question. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: The BLM is soliciting public comment as it prepares this EIS to update the Code of Federal Regulations (CFR), at 43 CFR part 4100, Grazing Administration—Exclusive of Alaska. As part of the proposed changes, the BLM may consider moving and revising some provisions contained in 43 CFR part 4100 to other regulations as part of a single rulemaking effort. The EIS will analyze the environmental effects of proposed changes to these regulations.

The BLM grazing regulations (43 CFR part 4100) govern all public lands, excluding Alaska, that have been identified as suitable for livestock grazing. These lands presently include approximately 155 million acres in the western United States. These regulations were promulgated in accordance with FLPMA (43 U.S.C. 1701 *et seq.*), the Taylor Grazing Act (TGA) (43 U.S.C. 315, 315a–315r), and the Public Rangelands Improvement Act (43 U.S.C. 1901 *et seq.*).

Since the first adoption of grazing regulations after passage of the TGA, the BLM has periodically modified, revised, and updated its regulations in response to legislative and policy changes and implementation challenges. The BLM comprehensively revised its grazing regulations in 1995 and 2006. In 2007, the U.S. District Court in Idaho permanently enjoined implementation of the 2006 amendments. The U.S. Court of Appeals for the Ninth Circuit affirmed the permanent injunction in 2011.

The BLM has managed public land livestock grazing activities in conformance with the regulations that were in effect immediately before the 2006 amendments were adopted (October 1, 2005 edition of 43 CFR part 4100), except for the conservation use permit provision previously struck down by the U.S. Court of Appeals for the Tenth Circuit in 1999. The 1995 regulations without the provision for conservation use permits have never been published in the CFR. Despite the injunction, the 2006 amended version of the grazing administration regulations still appears in the CFR. This has created significant confusion for grazing permittees and lessees, BLM staff, the public, and the courts.

On December 19, 2014, Congress amended section 402 of FLPMA (43 U.S.C. 1752), in Public Law 133–291.

Amendments to section 402(c) provide that the terms and conditions of an expired permit or lease shall continue under a new permit or lease until the Secretary completes any remaining applicable environmental review and documentation. This amendment to section 402(c) is similar to provisions in previous appropriations riders.¹ Amendments to section 402(h) authorize the Secretary to categorically exclude decisions that authorize certain grazing permits and leases, and the trailing and crossing of livestock across public land, from the requirement to prepare an environmental document under NEPA. Lastly, new section 402(i) provided Congressional direction regarding the priority and timing for completion of environmental analyses.

In addition, the U.S. Government Accountability Office (GAO) released a report in July 2016 titled, “Unauthorized Grazing: Actions Needed to Improve Tracking and Deterrence Efforts” (GAO–16–559). The GAO recommended that the Secretary of the Interior direct the Director of the BLM to amend the regulations on unauthorized grazing use, 43 CFR subpart 4150 (2005), “to establish a procedure for the informal resolution of violations at the local level.”

The BLM plans to initiate a rulemaking to address the Congressional amendments and the GAO’s concerns, as well as ensure that the CFR reflects the applicable regulations governing the grazing program in the continental United States. In addition, the BLM is interested in amending 43 CFR part 4100 to address the following:

- Updating and modernizing the regulations, including revising definitions to provide more accurate and concise descriptions of the terms, and to align with current statutory, and regulatory authorities; rewording certain sections to improve readability and understanding; and considering ways to improve grazing permit administration, such as: Transfers of grazing preference; provisions that allow for greater flexibility for using livestock grazing to address fuel loads and protect areas with high quality habitat from wildfire; continued Resource Advisory Committee review of rangeland improvements and allotment management plans; and emergency public consultation.

¹ E.g., Sec. 123, Public Law 106–113 (Nov. 29, 1999); Sec. 116, Public Law 106–291 (Oct. 11, 2000); Sec. 114, Public Law 107–67 (Nov. 12, 2001); Sec. 325, Public Law 108–108 (Nov. 10, 2003); Sec. 426, Public Law 111–8 (Mar. 11, 2009); Sec. 416, Public Law 111–88 (Oct. 30, 2009); Sec. 415, Public Law 112–74 (Dec. 23, 2011); Sec. 411, Public Law 113–76 (Jan. 17, 2014).

- Improving permitting efficiency. This could include, for example, changing how the BLM issues decisions for crossing permits, temporary nonrenewable permits, and authorizing grazing to reduce wildfire risk, expanded or clarified use of NEPA categorical exclusion authorities, and streamlining protest and appeal processes.

- Promoting land health. Considering where and how the BLM will evaluate the Land Health Fundamentals and Standards. Explore ways to use livestock grazing to reduce wildfire risk and improve rangeland conditions.

- Public participation. The BLM seeks to ensure adequate participation of all stakeholders without unduly burdening administrative processes.

The purpose of the public-scoping process is to determine relevant issues that will influence the scope of the EIS, including alternatives, and guide the process for developing the EIS.

The BLM is also seeking the views of the public on the potential for prospective regulatory changes to affect historic properties. The information about historic and cultural resources will assist the BLM in identifying and evaluating impacts to such resources and determine the agency’s obligations under Section 106 of the National Historic Preservation Act (54 U.S.C. 306108).

The BLM will consult with Indian tribes on a government-to-government basis in accordance with Executive Order 13175, BLM MS 1780, and other Departmental policies. Tribal concerns, including impacts on Indian trust assets and potential impacts to cultural resources, will be given due consideration. Federal, State, and local agencies, along with tribes and other stakeholders that may be interested in or affected by the proposed BLM Grazing Regulation Revision that the BLM is evaluating, are invited to participate in the scoping process and, if eligible, may request or be requested by the BLM to participate in the development of the EIS as a cooperating agency.

Before including your address, phone number, email address, or other personal identifying information in your comment, you should be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee that we will be able to do so.

Authority: 40 CFR 1501.7.

June E. Shoemaker,
Acting Assistant Director for Resources and Planning.

[FR Doc. 2020-00849 Filed 1-17-20; 8:45 am]

BILLING CODE 4310-84-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLORL00000.L10200000.XZ0000.
LXSSH1050000.20X.HAG 20-0024]

Notice of Public Meetings for the Southeast Oregon Resource Advisory Council

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of public meetings.

SUMMARY: In accordance with the Federal Land Policy and Management Act of 1976 and the Federal Advisory Committee Act of 1972, the U.S. Department of the Interior, Bureau of Land Management's (BLM) Southeast Oregon Resource Advisory Council (RAC) will meet as indicated below.

DATES: The Southeast Oregon RAC will meet February 12–13, 2020, at 1 p.m. Pacific Time on Wednesday, February 12th and 8 a.m. on Thursday, February 13th; and April 22–23, 2020, at 1 p.m. Mountain Time on Wednesday, April 22nd, and 8 a.m. on Thursday, April 23rd. A public comment period will be held on the second day of each meeting (Feb. 13th and Apr. 23rd).

ADDRESSES: The February 12–13, 2020 meetings will be held at the Harney County Community Center, 478 N Broadway, Burns, Oregon; and the April 22–23, 2020 meetings will be held at the Ontario Community Library, 388 SW 2nd Ave., Ontario, Oregon.

FOR FURTHER INFORMATION CONTACT:

Larisa Bogardus, Public Affairs Officer, 3100 H St., Baker City, Oregon 97814; 541-219-6863; lbogardus@blm.gov. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Relay Service (FRS) at 1(800) 877-8339 to contact the above individual during normal business hours. The FRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: The Southeast Oregon RAC is chartered and the 15-members are appointed by the Secretary of the Interior. Their diverse perspectives are represented in commodity, conservation, and general interests. The Council serves in an

advisory capacity to the BLM and U.S. Forest Service officials concerning the planning and management of the public land and national forest resources located, in whole or part, within the boundaries of BLM's Vale Field Office of the Vale District, the Burns District, and the Lakeview District, and the Fremont-Winema and Malheur National Forests. All meetings are open to the public in their entirety. Information to be distributed to the RAC is requested before the start of each meeting.

Agenda items include updates regarding the Southeast Oregon and Lakeview Resource Management Plan Amendment processes; management of energy and minerals, timber, rangeland and grazing, commercial and dispersed recreation, wildland fire and fuels, and wild horses and burros; review and/or recommendations regarding proposed actions by Burns, Vale, or Lakeview BLM Districts; and any other business that may reasonably come before the RAC. A final agenda will be posted online at <https://www.blm.gov/get-involved/resource-advisory-council/near-you/oregon-washington/southeast-oregon-rac> at least one week before the meetings. Comments can be mailed to: BLM Lakeview District; Attn. Todd Forbes; 3050 NE 3rd Street; Lakeview, OR 97630.

Before including your address, phone number, email address, or other personal identifying information in your comments, please be aware that your entire comment—including your personal identifying information—may be made publicly available at any time. While you can ask us in your comment to withhold your personal identifying information from public review, we cannot guarantee we will be able to do so.

Authority: 43 CFR 1784.4-2.

Todd Forbes,

Lakeview District Manager.

[FR Doc. 2020-00852 Filed 1-17-20; 8:45 am]

BILLING CODE 4310-33-P

DEPARTMENT OF THE INTERIOR

Bureau of Land Management

[LLCON05000L71220000EU0000
LVTF180290018XCOC-78815]

Notice of Realty Action: Segregation of Public Land for Proposed Sale in Rio Blanco and Garfield Counties, CO

AGENCY: Bureau of Land Management, Interior.

ACTION: Notice of realty action.

SUMMARY: The Bureau of Land Management (BLM) is proposing to segregate six parcels of public land, totaling 400 acres, from all forms of appropriation under the public land laws, including the mining laws. During the segregation period, the BLM will evaluate the parcels to determine if they are suitable to offer for sale.

DATES: The segregation will terminate upon issuance of a patent, publication of the segregation's termination in the **Federal Register**, or on January 21, 2022, unless extended by the BLM Colorado State Director.

Submit comments concerning the segregation and any part of this notice, by March 6, 2020. The BLM will only accept written comments.

ADDRESSES: Submit written comments to BLM White River Field Office, Field Manager, 220 East Market Street, Meeker, CO 81641. Written comments may also be submitted via email to blm_co_wrfo_sale@blm.gov.

FOR FURTHER INFORMATION CONTACT:

Heather Sauls, Planning and Environmental Coordinator, BLM White River Field Office, phone: 970-878-3855, email: hsauls@blm.gov. Persons who use a telecommunications device for the deaf (TDD) may call the Federal Relay Service (FRS) at 1-800-877-8339 to contact the above individual during normal business hours. The FRS is available 24 hours a day, 7 days a week, to leave a message or question with the above individual. You will receive a reply during normal business hours.

SUPPLEMENTARY INFORMATION: The White River Lodge nominated the parcels for the sale. Two of the parcels, which are completely surrounded by private land owned by White River Lodge, would be offered through a direct sale to the lodge. The remaining four parcels would be offered through a modified competitive sale in which bidders are limited to adjacent landowners with legal access, which includes the White River Lodge.

The following described public lands in Rio Blanco and Garfield Counties are segregated immediately upon publication of this notice:

Parcel 1

Sixth Principal Meridian, Colorado

T. 2 N., R. 94 W.,
Sec. 29, NE1/4NE1/4.

The area described contains 40 acres.

Parcel 2

Sixth Principal Meridian, Colorado

T. 3 S., R. 94 W.,
Sec. 22, SE1/4NE1/4;
Sec. 23, S1/2NW1/4 and NE1/4SW1/4.

The areas described aggregate 160 acres.

Appendix B

Public Scoping Meeting Summaries

**BLM Grazing Scoping Meetings
Preliminary Scoping Report**

**Meeting Location:
Casper Events Center
1 Events Drive
Casper, WY 82601**

**02/20/2019
4:00 PM – 7:30 PM¹**

As part of the Bureau of Land Management's (BLM) effort to solicit public comment on the preparation of an environmental document under the National Environmental Policy Act (NEPA), prior to an amendment to the grazing regulations for public lands, 43 CFR Part 4100, the BLM is holding a series of four public scoping open houses. The open house meetings were announced with the publication of the Notice of Intent to Prepare an Environmental Impact Statement (EIS) for the Proposed Revision of Grazing Regulations for Public Lands on January 21, 2020.

This Preliminary Scoping Report is designed to document and convey the attendance, themes, and comments, voiced by attendees at the February 20, 2020 meeting in Casper, WY. This document does not summarize comments submitted at other times during the scoping period, nor does it include comments submitted through the ePlanning portal during the meeting.

Meeting Structure

The Casper meeting was held at the Casper Events Center and was designed in an open house structure. The meeting was organized into five major stations: Updating and Modernizing Regulations, Improving Permitting Efficiency, Opportunities for Involvement, Promoting Land Health, and Providing Comment. A full set of meeting materials and posters used at the stations can be found in [Appendix A](#). Along with BLM initiated and organized outreach and communications, the meeting was advertised in the *Casper Star Tribune* on February 13. The open house ran for three and a half hours.

In total, 180 persons attended the meeting, as tallied by project staff counting attendees as they entered the meeting venue.² All participants were asked (but not required) to register before entering the meeting.

Meeting attendees were provided two avenues for submitting comments during the meetings. First, participants were provided access to computers where they could submit their digital comments through the ePlanning portal used throughout the scoping process. These comments are not included as part of this analysis. Second, attendees were provided access to written

¹ Meeting was originally scheduled to begin at 4:30 PM. Because a significant number of attendees began arriving to the meeting ahead of the scheduled meeting start, the meeting space was opened to the public at 4:00 PM.

² These numbers were tracked by manual count at the meeting registration table and the number represents the minimum number of attendees participating in the meeting. Additional attendees may have entered the meeting space while staff tending to the reservation table were actively engaged with other members of the public.

comment cards that could be submitted via comment box within the meeting space.³ This Preliminary Scoping Meeting Report includes thematic summary of written comments below. In total, nine written comments were submitted for consideration via the comment box.

Themes⁴

Several themes and consistent topics emerged from hand-written comments submitted during the scoping meeting. Themes were identified by categorizing topics mentioned across multiple comments. The frequency by which these themes were mentioned ranged from one to four comments. Several comments discussed multiple topics on a single comment card.

Theme	Frequency	Additional Notes
Allotment Ownership and Permittee Rights	4	Includes comments about limiting BLM authority to oversee surface uses and facilitating more efficient generational transition of leases (within families).
Land Improvements	3	Includes comments about water developments, silting of reservoirs, and allowing for permittee repairs.
Fire Control	3	Includes comments about earlier dates for grazing to assist in fire reduction and timber management on allotments.
Invasive Species	3	Includes comments requesting additional funds for addressing invasive/noxious species and better coordination with conservation districts.
AUM Calculations	2	Includes comments about the need to recalculate horse grazing AUMs and sheep to cattle exchanges.
Length of Permit	2	Including request for 10-year leases and indefinite leases.
Wild Horses	1	Includes comments indicating wild horse populations are too high.

The submitted written comments have been typed and digitized and can be found in [Appendix B](#).

³ Attendees were also encouraged to take the pre-printed comment cards with them from the meeting, to be mailed to the BLM at a later date. Participants were also informed of the option for submitting comments through the ePlanning page at any point during the comment period.

⁴ Additional themes discussed at stations but not reflected in hand-written comments submitted during the meeting included: the timeline and process for regulation revisions, whether revisions are needed, and differences between the current process and the 2006 revision process.

APPENDIX A: Meeting Materials

Welcome Station – Documents here provide an overview for the public about BLM's interest and process for revising the grazing regulations.

Materials:

- [Welcome Poster and Start Here](#)
- [Notice of Intent to prepare an Environmental Impact Statement](#)

Station 1 - Updating and Modernizing Regulations – Documents from this station explain the current status of grazing regulations and clarify aspects of the regulations in need of update.

Materials:

- [Map of Grazing Allotments](#) (Poster)
- [Grazing Program Factsheet](#)
- [History of the Livestock Grazing Regulations](#)
- [Grazing Regulations 43 CFR 4100](#)

Station 2 - Improving Permitting Efficiency – This station and the included documents address permit processing and opportunities for streamlined administration.

Materials:

- [Permit Processing](#)
- [Talking Points](#)
- [Permitting Efficiency](#)

Station 3 - Opportunities for Involvement – The BLM works to ensure impactful participation from stakeholders. Materials from this station focus on building collaborative flexibility with stakeholders.

Materials:

- [Outcome Based Grazing Factsheet](#)
- [Targeted Grazing Factsheet](#)
- [Unauthorized Grazing Use Flowchart](#)

Station 4 - Promoting Land Health – The materials at this table explain more about the history of land health standards and its inclusion within the current within livestock grazing regulations. The station and materials sought to provoke ideas to encourage feedback on revising the grazing regulations so that a single use is not held solely responsible for achieving land health.

Materials:

- [Land Health - An Overview and How to Participate](#)
- [Why is Land Health Important Posters](#) (Poster)
- [Land Health Evaluations](#) (Poster)
- [Examples of Land Health Standards Montana and Dakotas](#)

Station 5 - Commenting – At this station, members of the public were provided opportunity to submit written or electronic comments.

Materials:

- [Scoping Guide](#)
- [Commenting on BLM Grazing Regulation Updates](#) (Poster)
- [Printable Comment Form](#)

APPENDIX B: Written Comments

#	Location	Meeting Date	Affiliation	Name	Organization	Street Address	City/ State/ Zip	Email	Comment
1	Casper	2/20	Individual	Mark Rosenbaum	Rozenbaum Livestock LLC			rosenbaum56@hotmail.com	<p>As a Livestock Producer I feel the system that is in place works.</p> <p>Would like to see 10-year lease not 3-year with the leaser being to sub lease without all the paperwork.</p> <p>Stock trails in the 33-mile trail is under grazed and a fire hazard. Earlier dates for grazing would help this and reduce fire danger.</p> <p>More resource put to water development would improve range health and spread livestock and wildlife.</p>
2	Casper	2/20	Private Organization	Tom Chant	Chant Ranches LLC.	P.O. Box 508	Baggs, WY 82321		<p>Our Grazing allotments are overrun with Feral horses (300% over AML). The overpopulation is putting direct strain on our resources as well as adverse impacts on the horses.</p> <p>Why is there no accountability for mismanagement of our lands?</p>
3	Casper	2/20	Individual	Ron Lucas		62 Little Wind River BLM Road	Arapahoe, WY 82510		<p>On our range we have an overpopulation of (horses). The stalking rates are way over the AUMs for horse grazing. Range health would be much better if AUMs were at the correct level. Reservoirs on the range that are BLM's have silted in and caused much erosion. Sometime, if it were permitted, individuals could help by repairing them and have a cost effective solution.</p>
4	Casper	2/20	Private Organization	Angus McIntosh	Range Allotment Owners Association			amcintosh2@yahoo.com	<p>Typed comments attached.</p> <p>Policy Position on Livestock Grazing within USFS Forest Districts and DOI Grazing Districts West of the 100th Meridian; and the proper relationship with government regulatory agencies.</p> <p>The Range Allotment Owner's Association, as an affiliate organization with RCalf-USA, submits the following policy position on livestock grazing within Forest Districts Grazing Districts and other federally designated or reserved areas West of the 100th Meridian.</p> <p>"Whereas: Following the United States acquisition of the Western Territories in the mid 1800's, Congress encouraged settlement of the West by stockraisers through the enactment of 'legislative grant' statutes that recognized and validated rancher's property rights to the surface of their stock-ranges established under State or Territorial law or custom on 'mineral lands'. Beginning with the Survey Act of 1853, Congress granted the "right occupation and cultivation" to stockraisers on or near the mineral lands of the West. This split-estate policy was continued by Congress through specific statutes thereafter that granted rights: of ownership based on State or territorial property law (1864, 1865, 1870, 1873, 1872, 1880), of occupation and improvement to the surface (1872, 1874), to the grazing, grass and trees (1875), to water for stockwatering and irrigation (1866/1870/1877), to construct improvements (1866, 1872, 1873, 1874, 1885), to the surface title (1872, 1880, 1884, 1885), and ultimately the government's title to the surface by the Validation Act of 1890."</p> <p>"Whereas: These 'legislative grants' were the highest evidence of rights or title (<u>Whitney v Morrow</u>, 1885), and all that remained for the administrative officers to do thereafter was survey the boundaries of the claim and record the survey maps (<u>Shaw v Kellogg</u>, 1897). The Congress reserved: the mineral estate (vein, lode, ledge or deposit) for separate disposal, the timber for local settlers and residents, certain reservoir sites for irrigation (and secondarily hydro-power sites), and easements for irrigation works (<u>United States v New Mexico</u>, 1978). The 1866 Mineral Land Act opened all 'mineral land' to split estate disposal. However, the 1872 Mineral Land Act applied the split estate policy to all land owned by the United States, and this split-estate 'mineral land' policy was incorporated into all the 'agricultural' land laws between 1910 and 1916 (<u>Kinney Coastal Oil v Kieffer</u>, 1928 and <u>Watt v Western Nuclear</u>, 1983)."</p> <p>"Whereas: Following the Grazing Rights Act of 1875, land that had been occupied, settled, claimed, and had stockwater and other improvements made as a stock-range or stock-grazing ranch, was no longer unoccupied 'public land' (<u>Atherton v Fowler</u>, 1877, <u>Hosmer v Wallace</u>, 1878, <u>Basey v Gallagher</u>, 1879, <u>Nickals v Winn</u>, (NV) 1882, <u>Griffith v Godey</u>, 1885, <u>Dodge v Jones</u>, (MT) 1887, <u>Webber v Clarke</u>, (CA) 1887, <u>Comm Natl Bank of Ogden v Davidson</u>, (OR) 1889, <u>Cameron v United States</u>, 1893, <u>Grayson v Lynch</u>, 1896, <u>Salina Stock Co v Salina Creek Irrigation Co</u>, 1896, <u>Ward v Sherman</u>, 1904, <u>Bacon v Walker</u>, 1907, <u>Curtin v Benson</u>, 1911)."</p> <p>"Whereas:</p>

#	Location	Meeting Date	Affiliation	Name	Organization	Street Address	City/ State/ Zip	Email	Comment
									<p>The Enclosures Act of 1885 had authorized all stockraisers to enclose their ranges if they had a '<i>claim or color of title made or acquired in good faith, or an asserted right ... by or under claim, made in good faith with a view to entry thereof at the proper land office under the general land laws of the United States</i>', (Webber v Clark, (CA) 1887, Cameron v United States, 1893, Menotti v Dillon, 1897, Curtin v Benson, 1911)." "The Survey Act of 1897 (aka Forest Organic Act), authorized the Secretary of Interior to 'permit the use of timber and stone' in Forest Reserves. This is in keeping with the split estate condition of Forest Reserves where the United States reserved 'commercial timber' and 'mineral deposits in the land'. No mention is made of 'grazing permits' in any of the enabling legislation for Forest Reserves. However, Congress did allow for land owners (allotment owners) to enter into 'cooperative agreements' for the purpose of constructing 'range improvements' and to cooperate with 'range investigations' (Act of June 30, 1914, 38 Stat 430). Similar language was included in the Taylor Grazing Act of 1934, providing authority for the Secretary of Interior to inter into 'cooperative agreements' with 'owners of grazing rights'. Likewise, the Secretary was authorized to issue 'permits' to regulate the use of 'public lands' (namely commercial timber and minerals). This split estate definition of 'public lands' is supported by the Federal Power Act of 1920 that defines 'public land' as 'land <i>and interests in land</i>'. After the 1890 Validation Act ranchers were the surface owner of their range allotments, and the only 'public land' within those allotments were the mineral, commercial timber, easements for irrigation works and for access to the reserved minerals and commercial timber." "All limitations, restrictions and conditions within 'cooperative permit agreements' or other documents are limited to the regulation of the government's reserved minerals, commercial timber, irrigation reservoirs and related easements. Any conditions or restrictions that go beyond regulations related to commercial timber harvest, irrigation reservoirs or mining activities are inapplicable to Allotment Owners. This interpretation of the law is directly supported by the National Forest Management Act (NFMA) Section 6 (i) that specifically says 'all permits, contracts and other instruments ...shall be subject to valid existing rights'. Also, the Federal Land Policy Management Act (FLPMA) Title VII says 'All actions by the Secretary concerned shall be subject to valid existing rights'."</p> <p>"Therefore: The Range Allotment Owners propose that all federal regulations related to livestock grazing within Forest Districts or Grazing Districts (or any other federal reservations established after 1875) follow these guidelines;</p> <ol style="list-style-type: none">1. All 'permits for grazing' shall be solely limited to ensuring that Allotment Owners are not engaged in 'commercial timber harvest' or 'mineral activities' without complying with the lawful requirements related to mining and commercial timber harvest. This shall not be construed to affect the right of Allotment owners to make use of all timber, wood, or common variety stone, or coal for personal use as provided in existing law.2. Where Allotment Owners choose to enter into 'cooperative agreements' to cost-share on improvements and range studies, investigations or management plans, it shall be stated plainly that those 'permits contracts and other instruments' are subject to valid existing rights and that all other activities are subordinate and secondary to the Allotment Owner's surface property rights for stockraising. Additionally, no land, water, improvements, forage or other property interests of the surface Allotment Owner shall be infringed on in any way without due process, just compensation and consent of the State Legislature as required by law and the Constitution Amendment 5.3. Where the Allotment Owners choose not to enter into 'cooperative agreements' with the USDA or DOI, federal employees shall be demoted, fired or otherwise punished (under Title 18 USC section 241) and held accountable for harassing Allotment Owners or encouraging trespassers to destroy, steal or otherwise violate the property rights of Allotment Owners."<p>Signed by Executive Director of the Range Allotment Owner's Association</p><p>Angus McIntosh, PhD</p><p>Signed by Counsel for Range Allotment Owner's Association</p><p>Hayden Ballard, JD</p>
5	Casper	2/20	Private Organization	Karson Shepperson	KS Ranch	26750 Ranch Rd.	Casper, WY 82601		<ol style="list-style-type: none">1. All permits should be kept as they are. Applicants should only be granted that lease if they have deeded land tied to that allotment.2. Range care/health is up to the stewards with normal oversight from Range Con[servation] Specialists.3. Government funds would be better allocated to treatment & prevention of invasive species and & noxious weeds.

BLM Grazing Scoping Meetings – Preliminary Scoping Report – Casper

#	Location	Meeting Date	Affiliation	Name	Organization	Street Address	City/ State/ Zip	Email	Comment
6	Casper	2/20	Private Organization	Karley Spaulding	KS Ranch	40000 Buffalo Creek Rd	Arminto, WY 82630	Karl-shep87@hotmail.com	<p>-Permits shouldn't be available for application unless applicant has deeded land tying to said allotments.</p> <p>-Grazing permits should hold current to the current lessee unless justifiable cause is given to reassess the situation, or the allotment changes hands.</p> <p>-Livestock grazing as a tool to reduce fire risk, increase the health of the land, and grow desirable species.</p> <p>-Allocate more resources to fight off invasive species of noxious weeds. *Cheatgrass *Russian knapweed & Diffuse knapweed</p> <p>-Make it possible to exchange sheep for cattle AUM's in an allotment.</p>
7	Casper	2/20	Individual (no affiliation)	Scott A. Brown	Double Dollar Ranch	823 Lane 142	Lovell, WY	Sog_kidsdaddy@yahoo.com	<p>Please ensure that this update does not result in any decrease to net carrying capacity or a decrease to any ranchers' autonomy in managing his grazing allotment. Rather, decrease BLM involvement in management of split estates lands in the west.</p> <p>Please inform all allotment owners that their ownership interests in their grazing allotments are superior to new regulation or acts because of the "subject to all prior existing rights" clauses.</p>
8	Casper	2/20	Individual (no affiliation)	O.J. Hanson		1145 Mayoworth Rt.	Kaycee, WY 82639		<p>Since 1853, Congress granted rights to stock raisers to right to occupy surface. As time went on the right to tile, excepting minerals and timber, were granted. The most recent legislation (NEPA), reaffirms these rights. Included in these rights is surface owner's rights to timber and some mineral use by the surface owner for their own use, not for sale. There are MANY illegal regulations here [made] by unelected bureaucrats and empire builders within the BLM.</p> <p>The BLM has been very negligent with their duty to manger their timber and the harvest of their minerals, the only legitimate authority of the BLM.</p> <p>Our allotment has too much over-mine timber that the local bureaucrats refuse to harvest in a timely manner. I need this done to save my adjoining timber and the grass from fire. I have been, and continue to, enable this harvest to cooperate if the powers that be would do their job, and protect my rights to surface and improvements.</p> <p>I am quite proud of my improvements on my split estate holdings, all done at my own expense, no cost share expense to taxpayers, as it should be.</p> <p>According to law, these improvements are at the onset of these properties was initially required to hold them.</p> <p>History shows that privately held grazing land is always better for the land then property under government control. A lease of my grazing land that is not assured of continual ownership tends to be used up, anticipating a loss of use to someone else.</p>
9	Casper	2/20		Bruce and James Sedman			Torrington, WY		<p>Comments on Proposed Grazing Regulation Revision 43 CFR Part 4100. Submitted by Bruce and James Sedman, Torrington Wyoming.</p> <ol style="list-style-type: none"> Flexibility should be a key emphasis of any change to grazing regulations. Resources can be more effectively managed and utilized if lease holders have more built in flexibility in their leases and are more closely linked to conditions on the ground. This should help increase soil and resource health, as well as provide for better management of invasive species. For instance, turnout dates should be flexible if cheatgrass and other early season weeds need management. In the long run, this flexibility saves everyone money, time, and resources by being more effective on the ground. Greater effort should be made to include and collaborate with local entities and lease holders to manage pests and invasive species. Often times, the BLM ground in the neighborhood is the source of these problems. Better collaboration with local Weed and Pest and Conservation Districts could lessen the workload of BLM personnel and costs to the agency for managing these problems (before they become large and unmanageable), and help to more efficiently utilize the resources on the ground for all stakeholders, not just grazing lease holders. Changes should be made to facilitate easier (generational) transition to family lease holders, as it should not require extensive legal services to do so. Research has shown that multi-generational farms and ranches are some of the most effective stewards of the land.

This page intentionally left blank.

**BLM Grazing Scoping Meetings
Preliminary Scoping Report**

**Meeting Location:
Elko Convention Center
700 Moreen Way
Elko, NV 89801**

**02/18/2019
4:00 PM – 7:30 PM¹**

As part of the Bureau of Land Management's (BLM) effort to solicit public comment on the preparation of an environmental document under the National Environmental Policy Act (NEPA), prior to an amendment to the grazing regulations for public lands, 43 CFR Part 4100, the BLM is holding a series of four public scoping open houses. The open house meetings were announced with the publication of the Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Revision of Grazing Regulations for Public Lands on January 21, 2020.

This Preliminary Scoping Report is designed to document and convey the attendance, themes, and comments, voiced by attendees at the February 18, 2020 meeting in Elko, NV. This document does not summarize comments submitted at other times during the scoping period, nor does it include comments submitted through the ePlanning portal during the meeting.

Meeting Structure

The Elko meeting was held at the Elko Convention Center and was designed in an open house structure. The meeting was organized into five major stations: Updating and Modernizing Regulations, Improving Permitting Efficiency, Opportunities for Involvement, Promoting Land Health, and Providing Comment. A full set of meeting materials and posters used at the stations can be found in [Appendix A](#). Along with BLM initiated and organized outreach and communications, the meeting was advertised in the *Elko Daily* on February 4, 5, 8, and 12, as well as on the *Elko Daily* website for 20,000 impressions. The open house ran for three and a half hours.

In total, 275 persons attended the meeting, as tallied by project staff counting attendees as they entered the meeting venue.² All participants were asked (but not required) to register before entering the meeting.

Meeting attendees were provided two avenues for submitting comment during the meetings. First, participants were provided access to computers where they could submit their digital comments through the ePlanning portal used throughout the scoping process. These comments

¹ Meeting was originally scheduled to begin at 4:30 PM. Due to the number of attendees queueing to enter the meeting space prior to the planned start time, the meeting space was opened to the public at 4:00 PM.

² These numbers were tracked by manual count at the meeting registration table and the number represents the minimum number of attendees participating in the meeting. Additional attendees may have entered the meeting space while staff tending to the reservation table were actively engaged with other members of the public.

are not included as part of this analysis. Second, attendees were provided access to written comment cards that could be submitted via comment box within the meeting space.³ This Preliminary Scoping Meeting Report includes thematic summary of written comments below. In total, 19 written comments were submitted for consideration via the comment box.

Themes⁴

Several themes and consistent topics emerged from hand-written comments submitted during the scoping meeting. Themes were identified by categorizing topics mentioned across multiple comments. The frequency by which these themes were mentioned ranged from two to eight comments.

Theme	Frequency	Additional Notes
Permit Flexibility	8	Includes comments on the need for additional flexibility in responding to climate and conditions (season grazing), flexibility responding to cheat grass and wildfires. Additional comments included a need for reduced flexibility to ensure proper BLM oversight and analysis.
BLM Staffing	2	Includes comments about issues arising from perceived lack of staffing or staffing turnover in BLM offices.
Range Health	2	Including comments suggesting that continued grazing makes maintaining range and ecosystem health impossible.
Invasive Species	2	Includes comments on ventenata, juniper, and cheat grass control.
Wild Horses	2	Includes comments on the need to reduce wild horse grazing to assist in management of invasive species and protect wild horses from overpopulation.
Opportunities for Greater Coordination	2	Including processes for taking into account rancher opinion and options for reducing confrontations.

The submitted written comments have been typed and digitized and can be found in [Appendix B](#).

³ Attendees were also allowed to take the pre-printed comment cards with them from the meeting, to be mailed to the BLM at a later date. Participants were also informed of the option for submitting comments through the ePlanning page at any point during the comment period.

⁴ Additional themes discussed at stations but not reflected in hand-written comments submitted during the meeting include additional questions about wild horse management and unauthorized use of tribal horses, water rights, lack of clarity about techniques to handle fuels and fires, and targeted grazing.

APPENDIX A: Meeting Materials

Welcome Station – Documents here provide an overview for the public about BLM's interest and process for revising the grazing regulations.

Materials:

- [Welcome Poster and Start Here](#)
- [Notice of Intent to prepare an Environmental Impact Statement](#)

Station 1 - Updating and Modernizing Regulations – Documents from this station explain the current status of grazing regulations and clarify aspects of the regulations in need of update.

Materials:

- [Map of Grazing Allotments](#) (Poster)
- [Grazing Program Factsheet](#)
- [History of the Livestock Grazing Regulations](#)
- [Grazing Regulations 43 CFR 4100](#)

Station 2 - Improving Permitting Efficiency – This station and the included documents address permit processing and opportunities for streamlined administration.

Materials:

- [Permit Processing](#)
- [Talking Points](#)
- [Permitting Efficiency](#)

Station 3 - Opportunities for Involvement – The BLM works to ensure impactful participation from stakeholders. Materials from this station focus on building collaborative flexibility with stakeholders.

Materials:

- [Outcome Based Grazing Factsheet](#)
- [Targeted Grazing Factsheet](#)
- [Unauthorized Grazing Use Flowchart](#)

Station 4 - Promoting Land Health – The materials at this table explain more about the history of land health standards and its inclusion within the current within livestock grazing regulations. The station and materials sought to provoke ideas to encourage feedback on revising the grazing regulations so that a single use is not held solely responsible for achieving land health.

Materials:

- [Land Health - An Overview and How to Participate](#)
- [Why is Land Health Important Posters](#) (Poster)
- [Land Health Evaluations](#) (Poster)
- [Examples of Land Health Standards Montana and Dakotas](#)

Station 5 - Commenting – At this station, members of the public were provided opportunity to submit written or electronic comments.

Materials:

- [Scoping Guide](#)
- [Commenting on BLM Grazing Regulation Updates](#) (Poster)
- [Printable Comment Form](#)

APPENDIX B: Written Comments

#	Location	Meeting Date	Affiliation	Name	Organization	Street Address	City/ State/ Zip	Email	Comment
1	Elko	2/18/20	Federal, State, or Local Government; Elected Representatives	Patsy Waits		727 Globe Court	Austin, NV		BLM needs to change their regulation restrictions on ranchers developing new water sources. Water is needs by all – livestock – wildlife, recreation, [and] ranchers are willing to do this at their expense – but should not have to concede any of their water rights. Healthy land grazing is a priority for [us], but the 3 rd and 4 th etc. generation of these folks bring more experience and wisdom to the table than you folks and you need to work with them not against them. Once we lose a ranch, its gone forever. We can't afford to put any more of them out of business.
2	Elko	2/18/2020	Individual	Joe and Kristi Cumming	Bar C Land and Livestock	HC 30 Box 300	Jiggs, NV 89815	kjcumming@yahoo.com	In Elko, the lack of staffing in our local office is frustrating and a bottleneck for getting projects done during a timely fashion. [I] would like to change or have the ability to tweak our grazing dates and schedules. The revolving door at our local BLM has left us with range [conservationists] that are either nonexistent or spread too thin over our vast state.
3	Elko	2/18/2020	Individual	Pete Mori	Mori Ranches LLC	HC 32 Box 290	Tuscarora, NV 89834	pmori9@hotmail.com	<ul style="list-style-type: none"> - Permits need to have flexibility to have turn out and removal as climate and conditions dictate. This means January 1 – December 31 date on permits. - Must own base property to have a permit. - More local input on decisions made affecting permits. - Permit holder has to have [an] adequate opportunity to affect decisions related to grazing on their allotments.
4	Elko	2/18/20	Individual	Bert Paris		HC 61 Box 140	Battle Mountain, NV 89820	Bert.paris@sbcglobal.net	The way our public lands are managed needs reform. Politics have replaced land management. Let's rely on science and not bias against grazing. Healthy public land needs – flexibility, targeted grazing, and common sense range management. Recognize cheat grass and include it in the stocking rate [and] utilization of our grazing allotments. This will also reduce wildfire. Flexibility on our grazing allotments will see cheat grass replaced by perennial plant – rest from grazing is not land management.
5	Elko	2/18/2020	Individual; Private Organization	Mike Garabedian	Wiseman Ranch Heritage	1725 Shell Beach Dr	Lincoln, NV 95648	michaelgarabedian@earththink.net	The EIS project requires authors that are up to date on the science of grassland carbon sequestration. Range management is a significant factor helping to mitigate climate change. After the proposed drafts comes out, comments on the draft needs for EIS coverage requires another scoping comment period before DEIS is drafted.
6	Elko	2/18/2020	Individual	Jack Payne	NV Livestock MKTG		Fallon, NV		I wish to assert and retain my rights for all interested party in grazing reforms.
7	Elko	2/18/2020	Individual	Neil McQueary		HC 60 Box 677	Ruby Valley, NV 89833	lhm@ctnis.com	Season of Use – NEPA – Shrub control Broaden the areas applicable
8	Elko	2/18/20201	Citizen's Group	Christopher Hawkes	Pleasant View Grazing Association			hhfence@gmail.com	I was told we were going to receive our water rights back that we were required to turn over to the BLM, is this still in the works to be returned? Hard in and hard out dates don't work. It needs to be off available forage when the pasture is ready.
9	Elko	2/18/20220	Individual	Pete Marvel		PO Box 44	Paradise Valley, NV 89426	pmarvelsix@gmail.com	Flexible grazing 1/1 -12/31 when forage is available. We need easier ways to get water developments, pipelines, wells, water troughs etc. Allow for grazing cheat grass. The more cheat grass, the more grazing. No AUMs lost to Elk. Recruit range [conservationists] from local areas so they will stay.
10	Elko	2/18/2020	Private Organization	John Frasor	Wild Horse Ranching Co LLC				I own a 90,000 acre winter grazing permit that is managed by the Battle Mountain District. The season of use is flawed as they want cattle held in small areas of the allotment for short periods of time. There are no fences on the allotment interior and make that impossible. They are using hot season utilization standards on dormant season grazing.
11	Elko	2/18/2020	Individual	John Prier			Spring Ck, NV	jadetreeguy@springcreek.inc	There should be an easier way to protect riparian areas when the stomping and destruction by cattle is obvious.

#	Location	Meeting Date	Affiliation	Name	Organization	Street Address	City/ State/ Zip	Email	Comment
12	Elko	2/18/2020	Citizen's Group	Katie Fite	Wildlands Defense	PO Box 125	Boise, ID 83702	katie@wildlandsdefense.org	<p>BLM must hold more scoping meetings.</p> <p>BLM has biased the process by including a battery of actions that favor rancher commodity exploitation. BLM must analyze rapidly terminating livestock grazing in order to prevent sage-grouse, pygmy rabbit, native fish and other plummeting species extinctions. We strongly oppose:</p> <ul style="list-style-type: none"> - Flexibility - Targeting grazing - Pinyon-Juniper Deforestation - Livestock facility proliferation - Supplement use - Outcome-based grazing - Weakening of the Fundamentals of Rangeland Health (FRH) <p>We strongly support:</p> <ul style="list-style-type: none"> - Planned removal of livestock from sensitive species habitat across BLM lands. <p>Livestock grazing is causing cheat grass and other weeds to proliferate across the west. Lands cannot be effectively restored with continued grazing. BLM regulations must be much more restrictive. BLM must require mandatory measurable use and trampling standard in upland and riparian communities.</p> <p>Penalties for trespass must be much more severe.</p> <p>We strongly oppose streamlining NEPA or other processes. BLM needs to conduct much more detailed and thorough grazing analysis. Grazing permits must only extend for 5 years.</p>
13	Elko	2/18/2020	Individual	Mitch Heguy		713o W Frontage Rd.	Elko, NV	mjheguy@gmail.com	<p>I believe the grazing regulations are badly in need of modernization. Ranchers are on the ground daily and are the first ones to notice changes. Putting the resources first is my priority. Flexibility within the permit is key, being bound by dates within pastures is a hindrance to effective management. Some years when rain comes timely, we get two crops of cheat grass. Being able to stay in the lower pastures to graze it while the upper native grasses grow is a win-win for everyone. Doing the same thing every year and expecting a different outcome is not going to stop the cycle of fire. Flexibility in numbers of cattle could also be useful! The only range management tools I am aware of are grazing, fire, rest. Together, I think we can get into a more effective management mode!</p>

#	Location	Meeting Date	Affiliation	Name	Organization	Street Address	City/ State/ Zip	Email	Comment
14	Elko	2/18/2020	Individual	Micah Wilson	1Z Ranch	14414 Burns Izee Rd	Canyon city, OR 97820	mwilson@izranch.com	<p>Ventenata has become a major issue in the Prineville BLM district. This invasive weed is taking over our native rangelands, destroying sage grouse habitat and limiting grazing.</p> <p>Chemical herbicides seem to be the only moderately effective tool to reduce the impact. The problem is multiplied by the season-long and often year-long grazing of wild horses. We need to mitigate the problem with the use of herbicides on BLM and also developing and maintaining Herb Management Areas (HMAs) and decreasing wild horse numbers drastically.</p> <p>Greater grazing flexibility is needed across BLM grazing grounds.</p> <p>Current practices of some season grazing is leading to a degradation of our rangeland grass resources.</p> <p>Dormant season grazing, targeted grazing and changing season of issue are all tool we can use to improve soil health and increase available forage for livestock and wildlife.</p> <p>Specific, detailed grazing plans could be a help in this area.</p> <p>Juniper Control</p> <p>The juniper is taking over our rangelands of the west. Destroying vital sage grouse habitats, limiting water availability, and decreasing livestock grazing areas as well as wildlife habitat for deer and elk.</p> <p>The BLM needs a detailed and aggressive approach to thinning juniper.</p> <p>Private landowners have taken drastic measures to remove juniper. The BLM should consider looking to private landowners, watershed and other entities that have successful plans to combat invasive juniper.</p> <p>Wildhorse Management</p> <p>The issue of wild horses on the Prineville District is growing.</p> <p>HMA need established and desired numbers need to be maintained. The BML needs to aggressively handle this issue through horse capture, sterilization, and other humane means of reducing numbers.</p> <p>The wild horse is destroying our rangelands. Unlike cattle, deer, and elk; horses seldom leave their home range. Thus, yearlong grazing is occurring in their home ranges. The numbers have reached an unsustainable point, not only for limiting cattle numbers, but also for the health of the wild horse.</p>
15	Elko	2/18/2020	Individual	Jack Prier			Spring Ck, NV	jacktreeguy@springcreak.net	<p>Since the land in question is the wildlife ecosystem, why is the destruction by cattle allowed or encouraged? The pitiful AUM pays but 1/7 [of] the administrative cost, and weeds, rehabilitation, fires, re-seeding, fences, and roads are all a huge public subsidy to a very few people.</p> <p>Since most of the BLM [land] is a desert, why are streams not better protected from trampling by huge domesticated herbivores that evolved in riverine systems and seek that riparian zone?</p> <p>The riparian zones on the public lands must be better protected from livestock trampling.</p>

BLM Grazing Scoping Meetings – Preliminary Scoping Report – Elko

#	Location	Meeting Date	Affiliation	Name	Organization	Street Address	City/ State/ Zip	Email	Comment
16	Elko	2/18/2020	Individual	Shamaria Rodriguez	Rhoads Ranch / Dean and Sharon Rhoads Trust	HC 32 Box 70	Tuscarora NV, 89834	shammyr86@gmail.com	<p>Our permits have early turn outs. Depending on the year, the grass might not be ready at that date. On the other end, there's plenty of feed left at the end of the grazing season. If the season could be extended, it would benefit the range.</p> <p>Our operation has been frustrated from time to time after being burned out in various areas numerous times – some places more than once.</p> <p>We realize and agree range needs to be rested after a fire. However, a wet year often follows a fire a year or two later and feed comes back abundantly. On years like that it would help the range and us if we could graze it when it's appropriate. It would reduce the fuel load and the chance of reburning.</p> <p>Being more flexible in managing after a fire would be beneficial for all.</p> <p>Shamaria Rodriguez</p>
17	Elko	2/18/2020	Individual	Bert and Jill Paris	Paris Ranch	15450 Cottonwood Ranch Rd	Battle Mountain, NV 89820	jillparisfy@icould.com	<ul style="list-style-type: none"> - Our allotment is included in the Augusta Mt. Herb Management Area (HMA) - BLM is obligated by provisions of Sec.1333(a) of the Wild and Free-Roaming Horses and Burros Act of 1971 (WFRHBA) to gather excess horses to achieve and maintain a thriving natural ecological balance on public lands and prevent suffering and death resulting from excess numbers. - Gathering horses is the only sensible solution to the out of control wild horse problem. - We need gathers. Our allotment AML is 20-33 head. As of January 1, 2020, we have approximately 250 wild horses now! - We have been ignored and our business is in jeopardy. Please help us, so we can continue to play a part in feed our nation with beef.
18	Elko	2/18/2020	Individual						<p>I think the process of permit renewals takes too long and could be more efficient. Part of the problem is all the environmental impacts assessments done by BLM employees who have only been there a short time yet act like they know everything. If they could take the ranchers opinions, those who have been on the land every day, it could shorten the timeframe. It also feels like a take, take, take. I don't think the agency should focus on how to "take" away all the time. It is frustrating to try and work with them when you feel like you are constantly on the defense.</p> <p>Ranchers want to improve the land. We want to improve water sources. It helps us to do this. Working together, without silly regulations all the time that don't really apply in our area, I think more could get done. Better land health could be achieved. We are not the enemy here, so it would be great to not be treated that way.</p>
19	Elko	2/18/2020	Individual	Marta Agee		2300 Shadow Land	Sparks, NV 89434		<p>Simplify temporary non renewable and allow rancher to rancher agreements be sufficient to allow fire burned out to make use of surplus feed. Allows good restoration on burned or drought allotments and allow good managements on other allotments.</p> <p>How to avoid many confrontations between ranchers and BLM:</p> <ul style="list-style-type: none"> - 58 years and a good record of getting along and solving and/or preventing animosity. - When BLM personnel are on the allotment we always ask for a family member to ride along. BLM staff can talk with the ranch member and hear what the ranching family see as the good spots on the range, the places that just aren't able to be any better, and the improvements being made. <p>Rancher hears what staff sees and we can prevent problems before they get <u>out of hand</u>.</p> <p>[The] policy should be: BLM staff should always let ranchers know when they will be out on [the] allotment and agree with a ranch family member [riding along].</p>

**BLM Grazing Scoping Meetings
Preliminary Scoping Report**

**Meeting Location:
Ramada Palmas Hotel
1201 East University Avenue
Las Cruces, NM 88005**

**02/11/2020
4:00 PM – 7:30 PM¹**

As part of the Bureau of Land Management's (BLM) effort to solicit public comment on the preparation of an environmental document under the National Environmental Policy Act (NEPA), prior to an amendment to the grazing regulations for public lands, 43 CFR Part 4100, the BLM is holding a series of four public scoping open houses. The open house meetings were announced with the publication of the Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Revision of Grazing Regulations for Public Lands on January 21, 2020.

This Preliminary Scoping Report is designed to document and convey the attendance, themes, and comments, voiced by attendees at the February 11, 2020 meeting in Las Cruces, NM. This document does not summarize comments submitted at other times during the scoping period, nor does it include comments submitted through the ePlanning portal during the meeting.

Meeting Structure

The Las Cruces meeting was held at the Ramada Palmas Hotel and was designed in an open house structure. The meeting was organized into five major stations: Updating and Modernizing Regulations, Improving Permitting Efficiency, Opportunities for Involvement, Promoting Land Health, and Providing Comment. A full set of meeting materials and posters used at the stations can be found in [Appendix A](#). Along with BLM initiated and organized outreach and communications, the meeting was advertised in the *Las Cruces Sun-News* on February 4th. The open house ran for three and a half hours.

In total, 250 persons attended the meeting, as tallied by project staff counting attendees as they entered the meeting venue.² All participants were asked (but not required) to register before entering the meeting.

Meeting attendees were provided two avenues for submitting comment during the meetings. First, participants were provided access to computers where they could submit their digital comments through the ePlanning portal used throughout the scoping process. These comments are not included as part of this analysis. Second, attendees were provided access to written

¹ Meeting was originally scheduled to begin at 4:30 PM. Due to the number of attendees queueing to enter the meeting space prior to the planned start time, the meeting space was opened to the public at 4:00 PM.

² These numbers were tracked by manual count at the meeting registration table and the number represents the minimum number of attendees participating in the meeting. Additional attendees may have entered the meeting space while staff tending to the reservation table were actively engaged with other members of the public.

comment cards that could be submitted via comment box within the meeting space.³ This Preliminary Scoping Meeting Report includes thematic summary of written comments below. In total, 16 written comments were submitted for consideration via the comment box.

Themes⁴

Several themes and consistent topics emerged from hand-written comments submitted during the scoping meeting. Themes were identified by categorizing topics mentioned across multiple comments. The frequency by which these themes were mentioned ranged from two to five comments.

Theme	Frequency	Additional Notes
Land Improvements	5	Includes, fence, road repairs, and well improvements.
Wilderness Study Areas	5	Includes comments on the need to release wilderness study areas and to give water access on the study areas.
NEPA Process	4	Includes comments about the NEPA process taking too long and questions around how BLM can shorten the process.
Invasive Species	2	Includes questions about what BLM will do regarding invasive species.
Length of Permit	2	Includes request for 10-year leases, as well as a request to exclude renewal of 10-year leases from NEPA process.
Range Improvement	2	Includes comments about including section 4 range improvement specific permits in the process.

The submitted written comments have been typed and digitized and can be found in [Appendix B](#).

³ Attendees were also allowed to take the pre-printed comment cards with them from the meeting, to be mailed to the BLM at a later date. Participants were also informed of the option for submitting comments through the ePlanning page at any point during the comment period.

⁴ Additional themes discussed at stations but not reflected in hand-written comments submitted during the meeting included flexibility in the grazing authorization process and how to include additional monitoring in the grazing authorization process.

APPENDIX A: Meeting Materials

Welcome Station – Documents here provide an overview for the public about BLM's interest and process for revising the grazing regulations.

Materials:

- [Welcome Poster and Start Here](#)
- [Notice of Intent to prepare an Environmental Impact Statement](#)

Station 1 - Updating and Modernizing Regulations – Documents from this station explain the current status of grazing regulations and clarify aspects of the regulations in need of update.

Materials:

- [Map of Grazing Allotments](#) (Poster)
- [Grazing Program Factsheet](#)
- [History of the Livestock Grazing Regulations](#)
- [Grazing Regulations 43 CFR 4100](#)

Station 2 - Improving Permitting Efficiency – This station and the included documents address permit processing and opportunities for streamlined administration.

Materials:

- [Permit Processing](#)
- [Talking Points](#)
- [Permitting Efficiency](#)

Station 3 - Opportunities for Involvement – The BLM works to ensure impactful participation from stakeholders. Materials from this station focus on building collaborative flexibility with stakeholders.

Materials:

- [Outcome Based Grazing Factsheet](#)
- [Targeted Grazing Factsheet](#)
- [Unauthorized Grazing Use Flowchart](#)

Station 4 - Promoting Land Health – The materials at this table explain more about the history of land health standards and its inclusion within the current within livestock grazing regulations. The station and materials sought to provoke ideas to encourage feedback on revising the grazing regulations so that a single use is not held solely responsible for achieving land health.

Materials:

- [Land Health - An Overview and How to Participate](#)
- [Why is Land Health Important Posters](#) (Poster)
- [Land Health Evaluations](#) (Poster)
- [Examples of Land Health Standards Montana and Dakotas](#)

Station 5 - Commenting – At this station, members of the public were provided opportunity to submit written or electronic comments.

Materials:

- [Scoping Guide](#)
- [Commenting on BLM Grazing Regulation Updates](#) (Poster)
- [Printable Comment Form](#)

APPENDIX B: Written Comments

#	Location	Meeting Date	Affiliation	Name	Organization	Street Address	City/ State/ Zip	Email	Comment
1	Las Cruces	2/11/20	Individual	Susan Hooper		391 Bradfoot Rd. Lordsburg	Lordsburg, NM 88004	dalehooper@gmail.com	Stability- Release the wilderness area. I can't even put water where it would benefit livestock and wildlife. Wolves are a danger to all speeds of ranching and wildlife. Restore permits to [the] original number and trust the rancher in taking care of land. Help with getting rid of grease wood.
2	Las Cruces	2/11/20	Organization	Mark Roeber	Public Lands Council		Paonia CO 81428	mtlamborn@aol.com	I would like to comment on: <ol style="list-style-type: none">1) NEPA takes too long and is such an undertaking, staff begins to use it as an excuse to do nothing. I personally volunteered to try an outcome-based grazing venture and was talked out of it because BLM did not want to undergo another round of NEPA.2) Health standards should be applied to all uses, including wildlife, and then have to continue to challenge [the] paradigm of [the] rest is best. [It has] been proven over and over that in arid climates, disturbance is [a] way to bring grasslands and biodiversity back. [It] <u>has to be equal and flexible</u>.3) Grazing preference - need to continue suspended use not just ignore it. [It has] been seen to give a freebie to Antis as doing away with AUMs. [I] was told by one employee in reissuance of term permit "it is only for 10 [years]" but [the] value of ranch and for disturbance of ground maybe [its] just [the] opposite of trying to restore ground. Again, paradigm of <u>Rest is Best</u>.4) Permitted use – BLM needs [the] ability to be flexible in the term of permitted use to change season of use [numbers] of AUMs etc. to do what is best for resources. Personally, we see continued improvements in our allotments but know it could be faster if not tied to season of use.5) BLM needs to go back to the 3 c's. For resource to flourish, permittees and BLM must engage in careful "consultation, coordination, and cooperation." Some offices still try and follow this and that is where success stories are.6) Mandatory qualifications need to be reinstated. Rural lifestyles and economies are tied to this. Taylor Grazing Act was set up to ensure that local economies relied on people being around the whole [year]. [The] biggest problem with going just to [a] recreation-based economy is [that it is] just seasonal. Ranchers employ and spend money throughout the [year]. Tourists and rec[reation] jobs come and go with the season.
3	Las Cruces	2/11/2020	Individual	Devan Wooddell					I am not a rancher, but I am a hunter. My family and I hunt a lot of BLM land in New Mexico. In your booklet, it states that the primary goal is "for the use and enjoyment" of the people. It is frustrating when private landowners put fencing across public land. This makes it difficult for hunters/horses to cross through BLM land. Some ranchers have the courtesy to put a swing gate to pass through. However, it is only in one spot that causes longer rides and/or hikes to get through. I have come across many fences w/ only cattle guards making it impossible to get horses through. My main concern is the amount of fencing that is on public lands, making it almost impossible for public land users to cross through.
4	Las Cruces	2/11/2020	Individual	Jon Swapp	BLM Permittee	Rt 1 Box 298	Duncan, AZ 85534	bethleenswapp@yahoo.com	I would love to see the NEPA sped up. We have been waiting for over 10 years to get a well developed for a storage tank, drinker, and possible pile line. A mining co[mpany] came in, drilled a test hole (1000 ft), [and] got 300 gal/min. I paid for the casing and they gave me the well. The ranch (allotment) has a well that pumps less than 29pm. The rest of our water is all dirt tanks. Also, we, at one time, were able to run a few saddle horses with our cows. Its sure would be nice to have that option back. Thank you Jon Swapp

BLM Grazing Scoping Meetings – Preliminary Scoping Report – Las Cruces

#	Location	Meeting Date	Affiliation	Name	Organization	Street Address	City/ State/ Zip	Email	Comment
5	Las Cruces	2/11/2020	Individual	Jeff Menges		PO Box 842	Safford, AZ 85548	Mengesjeff9@gmail.com	<ul style="list-style-type: none"> - 10 [years] permits should be categorically excluded from NEPA for renewal. - Section 4 permits for range improvements should be reinstated as states in Sec. 4 TGA. - Standards & Guidelines should be removed and replaced with science-based monitoring. - Range improvement permits should be categorically excluded from NEPAs as soon as cultural clearance is complete. <p>I plan to submit additional, very specific, comments online.</p> <p>Jeff Menges</p>
6	Las Cruces	2/11/2020	Private Organization	Jacob Kerr				Jacobkerr1978@gmail.com	<p>I am very concerned with the permit transfer process and the accountability of the BLM employee Jeseray Bauelt concerning Dona Ana Mts allotment 95007. I bought it one year ago and cannot seem to get this person to help with the transfer. If something does not change, I will be forced to bring legal action against the Las Cruces District Office. I have tried multiple times to find out what is needed to transfer the permit and have received various false information.</p> <p>Thank you</p> <p>Jacob Kerr</p>
7	Las Cruces	2/11/2020	Individual	Jim Ellett		4985 Rio Penaseo Rd	Hope, NM 88250	Jim.ellett@yahoo.com	I think they need to do away with the wilderness study areas.
8	Las Cruces	2/11/2020	Individual	William Gallacher		Box 204	Carrizozo, NM 88301	Wgallachee24@gmail.com	Scale back NEPA regulation in order to bring back common sense to the improvement process on BLM such as pipelines storage tanks, troughs, etc. Allow private companies to do ARC studies before [the] process to start an improvement. Allow ranchers to regulate hunting more.
9	Las Cruces	2/11/2020	Individual	James Taylor		Box 93	Lincoln, NM 88338	Capitan62@q.com	<p>BLM Acquired Land (Non-grazing)</p> <p>Normally permittees are responsible for fences. In a fence-out-state, BLM doesn't repair or maintain fence improvements where there isn't a permit. Funding is needed to maintain the improvements.</p> <p>Wilderness Study Areas</p> <p>There are too many study areas and a reduction of minor areas should be eliminated. A study of proposed wilderness should be reviewed, and guidelines be updated.</p>
10	Las Cruces	2/11/2020	Federal, State, or Local Government	James R. Everage	Otero Soil and Water	217 Wright Well Rd	Pinon, NM 88344	jreverage@gmail.com	<p>Wilderness Study Areas (WSAs) needs to go away.</p> <p>Several years ago, the BLM came out with property not used should be taken away to someone that needs it. Give me a call to visit about this – 575-687-3455.</p>
11	Las Cruces	2/11/2020	Individual	Kari Wade			Animas, NM 88020		<ul style="list-style-type: none"> - Give water access and storage to wilderness area. - Help cost share – hence “land management”. - Hire employees from ranching background. - Too many cutbacks on cattle numbers.
12	Las Cruces	2/11/2020	Individual	John Armstrong	Rancher	Box 311	Mesquite, NM 88048	josh@armstrongequine.com	Rangeland Health is a subjective observation of one point in time that is very subject to human error.
13	Las Cruces	2/11/2020	Individual	Triston Smith	Smith Ranch	Box 47	Caballo, NM 87931	twistee@smithco.com	I appreciate the opportunity for comment. I worked to have permits in southern NM. Both Las Cruces & Socorro offices are really good to work with. I appreciate them very much.
14	Las Cruces	2/11/2020	Individual	Gary Miles		PO Box 724	Placitas, NM 87043	placitasanimal@yahoo.com	What is being done about snake weed?
15	Las Cruces	2/11/2020	Individual						Why would you not use the Law Enforcement Officer (LEO) to issue citations prior to impoundment when owner of livestock has not removed livestock. Seems that a citation might get the owner's attention and would be the less intrusive way to solve the problem. Impoundments are not popular and seldom used to solve the problem. Seems like this would lead to problems of trespass not being resolved.
16	Las Cruces	2/11/2020	Individual	Allen Kasparian					<ol style="list-style-type: none"> 1. Be able to maintain ranch roads <ol style="list-style-type: none"> a. Ex. Humps in Road b. Ex. Using dirt from the pasture 2. Have one-on-one with BLM ranger to get updates and changes to regulations.

**BLM Grazing Scoping Meetings
Preliminary Scoping Report**

**Meeting Location:
Sleep Inn & Suites
1006 S. Haynes Avenue
Miles City, MT 59301**

**02/06/2019
4:00 PM – 7:30 PM¹**

As part of the Bureau of Land Management's (BLM) effort to solicit public comment on the preparation of an environmental document under the National Environmental Policy Act (NEPA), prior to an amendment to the grazing regulations for public lands, 43 CFR Part 4100, the BLM is holding a series of four public scoping open houses. The open house meetings were announced with the publication of the Notice of Intent to Prepare an Environmental Impact Statement (EIS) for the Proposed Revision of Grazing Regulations for Public Lands on January 21, 2020.

This Preliminary Scoping Report is designed to document and convey the attendance, themes, and comments, voiced by attendees at the February 6, 2020 meeting in Miles City, MT. This document does not summarize comments submitted at other times during the scoping period, nor does it include comments submitted through the ePlanning portal during the meeting.

Meeting Structure

The Miles City meeting was held at the Sleep Inn & Suites and was designed in an open house structure. The meeting was organized into five major stations: Updating and Modernizing Regulations, Improving Permitting Efficiency, Opportunities for Involvement, Promoting Land Health, and Providing Comment. A full set of meeting materials and posters used at the stations can be found in [Appendix A](#). Along with BLM initiated and organized outreach and communications, the meeting was advertised in the *Miles City Star* on January 30 and February 2, as well as the *Farm & Ranch Weekly* on January 29 and February 5. The open house ran for three and a half hours.

In total, 200 persons attended the meeting, as tallied by project staff counting attendees as they entered the meeting venue.² All participants were asked (but not required) to register before entering the meeting.

Meeting attendees were provided two avenues for submitting comments during the meetings. First, participants were provided access to computers where they could submit their digital comments through the ePlanning portal used throughout the scoping process. These comments

¹ Meeting was originally scheduled to begin at 4:30 PM. Due to the number of attendees queueing to enter the meeting space prior to the planned start time, the meeting space was opened to the public at 4:00 PM.

² These numbers were tracked by manual count at the meeting registration table and the number represents the minimum number of attendees participating in the meeting. Additional attendees may have entered the meeting space while staff tending to the reservation table were actively engaged with other members of the public.

are not included as part of this analysis. Second, attendees were provided access to written comment cards that could be submitted via comment box within the meeting space.³ This Preliminary Scoping Meeting Report includes thematic summary of written comments below. In total, 10 written comments were submitted for consideration via the comment box.

Themes⁴

Several themes and consistent topics emerged from hand-written comments submitted during the scoping meeting. Themes were identified by categorizing topics mentioned across multiple comments. The frequency by which these themes were mentioned ranged from two to four comments. Several comments discussed multiple topics on a single comment card.

Theme	Frequency	Additional Notes
AUM Calculations (in general)	4	Related to bison as well as yearlings.
- Yearlings (specifically)	3	Primarily related to AUM calculations.
- Bison (specifically)	2	Related to AUM calculation and environmental impact.
Pre-Existing Water Rights	3	One comment specifically requested that BLM conduct an Environmental Impact Study of findings related to pre-existing water rights.
Land Improvements	3	Multiple requests for BLM to work with landowners regarding issues like cross fencing and water pipelines. Another commented that they would like to see less paperwork and shorter timeframes for completing projects.
- Cross Fencing	2	Including comments on allowing permittees to install cross fencing, as well as comments on petitions to remove cross fencing.
Regenerative Grazing	2	Including comments on the need for BLM to consider the benefits of regenerative grazing and encourage its use.
Fire Control	2	Request to provide ranchers additional tools for fire protection.

The submitted written comments have been typed and digitized and can be found in [Appendix B](#).

³ Attendees were also allowed to take the pre-printed comment cards with them from the meeting, to be mailed to the BLM at a later date. Participants were also informed of the option for submitting comments through the ePlanning page at any point during the comment period.

⁴ Additional themes discussed at stations but not reflected in hand-written comments submitted during the meeting included: range impact, sheep, lease transfers, personal clarification, length of permit process, how NEPA figures into grazing regulation revision process, and timeline for implementation of new grazing regulation revisions.

APPENDIX A: Meeting Materials

Welcome Station – Documents here provide an overview for the public about BLM's interest and process for revising the grazing regulations.

Materials:

- [Welcome Poster and Start Here](#)
- [Notice of Intent to prepare an Environmental Impact Statement](#)

Station 1 - Updating and Modernizing Regulations – Documents from this station explain the current status of grazing regulations and clarify aspects of the regulations in need of update.

Materials:

- [Map of Grazing Allotments](#) (Poster)
- [Grazing Program Factsheet](#)
- [History of the Livestock Grazing Regulations](#)
- [Grazing Regulations 43 CFR 4100](#)

Station 2 - Improving Permitting Efficiency – This station and the included documents address permit processing and opportunities for streamlined administration.

Materials:

- [Permit Processing](#)
- [Talking Points](#)
- [Permitting Efficiency](#)

Station 3 - Opportunities for Involvement⁵ – The BLM works to ensure impactful participation from stakeholders. Materials from this station focus on building collaborative flexibility with stakeholders.

Materials:

- [Outcome Based Grazing Factsheet](#)
- [Targeted Grazing Factsheet](#)
- [Unauthorized Grazing Use Flowchart](#)

Station 4 - Promoting Land Health – The materials at this table explain more about the history of land health standards and its inclusion within the current within livestock grazing regulations. The station and materials sought to provoke ideas to encourage feedback on revising the grazing regulations so that a single use is not held solely responsible for achieving land health.

Materials:

- [Land Health - An Overview and How to Participate](#)
- [Why is Land Health Important Posters](#) (Poster)
- [Land Health Evaluations](#) (Poster)

⁵ Stations 2 and 3 placed together during this meeting.

- [Examples of Land Health Standards Montana and Dakotas](#)

Station 5 - Commenting – At this station, members of the public were provided opportunity to submit written or electronic comments.

Materials:

- [Scoping Guide](#)
- [Commenting on BLM Grazing Regulation Updates](#) (Poster)
- [Printable Comment Form](#)

APPENDIX B: Written Comments

#	Location	Meeting Date	Affiliation	Name	Organization	Street Address	City/ State/ Zip	Email	Comment
1	Miles City	2/6/2020	Citizens Group	Chuck Cornillie, Executive Director	Montana Association of Conservation Districts	1101 11 th Avenue	Helena, MT 59601	chuck@macdnet.org	The Montana Association of Conservation Districts opposes APR's petition to remove the cross fencing on any of their BLM allotments. 80 years of range management has taught us that range animals need to be managed, we do not accept the premise that bison are somehow different than cattle. In fairness, APR should have to play by the same rules as everyone else. MACD also has been directed by our membership to oppose BLM's ruling for pre-existing water rights on BLM land. We think this filing runs counter to the doctrine of first use that governs Western water rights and is well established by the courts in Montana and federally. At the very [least] we are requesting that BLM conduct an environmental impact study regarding the impacts of their finding.
2	Miles City	2/6/2020	Individual, Citizens Group	Robert A. Petermann	Petermann Ranch Inc, Wibaux S.C.D.	942 Pine Unit Rd.	Wibaux, MT 59353	Pet7410@midrivers.com	<p>We have two isolated 1/2 of sec of BLM grazing, and on the Petermann Ranch we try to do the best we can to use our grass with a rest, rotation plan so all our pastures get a chance to rest and reseed.</p> <p>Over the years we have had a good relationship with BLM, and I can't see a need to change something that has worked well for years.</p> <p>I hope that any changes you propose are based on proper grazing use by the producers and ranchers, and not by outside pressure from environmental groups with outside money and plans.</p> <p>Now for A.P.I – nearly all of the ranching industry in Montana is concerned over the proposed buffalo commons, proposed and backed by money from all over the world. If you have thoughts of awarding them BLM grazing rights, they must be held to the same AUM restrictions and rules as the cattle ranchers who take care of our land and grass.</p> <p>If you want to see what free roaming buffalo do to a piece of ground, spend a day and tour Theodore Roosevelt Park in N.D. <u>There is nothing left.</u></p>
3	Miles City	2/6/2020	Individual	Adam Courtney		81 Courtney Ln	Alzada, MT 59311	Courtney1@rangeweb.net	BLM needs to make efforts to encourage regenerative grazing practices, paying special attention to land owner needs for water (livestock) and cross fencing. Work with the land owner (rancher) in a reasonable amount of time, and listen to the landowner's requests to make this happen. They have the most experiences on the land. Increase AUM's on land being grazed regeneratively as land improves.
4	Miles City	2/6/2020		Richard Morgan	Rancher – Local & State Grazing District		Alzada, MT 59311		<p>Ease Regulations on Putting Water Pipelines in – Cross Fencing – No changes to Grazing Districts (Local & State)</p> <p>Hold Price's Down – Easier transfer of Leases to Lessees of Ranches</p> <p>Letting Rancher's fight fire with [the] tools [that] they have.</p>
5	Miles City	2/6/2020	Individual	James E. Courtney	Rancher	101 Courtney Lane	Belle Fourche, SD 57717		<p>The Taylor Grazing Act and its purpose should continue to be implemented, not be forgotten or disregarded.</p> <p>Keep BLM commensurate, scattered throughout, so that landowners get a chance at having BLM land. No Blocking of BLM lands. Work with the landowners not against, they care about land deeply!</p>
6	Miles City	2/6/2020	Individual	Tom Courtney	Missouri River Basin St. Coop Grazing District	91 Courtney Lane	Belle Fourche, SD 57717	courtney@rangeweb.net	<p>Would like to make sure BLM stays true to the Taylor Grazing Act.</p> <p>More responsive to weather events when it comes to grazing numbers.</p> <p>Give more attention to regenerative grazing practices.</p> <p>Quicker approval of water pipelines & water storage.</p> <p>Need more engineers employed to facilitate completion of projects.</p>
7	Miles City	2/6/2020	Individual	Kenneth Carlsen		12940 Castlerock rd.	Newell, SD 57760		<p>I Certified mail #70182290000018819463 dated 1-24-2020</p> <p>Yearling cattle are each counted as 1 AUM the same as a cow calf pair, yearlings don't consume as much forage as a cow calf pair so how can you say they are 1 AUM, same as [the] pair</p>
8	Miles City	2/6/2020	Private Organization	Larry J Nelson, V.P.	Moreau Grazing Assn (MGA)	12076 Dillon Rd	Buffalo, SD 57720	ljinranch@sdplains.com	Kenneth Carlson, member of MGA has been notified by certified mail (no. 7018 2290 0000 1881 9963) that on his personal allotment yearling cattle will be counted as an AUM same as a cow calf pair. This is not the way the Society of Range mgmt. calculates this. AUM's are based on the weight of the animals being grazed. To determine what percentage of AUM they are, BLM should be following a nationally recognized, scientifically-based method to determine livestock AUMs.

#	Location	Meeting Date	Affiliation	Name	Organization	Street Address	City/ State/ Zip	Email	Comment
9	Miles City	2/6/2020	Individual	William Stroh	Stroh Farms, Inc.	Bx 217	Jordan, MT 59337	strohbeef@midrivers.com	<p>We are serviced by Miles City office.</p> <p>Why are yearling AUM's the same as cow-calf AUMs? They should be 7/10 AUM if a cow is 1 AUM.</p> <p>How do we go about getting it changed?</p> <p>Bill Stroh 406 557 2538</p>
10	Miles City	2/6/2020		Ron Tibbetts, Chairman	Prairie County Cooperative State Grazing District		Terry, Mt		<p>A range management plan where federal land is intermingled with deeded land and utilized as winter pasture; feed credits should be permitted, as long as rangeland health guidelines are maintained. In these pastures, feeding on federal land should be permitted, especially on previously farmed land.</p> <p>In an allotment, when an owner of deeded commence able property requests running a water pipeline from deeded land onto the federal land in that allotment resulting in better distribution of the water and land use, the requests should be permitted. In this situation, the deeded land owner should retain all the water rights.</p> <p>Haying should be permitted on high fuel load areas (created wheat grass areas, for fire protection).</p> <p>The permitting of range land improvements or repairs to pipeline and such improvements should be done with less paperwork and in a shorter time frame.</p> <p>BLM should not authorize the removal of fences and rangeland improvements on federal land, that were paid for by the government for rangeland management. If authorized the federal government, [the owner] should be reimbursed for the total cost of the improvements at the time it was built.</p> <p>No full year use grazing should be permitted on federal land.</p> <p>The federal government should not hold water rights on federal grazing land, as they cannot show beneficial use. At Statehood, the federal government gave all waters within the state to the state, excluding navigable waters.</p>

Appendix C

Substantive Comments Organized by Process and
Resource Categories

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
National Environmental Policy Act (NEPA)								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gloeckner	Kena				1198	1 National Environmental Policy Act (NEPA)	One of the primary areas of concern to us is the current NEPA process. We feel the process is too restrictive, time-consuming, tedious, and expensive. The fact that we have range improvement projects that are still waiting for approval 30+ years after their introduction and are still operating under a 1992 FMUD speaks for itself. So much time and money are wasted on this process that rangeland health can actually decline as those with the largest stake in the land wait for this long, laborious process to be completed - often times to no avail - in order to facilitate much needed improvements. Often times emergency and immediate management decisions should be implemented (i.e., the grazing of hazardous fire fuels), yet by the time everyone complies with the NEPA process, the window of opportunity is gone. A perfect example is the thousands of acres of valuable habitat lost in Nevada's wildfires. Much of this loss could have been prevented by sound grazing practices implemented at the time of need.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR		1275	23 National Environmental Policy Act (NEPA)	TNC views inadequate funding and capacity as the biggest barrier to effective environmental analysis, which cannot be solved through regulations and needs a more effective and robust consultation with Congress.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry	Williams Coulee Grazing District	MT		961	1 National Environmental Policy Act (NEPA)	Although the District has a reasonably good relationship with BLM Field Offices at this time, better communication is always needed. BLM staff seem to be chronically in a backlog with staff changes, overabundance of paperwork, and mostly frivolous litigation brought about by environmental organizations. Billing and allotment changes are slow to get to the District Secretary which in turn can cause late or erroneous billing to members.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	DeSoto	Randi	Summit Lake Paiute Tribe	NV		883	5 National Environmental Policy Act (NEPA)	Expanding the use of categorical exclusions so as to conduct fewer environmental analyses circumvents the BLM's responsibility to fully and fairly analyze Federal actions on public lands, which would additionally undermine public and Tribal rights to participate in the NEPA processes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy				1411	41 National Environmental Policy Act (NEPA)	the public has the responsibility to review and make recommendations before any decision is made by the BLM and it is my request as well as the responsibility of the BLM to supply the public with adequate and accurate information, scientific research and impartial realistic options. This is the main purpose of this letter and without the BLM's willingness to supply complete, accurate and non-politically driven information and to review all scientific and logical information provided to the agency; any proposed EIS or decision will be illegal.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	6	National Environmental Policy Act (NEPA)	If a district or field office authorizes using temporary non-renewable permits when pre-determined conditions exist on the landscape, these permits can be issued quickly without burdensome additional review. By contrast, added grazing during the growing season, in undisturbed landscapes, or in critical sage-grouse habitat during their season of use are examples of conditions that need high levels of scrutiny and accountability to prevent additional harm and are likely inappropriate for the type of streamlined permitting described here. In either case, the environmental analysis needs to provide transparency by clearly outlining which circumstances would be eligible for programmatic coverage and which would always require a separate environmental analysis and opportunity for the public to review, provide input on and scrutinize alternatives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Slate		UT	1068	1	National Environmental Policy Act (NEPA)	I have asked to do brush treatment and reseedling to prevent soil erosion and increase species class and diversity in areas of the allotment I run cattle on for over 16 years now. I also asked to be allowed to fence spring sources and remove invasive vegetative species from those sources at the same time. I still have never received any indication that these resource protection and improvements have ever been entertained because of the workload and requirements to do any action regardless of its benefits. NEPA and EA/EIS requirements should be flexible to the nature of action.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon			1227	1	National Environmental Policy Act (NEPA)	EIS should not be necessary; I do not believe that a full blown EIS should be necessary for revising regulations, an EA should be sufficient. In any case it should be written on the same timetable as writing the regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	5	National Environmental Policy Act (NEPA)	TNC believes the BLM already possesses the necessary policy mechanisms to deliver this kind of flexibility through ecologically site-specific programmatic environmental analyses at the regional or local level. TNC would like the BLM to provide guidance for Districts to programmatically describe where additional, temporary, and nonrenewable permitted livestock grazing would be appropriate and beneficial. TNC supports identifying situations with high need for flexibility and a low risk of resource damage. Criteria should consider important environmental factors, especially vegetation phenology, ecological resistance to annual grass invasion, resilience to disturbance, current expression of ecological threats, and critical wildlife habitat needs. These programmatic analyses would also offer the opportunity to involve stakeholders in devising and vetting solutions, bringing their vital knowledge and experience to the table to work through issues in advance and avoid conflict when action is needed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Larson	Pat and Larry		OR	1407	4	National Environmental Policy Act (NEPA)	Consider how you will have an effective environmental analysis if the current inventory is not accurate. * The EA/EIS should assess how accurate the data sets are and consider the environmental impacts to the natural resources.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ratliff	Joe M.		NV	1295	2	National Environmental Policy Act (NEPA)	any proposed changes to current livestock management guidelines must be addressed in a comprehensive Environmental Impact Statement (EIS), with appropriate public review, as mandated by the National Environmental Protection Act (NEPA).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	7	National Environmental Policy Act (NEPA)	.The EIS should evaluate in full any proposals to expand the use of categorical exclusions for actions thought to have "no significant impact."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	16	National Environmental Policy Act (NEPA)	The BLM should use a programmatic EIS for all types of range improvement projects nationwide, and undertake Determination of NEPA Adequacy (DNA) for all individual projects
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Timothy		NV	1095	1	National Environmental Policy Act (NEPA)	Land sales and land trades are hamstrung by the NEPA process. We recommend that the NEPA process be simplified and the length limited. We recommend that required studies be outsourced to contractors and paid for by the permittee to expedite this process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Timothy		NV	1094	2	National Environmental Policy Act (NEPA)	In order for lands sales to proceed, NEPA needs to be simplified and streamlined. The time limit hamstrings BLM employees. We recommend that required studies be outsources to contractors and paid for by the permitteeso that lands sales and trades can proceed in a timely manner.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Otley	Susan		OR	1486	5	National Environmental Policy Act (NEPA)	EA (Environmental Assesment) should be only used when things are a little more complex. Sych as the range improvement is on a larger scale, may take in more than on permit, and/or it has some special circumstance. Protests should not be part of an EA as everything isn't a major event requiring an EIS. No group should be able to have their lawters paid by the government. Any EIS (Environmental Impact Statement) should be used sparingly. That is a time consuming process and often causes harmful consequences. Which can be a numvber of things: invasive non-native species becomes widespread, Juniper invasion which causes a monopolistic area with diminished forage, a water improvement not done timley, and other range improvements and/or maintenance not done or at least timley. All protests need to be regulated to a limited number of pages. A genuine protest should be concise and to the point.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vincent	Tamara		UT	920	3	National Environmental Policy Act (NEPA)	1 Much more timely NEPA process. It is taking way too much time to get NEPA done on projects.
Public Outreach								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Iaderosa	Andrea		GA	69	1	Public Outreach	Your proposed changes will limit the opportunities for the public to be informed and is not in the best interest of the environment.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jauhola	Christine		CO	1254	1	Public Outreach	Restricting opportunities for public involvement will limit much needed input from concerned citizens knowledgeable about local land health conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Peeler	Teresa	Rising Storm	CO	15	3	Public Outreach	The thought of reducing public involvement should also be cleaned from your thoughts. Want to see apathetic Americans get angry and motivated? Shutting us out of direct involvement will cause that problem.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Laurie		NM	1374	5	Public Outreach	the original notice the BLM is especially showing bias, picking and choosing and slicing GAO findings and recommendations when it comes to unauthorized grazing and its negative impact on the land. The notice should have printed the 2016 recommendation in its entirety: -to establish a procedure for the informal resolution of violations at the local level, or follow the existing regulations by sending a notice of unauthorized use for each potential violation as provided by 43 C.F.R. § 4150.2(a) (2005); (2) The notice, and the welcome packet provided to BLM open house attendees, failed to mention the 43 years of GAO reports citing the same BLM management failures to follow agency regulations and document and penalize unauthorized grazing on federal public lands, the damage resulting from not monitoring and penalizing unauthorized grazing, and the ridiculously low fines that do nothing to deter unauthorized grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	LeBold	Charles		OR	782	1	Public Outreach	number of scoping meetings and locations inadequate for affected area. need some convenient for large metropolitan areas. these are different times and there is much more interest in types of uses provided by public lands.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950	5	Public Outreach	It is further suggested that all components of the Department of Interior should make a deliberate effort to notice all stakeholders on record, in writing, of the program along with its intended purpose and processes involved. This effort should include direct mailings as well as public postings so that all potential Claimants may have adequate notice and time to file a claim if so desired.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950	4	Public Outreach	if the Department of Interior chooses a proactive approach towards addressing such issues, public notice of the intent of the department's effort must be made public through a posting in the federal register.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heard	Tom		TX	969	1	Public Outreach	Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spotts	Richard		UT	1235	6	Public Outreach	Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry and Diane		MT	960	10	Public Outreach	Communication and interaction with all public land users is critical. Impact from recreation use of public lands is becoming an increasing issue in many areas and education of those users is as important as communication with livestock grazers.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Rankin		NM	1179	1	Public Outreach	Section 8 of Public Rangelands Improvement Act, mandates that the Secretary 'shall' carefully consultate, cooperate, and coordinate, with the lessees, permittees, and landowners involved. Updating regulations needs to be assessable and requires the discussion, collaboration, and coordination with the allotment owner. Unclear, jumbled and repetitive regulations can be damaging to the capability of the ranch. The goal of updating these regulations needs to include the legal requirement that the actions and decisions of the BLM comply with multiple uses and the stability of each ranch and the livestock industry in general.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1230	4	Public Outreach	BLM must expand opportunities for public involvement, and ensure that environmental interests are fully able to participate in the appeals and other processes. This must include BLM posting appeals on-line for Interested Public review, and allowing submitting appeals, protects, etc. electronically rather than bulky and wasteful mailings. The purpose of the public-scoping process is to determine relevant issues that will influence the scope of the EIS, including alternatives, and guide the process for developing the EIS.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lanskey	Marcus		CO	472	1	Public Outreach	Create no new exclusions and allow EAs and EISs Facilitate more public engagement
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	ST AUGUST	PATRICIA		WA	14	3	Public Outreach	Streamlining protests and appeals – This is likely a reference to a desire by the agencies to reduce timelines for public involvement, increase or codify exhaustion requirements, and to further limit opportunities for the public to be informed about and participate in.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brawer	J	wild earth guardians.		1289	1	Public Outreach	We therefore request that the BLM schedule additional public scoping meetings in each state that will be impacted by the proposed regulatory changes-at minimum, meetings should be scheduled in Washington, Oregon, Idaho, Utah, Colorado, California and Arizona. Additionally, we request that meetings be held in multiple locations in each affected state including at least one meeting in a major population center in each state.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh			1350	2	Public Outreach	We therefore request that the BLM schedule additional public scoping meetings in each state that will be impacted by the proposed regulatory changes-at minimum, meetings should be scheduled in Washington, Oregon, Idaho, Utah, Colorado, California and Arizona. Additionally, we request that meetings be held in multiple locations in each affected state including at least one meeting in a major population center in each state.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	LeBold	Cora		OR	1287	1	Public Outreach	The locations could not be further from the population centers in the western lands.The closest meetings for people in the NW are Elko, NV and Miles City, MT.. and in the middle of winter. I feel you need many more meetings scheduled for the convenience of the landowners.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Maryboy	Kenneth	San Juan County Commission	UT	1427	1	Public Outreach	None of the scheduled open houses are near enough for San Juan County permittees to be able to easily attend. We recommend that a local Field Office meeting be held to help permittees better understand the current process and opportunity for change in the regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	18	Public Outreach	Section General Topic Public Involvement Comment/Observation It appears the BLM is no longer using the Federal Register exclusively to solicit public comments, opting instead for press releases on the BLM website. Action Requested Action: The Department request actions that require public involvement be published to both the Federal Register and to the BLM website to ensure the public is adequately notified. The Federal Register is the accepted method to initiate the public scoping process. Vering from this process creates confusion and lack of transparency of actions.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1230	1	Public Outreach	In addition, we are very concerned that the information presented to the public at the scoping meeting failed to provide any details at all about many elements of the radical revision to the grazing regulations found in the Federal Register Notice.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	10	Public Outreach	F.Improve communications with the public and increase public engagement, through methods such as posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. In addition the public should have easy access to accurate and site specific economic analyses of grazing on every permit renewal, including a comparison of the income from grazing fees with the costs of administering the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bruegger	Retta	Colorado State University Extension	CO	1336	1	Public Outreach	Do you have any ability to attend the Open Houses via videoconference, or are you planning on holding a webinar on the proposed changes? I would like to attend an open house, but there are none offered nearby.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	8	Public Outreach	The interested public role should be limited to broad scale strategies as determined and reflected in land use plans. This is even more significant when the interested public is given a prominent position for participation in the CCC process including the development of Allotment Management Plans.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Benes	Michelle		IA	745	2	Public Outreach	Public meetings regarding regulation revisions need to be held in Utah, Arizona, Colorado, Idaho, California, Oregon or Washington, not just four rural towns. Everyone in these states, indeed the entire United States, have a stake in revisions to these regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Blair	Dan			1190	6	Public Outreach	Our recommendations: * Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brewer	Clay	Wild Sheep Foundation	MT	825	2	Public Outreach	In conducting environmental analyses of proposed grazing management, we feel BLM should continue to provide ample opportunity for public participation. WSF appreciates the opportunity to comment via this letter, but we respectfully request BLM to hold additional public meetings on this proposal (in addition to the 4 meetings held to date). Please extend the comment period to facilitate additional meetings.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Erma		NY	113	3	Public Outreach	Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	6	Public Outreach	5.The EIS should evaluate the impact on public involvement of proposals to streamline protests and appeals by reducing the length of comment periods or by requiring a level of data collection that some members of the public cannot provide.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	27	Public Outreach	16) BLM should extend the comment period and provide public meetings in the remaining states with BLM lands managed for grazing including the states of Utah, Arizona, Colorado, Idaho, California, Oregon or Washington. Further, these meetings should not just be in rural areas but in more densely populated areas where many public members that use public lands could participate in this process
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Glasenapp	Logan	New Mexico Wilderness Alliance	NM	1040	1	Public Outreach	The public has a vested interest in grazing decisions, as these decisions effect opportunities for other uses of the land. Recreationalists of all backgrounds, for example, will want to protect important lands, streams, and wildlife from the impacts of grazing and they will only be able to do so through a robust public participation process. The National Environmental Policy Act (NEPA) and the Council on Environmental Quality (CEQ) regulations require public participation in these types of processes. Any changes to the public participation aspects of the current grazing regulations must meet the minimums set by NEPA and CEQ regulations and should indeed go above and beyond these minimums.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh			1350	3	Public Outreach	We also request that the comment deadline be extended until April 20 or at least 15 days after the last public meeting, whichever comes later.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh			1350	1	Public Outreach	Specifically, we request a minimum 45-day extension given that this scoping period overlaps with the comment deadlines for proposed and related revisions to the Council on Environmental Quality's National Environmental Policy Act. This places a tremendous burden on the interested public who wish to engage in both comment opportunities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Biers	Samuel	Te-MoaK Tribe of Western Shoshone	NV	1267	2	Public Outreach	The Te-Moak Tribe of Western Shoshone Indians of Nevada invites the United States and the Bureau of Land Management to extend the deadline for comment prior to making any change or amendment to any grazing rule or regulation so that the leadership at the BLM can satisfy its legal mandate to formally consult with the Tribe beforehand.
Range of Alternatives								

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cascade	Robyn	Great Old Broads for Wilderness; Northern San Juan chapter	CO	1102	12	Range of Alternatives	we support the alternative submitted by conservation organizations and below we highlight some of the conditions outlined in the conservation alternative. 1. 30% utilization. If there is any one thing that would make grazing management more efficient, it would be conservative utilization, which would mean less riparian trampling, less invasive species, less erosion. A key document is Holechek's review of utilization rates and the benefits of conservative utilization for both the permittee's finances and the ecological condition of the land. 2. Non-use. The alternative allows non-use annually for up to ten years into permittee options at several places. 3. Review of allotment health conditions at least every ten years. 4. Native species. Planting or seeding of non-native species is prohibited except in rare cases where native plants cannot solve a specific problem. 5. Public accountability. The alternative requires public input, response to public concerns, and reporting of outcomes, all for accountability to the public about consequences of grazing. 6. Monitoring thresholds. The triggering of a change of course (adaptive management) depends on both quantitative thresholds that require changes in an activity when crossed, and monitoring to detect whether thresholds have been crossed. 7. Predator control. Non-lethal only. 8. Permittees waiting on the edges. Deletes current regulations that allow permittees to use allotments temporarily that for approved reasons aren't being used by the current permittee.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Small	Sue		NM	995	1	Range of Alternatives	There have been many interested parties working on an alternative plan of action which must be included in the Draft EIS as an alternative plan. This plan has been crafted to emphasize proper stewardship and land conservation; and has already been submitted to the BLM; this alternative will offer a solid basis for comparison of grazing regulation alternatives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	41	Range of Alternatives	Then BLM must undertake targeted restoration of all these areas and removal of damaging livestock facilities. This is crucial to determine if the very same areas where the public was promised wildlife habitat would be supported are some of the same areas where exploitive TG, OBG, extreme flexibility and other elements if the Reg change would be imposed. It is also essential to developing a reasonable range of alternatives, including Reg change alternatives that focus on minimizing grazing disturbance, and to achieve restoration and support FLPMA's sustainability mandate.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	2	Range of Alternatives	The Grazing Regs analysis must consider a full range of alternatives minimizing such treatments to address weed and fire concerns, to increase site "resistance and resilience", etc. and instead must focus on passive restoration, and removal of flammable crested wheat. To actually restore lands faced with weed threats, BLM must, apply large-scale passive restoration.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	McConvill	Barbara		UT	801	1	Range of Alternatives	Please publish the conservation-based proposed grazing regulations revisions in your draft environmental review and compare the environmental consequences of these revisions to the consequences of those you proposes.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	KERR	Laurie	Great Old Broads For Wilderness	WA	896	1	Range of Alternatives	I would like to propose that the alternative submitted to the BLM by several conservation groups be placed in the Draft EIS as an alternative which would be compared with the BLM alternatives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Thompson	Diane	Great Old Broads for the Wilderness	CO	1061	1	Range of Alternatives	I strongly recommend that the BLM use the conservations groups' alternative in the Draft EIS as the alternative -- not the BLM alternatives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	10	Range of Alternatives	I require the EIS to include the alternative of legal reduction of private/corporate domestic livestock grazing in the wild horse herd area lands (both herd management areas HMA and herd areas HA) , pursuant to 3 C.F.R. 4710.3-2 and 43 C.F.R. 4710.5(a), the BLM's authority to reduce livestock grazing pursuant to 43 C.F.R. 4710.5 in order "to provide habitat for wild horses or burros." There are no restrictions on usage of this authority as it is fully available to the BLM as an option within the EIS.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	KERR	Laurie	Great Old Broads For Wilderness	WA	896	2	Range of Alternatives	I purport that 30% utilization of the BLM lands is necessary to reduce spread of invasive species, reduce riparian trampling, and reduce erosion.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	2	Range of Alternatives	Consistent with our mission and values, the Great Old Broads for Wilderness strongly support the thorough analyses and adoption of grazing regulations that provides protection for important wildlife habitats, limits fragmentation of the sagebrush steppe ecosystem, protects and improves riparian and aquatic resources, and increases opportunities for quiet recreation such as hunting, fishing, hiking, backpacking, and wildlife watching.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieannah	American Wild Horse Campaign	VA	966	2	Range of Alternatives	AWHC strongly opposes any alternative that would continue to allow, or increase, grazing within wild horse and burro federally designated habitat, Herd Management Areas (HMA's) and Herd Areas (HA's).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Blair	Dan			1190	10	Range of Alternatives	Analyze and adopt reasonable alternatives emphasizing efficiency, public accountability, science, and native species on BLM lands

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	22	Range of Alternatives	As the BLM develops the range of alternatives to consider through the EIS development and NEPA processes, we encourage you to establish the following language, or something similar, as the preferred alternative: "Preferred Alternative: Implementation of the 1996 Babbitt Rules, as affirmed by the U.S. Supreme Court in Public Lands Council v. Babbitt, 529 U.S. 728, 120 S.Ct. 1815, 146 L.Ed. 2d 753 (2000), but: (a) as to be amended by the new provisions adopted in the Federal Land Policy and Management Act on December 19, 2019, 128 Stat. 3762-64, Public Law 113-291, Section 3023 (12/19/2014); and (b) as to be amended by proposed amendments identified in the scoping process, with the removal of Subpart 4180."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Parkinson	Laurie		CO	991	5	Range of Alternatives	You must include in the Draft EIS the alternative submitted to the BLM by several conservation groups. This alternative should be compared with the BLM alternatives. It includes 30% utilization to reduce erosion, among other benefits, which ultimately benefits the rancher in terms of improved ecological condition of the range. Another option should be a non-use management alternative for up to 10 years, and at the very least a 10 year in-depth review of allotment conditions. Use of non-native plants should also be eliminated, and only non-lethal predator control should be allowed. Additionally, ranchers should be required to use adaptive management, which requires frequent monitoring of cattle and range conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	9	Range of Alternatives	We urge BLM to consider five (5) alternatives in its intended NEPA document, as follows: Alternative #1 No Action Implementation of the 2016 Bush Rules. This alternative would consider re-adoption of the grazing regulations promulgated in 2016 during the Bush Administration. Alternative #2 Implementation of the 1996 Babbitt Rules. This alternative would consider re-adoption of the grazing regulations promulgated in 1996 during the Clinton Administration. Alternative #3 Implementation of the 1996 Babbitt Rules, as affirmed by the U.S. Supreme Court in Public Lands Council v. Babbitt, 529 U.S. 728, 120 S.Ct. 1815, 146 L.Ed. 2d 753 (2000). This may also be consider a "No Action" alternative; given the Federal Courts enjoined the implementation of the 2016 Bush Rules in Western Watersheds Project v. Kraayenbrink, et al., 538 F. Supp. 2d 1302 (D. Idaho 2008), aff'd in relevant part, 632 F.3d 472 (9th Cir. 2011), cert. denied, 132 S.Ct. 366 (2011). Alternative #4 Implementation of the 1996 Babbitt Rules, as affirmed by the U.S. Supreme Court in Public Lands Council v. Babbitt, 529 U.S. 728, 120 S.Ct. 1815, 146 L.Ed. 2d 753 (2000), but: (a) as to be amended by the new provisions adopted in the Federal Land Policy and Management Act on December 19, 2019, 128 Stat. 376264, Public Law 113291, Section 3023 (12/19/2014); and (b) as to be amended by proposed amendments identified in our March 3rd comments, with the removal of Subpart 4180. Alternative #5 Implementation of the 1996 Babbitt Rules, as affirmed by the U.S. Supreme Court in Public Lands Council v. Babbitt, 529 U.S. 728, 120 S.Ct. 1815, 146 L.Ed. 2d 753 (2000), but: (a) as to be amended by the new provisions adopted in the Federal Land Policy and Management Act on December 19, 2019, 128 Stat. 376264, Public Law 113291, Section 3023 (12/19/2014); and (b) as to be amended by proposed amendments in our March 3rd comments, without the removal of Subpart 4180 though with the proposed amendments to Subpart 4180 in our March 3rd comments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Norton	Jenny			1150	1	Range of Alternatives	I am requesting you publish the conservation-based proposed grazing regulations in your draft review so the public can have an alternative to your existing proposal. This will allow us to compare the consequences of your current proposal

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	30	Range of Alternatives	Based on the work of a number of scientists and experts, an alternative has been developed that emphasizes efficiency, public accountability, science, and native species on BLM lands. This alternative recognizes shortcomings in existing regulations and promises to more fully implement FLPMA. We ask that this reasonable alternative be considered in the EIS for this revision of the regulations for grazing administration.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mulder	Bill	Tree Top Ranches, LP	ID	1114	6	Range of Alternatives	Alternative #5 - Implementation of the 1996 Babbitt Rules, as affirmed by the U.S. Supreme Court in Public Lands Council v. Babbitt, 529 U.S. 728, 120 S.Ct. 1815, 146 L.Ed. 2d 753 (2000), but: (a) as to be amended by the new provisions adopted in the Federal Land Policy and Management Act on December 19, 2019, 128 Stat. 3762-64, Public Law 113-291, Section 3023 (12/19/2014); and (b) as to be amended by proposed amendments in our March 4th comments, without the removal of Subpart 4180 though with the proposed amendments to Subpart 4180 in our March 4th comments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mulder	Bill	Tree Top Ranches, LP	ID	1114	5	Range of Alternatives	Alternative #5 - Implementation of the 1996 Babbitt Rules, as affirmed by the U.S. Supreme Court in Public Lands Council v. Babbitt, 529 U.S. 728, 120 S.Ct. 1815, 146 L.Ed. 2d 753 (2000), but: (a) as to be amended by the new provisions adopted in the Federal Land Policy and Management Act on December 19, 2019, 128 Stat. 3762-64, Public Law 113-291, Section 3023 (12/19/2014); and (b) as to be amended by proposed amendments in our March 4th comments, without the removal of Subpart 4180 though with the proposed amendments to Subpart 4180 in our March 4th comments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mulder	Bill	Tree Top Ranches, LP	ID	1114	4	Range of Alternatives	Alternative #4 - Implementation of the 1996 Babbitt Rules, as affirmed by the U.S. Supreme Court in Public Lands Council v. Babbitt, 529 U.S. 728, 120 S.Ct. 1815, 146 L.Ed. 2d 753 (2000), but: (a) as to be amended by the new provisions adopted in the Federal Land Policy and Management Act on December 19, 2019, 128 Stat. 3762-64, Public Law 113-291, Section 3023 (12/19/2014); and (b) as to be amended by proposed amendments identified in our March 4th comments, with the removal of Subpart 4180.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mulder	Bill	Tree Top Ranches, LP	ID	1114	3	Range of Alternatives	Alternative #3 - Implementation of the 1996 Babbitt Rules, as affirmed by the U.S. Supreme Court in Public Lands Council v. Babbitt, 529 U.S. 728, 120 S.Ct. 1815, 146 L.Ed. 2d 753 (2000). This may also be consider a "No Action" alternative; given the Federal Courts enjoined the implementation of the 2016 Bush Rules in Western Watersheds Project v. Kraayenbrink, et al., 538 F. Supp. 2d 1302 (D. Idaho 2008), aff'd in relevant part, 632 F.3d 472 (9th Cir. 2011), cert. denied, 132 S.Ct. 366 (2011).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mulder	Bill	Tree Top Ranches, LP	ID	1114	2	Range of Alternatives	Alternative #2 - Implementation of the 1996 Babbitt Rules. This alternative would consider re-adoption of the grazing regulations promulgated in 1996 during the Clinton Administration.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mulder	Bill	Tree Top Ranches, LP	ID	1114	1	Range of Alternatives	Alternative #1 - No Action - Implementation of the 2016 Bush Rules. This alternative would consider re-adoption of the grazing regulations promulgated in 2016 during the Bush Administration

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ostlie	Susan	Rio Grande Valley Broadband of the Great Old Broads for Wilderness	NM	955	1	Range of Alternatives	I would request that you include the alternative submitted to the BLM by several conservation groups, including the national office of the Great Old Broads for Wilderness. This alternative should be placed in the Draft EIS to be compared with the BLM alternatives. This alternative includes 30% utilization to reduce erosion, among other benefits, which ultimately benefits the rancher in terms of improved ecological condition of the range.
Best Available Science and Baseline Data								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Frank		ID	1281	1	Best available science and Baseline data	- First, please use modern science and methods for determining carrying capacity, season of use, and determination of suitability of land areas for grazing. Do not use generic approaches, but instead make grazing decisions specific to each piece of landscape, considering the factors relevant to that specific piece of ground. The good science comes from the industry and independent, unbiased research (e.g., universities) and does not typically originate in Washington D.C. or the federal government. Do not perpetuate bad science through the continued application of models (such as the USFS Bighorn model) or other resources that are not credible.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moran	Barbara		WA	13	1	Best available science and Baseline data	New Research Says Plant-based Diet Best for Planet and People SCIENCE & TECHNOLOGY : Food Security, Agriculture, Climate Change, Health 2014•11•15 Carol Smith United Nations University https://ourworld.unu.edu/en/new-research-says-plant-based-diet-best-for-planet-and-people
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Curtis	Elko County	NV	905	6	Best available science and Baseline data	Guide to Vegetation Treatment Costs for Land Management in the Great Basin Region, Sagebrush Steppe Treatment Evaluation Project, 2011.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Katlyn	Nevada State Grazing Board N2	NV	1174	8	Best available science and Baseline data	The N-2 grazing board strongly supports the use of introduced plant species to improve ecological function of ecosystems at risk of conversion to invasive annual dominated communities. As previously mentioned under the topic of wildfire, annual species such as cheatgrass and medusahead rye typically increase in density which in turn increases fire return intervals. Increased fire return intervals result in annual dominated systems. As stated by the scientific report, Improving Seeding Success on Cheatgrass-Infested Rangelands in Northern Nevada by Clements et. al. (2017), the best-known suppression method of invasive annuals and associated fuels is through establishment of perennial species. Due to early maturing phenology of annuals, they often have a competitive advantage over native species. As recommended by a diverse panel of rangeland scientists during the 2008 Great Basin Wildfire Forum, adapted perennial, including non-native, species should be used to rehabilitate areas where cheatgrass was dominant in the pre-fire understory and/or where perennial grasses were sparse and annuals are expected to substantially increase. The Medusahead Management Guide for the Western United States (Kyser et.al. 2014) indicates any introduced plant materials are generally less expensive than native species, have higher establishment rates, germinate more quickly, and are ultimately more competitive with annuals compared to natives. The general assumption that seeding adapted perennial bunchgrasses like crested wheatgrass always results in monoculture stands is not supported. Rather, environmental variables like soil texture and management practices substantially benefit native plant abundance and cover in crested wheatgrass seedings, as reported in the Native Vegetation Composition in Crested Wheatgrass in Northwestern Great Basin by Nafus et. al. (2020). Grazing adapted introduced seedings can be pivotal in re-establishing native species after the site is stabilized. In the interest of perennial plant establishment and ultimately native community restoration the Board strongly recommends that regulations support flexibility in grazing management accompanied by the use of adapted perennial plant species in range reclamation and improvement efforts.
	catlin	james	Sierra Club	UT	1085	9	Best available science and Baseline data	18 Strand, E.K., Launchbaugh, K.L., Limb, R.F., and Torell, L.A., 2014, Livestock grazing effects on fuel loads for wildland fire in sagebrush dominated ecosystems: Journal of Rangeland Applications, v. 1, p. 35-57. 19 Schmelzer, L., B. Perryman, B. Bruce, B. Chultz, K. McAdoo, G. McCuin, S. Swanson, J. Wilder, & K. Conley. In press. Reducing cheatgrass (Bromus tectorum L.) fuel loads using fall cattle grazing: a case study. Professional Animal Scientist. 20 Ganskopp, D and D Bohnert. 2001. Nutritional dynamics in 7 norhtern Great Basin grasses. J. Range Management 54 740-647.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	10	Best available science and Baseline data	USGS report titled "A Conservation Paradox in the Great Basin-Altering Sagebrush Landscapes with Fuel Breaks to Reduce Habitat Loss from Wildfire"[22] considered targeted grazing "limited and novel usage" and did not recommend this for general application.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	7	Best available science and Baseline data	U.S. Department of Agriculture and U.S. Department of Interior, issue this timely and critically needed document, Pollinator-Friendly Best Management Practices for Federal Lands, May 11, 2015. https://www.fs.fed.us/wildflowers/pollinators/BMPs/documents/PollinatorFriendlyBMPsFederalLands05152015.pdf .

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	2	Best available science and Baseline data	In addition, the forthcoming EIS must include: In addition, the forthcoming EIS must include: a) All historical, current and future ten-year range monitoring and plans. b) An updated and scientifically supported and defensible census of all on the range wildlife, including wild horses and burros, born and died in the past ten years and age at death and cause of death. Approximation numbers are acceptable if scientifically supportable. c) A no action alternative - with detailed scientific review of this alternative - both pro and con. d) A discussion and a detailed map regarding and including all current and proposed fencing,gates and cattle guards within the proposal area and reason for the fencing. e) A scientific discussion regarding how fencing and cattle guards and gates influence the wildlife, including wild horses and burros, from accessing any water sources and forage sources and how these fences effect wildlife, including wild horses and burros, genetic health and variability. f) The proposed EIS must include a section discussing those alternatives that were considered but rejected with a detailed explanation of the reasons for their elimination and not just respond "outside the scope". Nothing is "outside the scope" if it affects the public lands and the NEPA law requires that all relevant scientific information be provided to the American public.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Larson	Pat and Larry		OR	1407	10	Best available science and Baseline data	Larson, L.L., P.A. Larson. 2020. Animal Track Accumulation on Streambanks of Four Eastern Oregon Streams. Rangeland Ecology & Management. In Press. L. Larson, P. Larson and D.E. Johnson, Differences in Stubble Height Estimates Resulting from Systematic and Random Sample Designs, Rangeland Ecology & Management 72 (2019) 586- 589.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	33	Best available science and Baseline data	This would include the science that has shown that a dormant season grazing system that incorporates moderate spring-through-summer use combined with utilizing 50% of the standing plant biomass "is a preferable, and moreover, a beneficial management alternative" in increasing greater herbage production and greater leaf heights in many grasses (Faulkner et al. 2002).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Honer-Orton	M.		UT	664	1	Best available science and Baseline data	There is substantial scientific data and literature that shows grazing is a significant cause of the spread of invasive species such as cheatgrass.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	12	Best available science and Baseline data	There is no record that BLM has followed the protocol described for peer review for targeted grazing or for fuel breaks. Some studies promote targeted grazing noting temporary reductions of unwanted exotic annual grass. Other studies show serious problems for wildlife an ecological processes. Further there is an absence of evidence that fires have been significantly reduced or better controlled using targeted grazing or fuel breaks. For this reason, this topic is ripe for a comprehensive peer review and independent scientific investigation. Before BLM makes policy based on the unproven benefits of targeted grazing, such a practice needs to first be independently verified. BLM's failure to promote peer review as required weakens the legal authority of future decisions.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	7	Best available science and Baseline data	The scientific literature on the environmental impacts from domestic grazing is extensive; See US EPA (1994), Poff et al. (2012), and Fleishner (2010) for literature reviews.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	27	Best available science and Baseline data	The rules should require mitigation for all the significant ecological impacts of livestock grazing described in Fleischner, T.L. 2010. Livestock grazing and wildlife conservation in the American West: historical, policy, and conservation biology perspectives. Pages 235-265 in J. DuToit, R. Kock, and J. Deutsch, eds. Wild Rangelands: Conserving Wildlife While Maintaining Livestock in Semi-Arid Ecosystems. Zoological Society of London/ Blackwell Publishing Ltd., Oxford, UK. and Fleischner, T. 1994. Ecological Costs of Livestock Grazing in Western North America. Conservation Biology. Volume 8 Issue 3, Pages 629 - 644. http://www.rmrs.nau.edu/awa/riphthreatbib/fleishner_ecocosts.pdf .
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	19	Best available science and Baseline data	The cost to tax-paying Americans of grazing domestic livestock on public lands is heavily researched with the following results: "The Government Accountability Office (GAO) has reported the federal government spends at least \$144 million each year managing private livestock grazing on federal public lands, but collects only \$21 million in grazing fees-for a net loss of at least \$123 million per year". http://www.taxpayer.net/user_uploads/file/factsheet_Grazing_Fiscal_Costs(3).pdf
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	11	Best available science and Baseline data	I require the EIS provide all livestock use information and all livestock monitoring information for all livestock grazing allotments within the EIS plan lands for at least the past ten years.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	12	Best available science and Baseline data	I require the EIS include the environmental impacts to make or re-affirm private/corporate domestic livestock grazing as the predominant use in the EIS plan including all details of research studies and methods of research of these studies and names of public agency or private or educational institutions providing the environmental impact data and results of this research.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	22	Best available science and Baseline data	BLM must conduct new herbicide risk assessments, as the combined effects of the many elements of the proposed Reg changes that will intensify grazing damage to veg./crusts/soils/habitats/watersheds, and the serious new and expanded habitat disturbance, degradation and fragmentation from many proposed fuelbreaks and BLM woody veg treatments will further explode weed problems. This will be met with attempts to use ever increased amounts (often futilely) of toxic herbicides on public lands - exposing ecosystems, waters, wildlife, rare plants and the public to these hazardous chemicals.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	39	Best available science and Baseline data	The shrub-steppe and desert environments of the interior West, including southeastern Oregon, evolved without significant grazing pressure. This is because bison and other large herbivores were relatively uncommon west of the Continental Divide before Euro-American settlement (Mack & Thompson 1982, Warren & Eldridge 2001, Knapp 1996). The introduction of livestock devastated native bunchgrasses and paved the way for weed invasion. Historical grazing practices established cheatgrass throughout the Intermountain West (Yensen 1981, Knapp 1996, Chambers & Wisdom 2009, Condon & Pyke 2018). Today, grazing continues to drive annual grass invasions throughout the Great Basin. Grazing spreads invasive annual grasses by removing native perennial grasses (Reisner et al. 2013, Rosentreter 1994, Chambers et al. 2007, Belsky & Blumenthal 1997, Briske & Richards 1995), by disturbing soils (Olff & Ritchie 1998), and by damaging biological soil crusts (Belnap 2006, Chambers et al. 2014, Reisner et al. 2013, Ponzetti, McCune, & Pyke 2007, Warren & Eldridge 2001, Belnap 1995)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	40	Best available science and Baseline data	Livestock also distribute annual grass seeds across the landscape through their hooves, fur, and digestive tracts (Schiffman 1997, Olff & Ritchie 1998, Chambers et al. 2016, Mack 1981, Knapp 1996). According to Bartuszevige & Endress (2008), "[c]attle disperse more than an order of magnitude more non-native grass seeds per animal than do elk or deer." Over 70% of viable seeds in cattle feces were exotic grass species (Bartuszevige & Endress 2008; see also Janzen 1994, Getz & Baker 2008). Areas around troughs, salt/supplement sites and watering sites are especially vulnerable to invasion because of the high amount of trampling disturbance
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	44	Best available science and Baseline data	The Comer et al. 2012 Rapid Ecoregional Assessment described adverse change agents to arid ecosystems as: wildfires, development, invasive species, climate change. Grazing is implicated in all of these (including through livestock facility "developments" which will become even greater in number to support intensive grazing schemes (including placement of water haul troughs and other highly damaging actions).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Muhs	Rocio		MT	617	1	Best available science and Baseline data	There is no evidence that grazing reduces the risk of wildfires but there is plenty evidence of how detrimental grazing is to the land. however, grazing increases the dispersion of invasive weeds and destroys habitat for other flora and fauna. In addition, the urine produced by livestock faults watersheds. This not only affects the fauna but the humans who live by BLM lands and whose water supply comes from wells.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	1	Best available science and Baseline data	all available scientific research and reports must become a part of the administrative record for this scoping and the upcoming public land grazing proposal and also must be provided to the public and the decision makers.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	43	Best available science and Baseline data	ther examples of livestock grazing literature needing consideration includes, but is not limited to: * Bates et al. 2009 - Concluded that properly applied livestock grazing after low severity prescribed fire will not hinder the recovery of herbaceous plant communities in Wyoming big sagebrush steppe. * Knopf 1996 - Season of grazing is more important than intensity of grazing. Late-season grazing on dormant vegetation has little effect on bird communities (Knopf 1996). * Johnson et al. 2011 - Moderate and low stocking rates of cattle grazing on bunchgrass communities in northeastern Oregon caused no negative impacts to ground-nesting songbirds. These stocking rates generally provided suitable habitat for all species studied and results were similar to the no grazing treatment. * Whitehurst and Marlow 2013 - In mountain big sagebrush habitat, higher forb nutrient density that is critical for pre-incubating sage-grouse hens and survival of young broods can be achieved with targeted cattle grazing and selective thinning of mature mountain big sagebrush stands. * West et al. 1984 - Found no significant increases in perennial grasses with long-term rest and cautioned managers that livestock exclusion will not result in a rapid improvement of native herbaceous component on sites dominated by woody vegetation. * Sneva et al. 1984 - Noted some slight increases in perennial grasses with thirty years of livestock exclusion in the sagebrush steppe, but this increase was less than what occurred on an adjacent grazed site, and after 35 years grass frequency had become slightly higher on the area outside the exclosure. The authors concluded that direct reductions in sagebrush would be required to greatly increase perennial grasses. * Holechek & Stephenson 1983 - Sagebrush communities in New Mexico rested for twenty- two years compared to moderately grazed areas had minimal vegetation differences and the differences that did occur included greater perennial grass cover in the grazed areas. This suggests that moderate grazing may have been beneficial. Thus, it remains unclear if long- term grazing rest will facilitate increases in the perennial herbaceous understory in communities with dense sagebrush overstories. * Laycock 1967 - found that fall grazing (with sheep) and grazing exclusion resulted in a 30% increase in production of perennial grasses and perennial forbs compared to spring use. In this case, a change in the timing of grazing had the same effect as the long-term exclusion of grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	40	Best available science and Baseline data	The sustainability and conservation of the ecosystem are necessary to provide resistance to weed invasion and resilience after disturbance (McAdoo et al. 2013) that in turn provide sage-grouse habitat across landscapes and over time (Miller and Eddleman 2001)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	32	Best available science and Baseline data	The inclusion of the best available science related to livestock grazing is absolutely essential for adequate analysis to permit a reasoned choice. The BLM must not rely on some publications which assert that grazing can have adverse impacts. These papers actually highlight a common thread of grazing effects through legacy management (prior to the Taylor Grazing Act) or grazing, when not adaptively managed. A selection of science showing the effects of managed grazing include Davies et al. 2009 and Davies et al. 2010, which both demonstrated through field research that managed grazing can increase the resiliency of sagebrush habitats, reduce the risk and severity of wildfire, and decrease the risk of exotic weed invasion.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	19	Best available science and Baseline data	The cost to tax-paying Americans of grazing domestic livestock on public lands is heavily researched with the following results: "The Government Accountability Office (GAO) has reported the federal government spends at least \$144 million each year managing private livestock grazing on federal public lands, but collects only \$21 million in grazing fees-for a net loss of at least \$123 million per year". http://www.taxpayer.net/user_uploads/file/factsheet_Grazing_Fiscal_Costs(3).pdf
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	2	Best available science and Baseline data	The 2018 rangeland health report on BLM grazing allotments showed that of the total acres assessed (roughly 60% of federally managed lands that are grazed), 42% failed BLM standards for Rangeland Health, and of those allotments that failed, 70% is due to livestock overgrazing. PEER, Mar. 5, 2020 (reporting BLM data).1 BLM must take into account this and other existing land health data and other relevant information when describing the existing affected environment in the environmental analysis. 1 Public Employees for Environmental Responsibility, "America's Rangelands Deeply Damaged by Overgrazing" (news release) (March 5, 2020), available at https://www.peer.org/americas-rangelands-deeply-damaged-by-overgrazing/ . Other factors BLM should consider in establishing an accurate environmental baseline include, but are not limited to: sagebrush and native shrub cover and health; abundance and diversity of native plant species; native understory composition (e.g. forbs, perennial grasses); soil integrity, including presence and condition of biotic crust; acres impacted by invasive species; acres of non-native seedings; water resources and water quality; wetland and riparian conditions; acres of conifer expansion; acres burned by wildfire; acres burned by prescribed fire; presence of state and federal threatened, endangered, and other special status species; presence and extent of livestock grazing infrastructure; and known and potential effects of climate change on natural resources and ecosystem resiliency, including greenhouse gas emissions, rates of carbon sequestration, and climate change resiliency.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	41	Best available science and Baseline data	Svejcar et al. (2014) highlights that "Because grazing is a complex ecological process, synthesis of scientific literature can be a challenge." The authors (27 prominent range scientists from 10 western states) do recognize that "Legacy effects of uncontrolled grazing during the homestead era further complicate analysis of current grazing impacts..." The authors maintain that, although there are areas on the landscape where grazing impacts can be identified, there are also vast grazed areas where impacts are minimal. Over the last 20-50 years land managers have actively sought to bring populations of native and domestic herbivores in balance with the potential of vegetation and soils (Svejcar et al. 2014).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	37	Best available science and Baseline data	Similarly, Courtois et al. (2006, p. 574) indicated that, for 16 Nevada sites (13 of which were sagebrush communities), "Few changes in species composition, cover, density, and production inside and outside exclosures have occurred in 65 years, indicating that recovery rates since pre-Taylor Grazing Act conditions were similar under moderate grazing and grazing exclusion..."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Blair	Dan			1190	1	Best available science and Baseline data	Require use of the best available science in livestock grazing decisions.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Oster	Sherry		CA	1056	1	Best available science and Baseline data	Require use of the best available science in livestock grazing decisions such as the following data. BLM RANGELAND HEALTH STANDARDS EVALUATION DATA (2012) PEER's reconciliation of BLM's data - A Picture of Recorded Livestock Grazing Impacts on Land Health on Western Public Lands https://mangomap.com/pdl/maps/24736/blm-rangeland-health-standards-evaluation-data-2012-#
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ratliff	Joe M.		NV	1295	1	Best available science and Baseline data	new rules should strengthen and improve current management methodologies governing grazing on BLM administered lands. Furthermore, and just as important, any new regulations must be based on sound scientific analyses and contemporary data collection and studies.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	34	Best available science and Baseline data	It is important to understand the reentry for grazing in most areas (e.g., spring/summer and fall grazing in the same year) WILL be required in order to meet objectives, especially where cheatgrass is present and needs reduced. Mosley and Rosell (2006) highlight "annual grass density may exceed pre-treatment levels within one to five years" if grazing schemes are not employed that reduce density along with yield (p. 71). This will require reentry nearly every year, at least every year with fall precipitation, to allow fall grazing that has been shown, in Nevada, to reduce yield AND density of cheatgrass (Tausch et al., 1994. Smeltzer et al. (Gund Ranch research)).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	28	Best available science and Baseline data	It is imperative that flexibility be provided in not only the season of use, but other terms and conditions. For instance, many grazing permits have rigid utilization terms and conditions that work against adaptive management. Please analyze and include adjustments in utilization terms and conditions based on current rangeland science using studies such as Smith et al. (2005)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	39	Best available science and Baseline data	In another paper, Davies et al. (2011, p. 2575) concluded that "Though appropriately managed grazing is critical to protecting the sagebrush ecosystem, livestock grazing per se is not a stressor threatening the sustainability of the ecosystem. Thus, cessation of livestock grazing will not conserve the sagebrush ecosystem.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	14	Best available science and Baseline data	For all public lands areas, BLM must provide: - Maps of all existing routes or their descriptive categories/route types. - Current travel plans. - Specific data on how frequently access road use and/or off-road driving will take place. - Specific info on driving-impacted sensitive species seasonal habitats and wildlife habitat use disturbance; projected severity of vehicle impacts to soils and microbiotic crusts; to vegetation and increased weed spread risk, to watersheds. - Data on wildlife and wild horse seasonal habitats that project access routes will traverse and/or that are present in all areas where driving may occur. - Data on the extent of noxious and other weed infestations on the interspersed and other private lands where vehicles (and cows) may be entering the project area from and then spreading weeds onto and across public lands - Data on weed infestations all along access routes (or where cows will be trailed) to access the site. Power-washing does no good if vehicles pick up weed seeds enroute and then carry them cross-country, or if the BLM and/or private lands that are driven over contain weeds that are then spread into uninfested areas as a result.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Hank	Nevada State Grazing Board N2 District	NV	1471	11	Best available science and Baseline data	environmental variables like soil texture and management practices substantially benefit native plant abundance and cover in crested wheatgrass seedings, as reported in the Native Vegetation Composition in Crested Wheatgrass in Northwestern Great Basin by Nafus et. al. (2020).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	19	Best available science and Baseline data	Dong Wang, Gao-Lin Wu, Yuan-Jun Zhu, Zhi-Hua Shi. 2014. Grazing exclusion effects on above- and below-ground C and N pools of typical grassland on the Loess Plateau (China). Catena 123 (2014) 113-120. https://web.archive.org/web/20170808225058/http://lab.yangling.cn/UploadFile/ea_201482785433.pdf ("Results showed that soil carbon content in the topsoil, plant biomass and diversity, and grasses increased, while bulk density, pH and forbs decreased after grazing exclusion. The increases in soil carbon content, the cumulative organic carbon pool and the rate of change in the cumulative organic carbon pool mainly occurred in the upper 20 cm soil layer after 8 years of grazing exclusion. Our study suggested that the 8-year grazing exclusion had a great influence on the carbon pools ...").
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	38	Best available science and Baseline data	Davies et al. (2009 and 2010) also found that long-term rest increases the likelihood of fire-induced mortality of perennial bunchgrasses because more fuel resides on the root crown of perennial bunchgrasses and that post-fire exotic annual grass invasion was greater in sagebrush plant communities where livestock grazing had been excluded for more than half a century compared to moderately grazed areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ball	Robert		CO	1083	3	Best available science and Baseline data	BLM should provide access to peer reviewed, statistically significant studies that validate the feasibility of using livestock to manage cheatgrass infestations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	7	Best available science and Baseline data	BLM has not followed peer review requirements[16] concerning a number of key scientific topics. Decades of scientific information has come forward, much of it showing that had peer review requirements been followed, BLM is likely to have come to distinctly different conclusions had they considered all objective independent information. 16 Executive Office of the President. 2004. Final Information Quality Bulletin for Peer Review

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	1	Best available science and Baseline data	Baseline conditions In order to evaluate the impacts of the proposed alternatives and weigh the tradeoffs between the alternatives, it is necessary to have a clear picture of the current conditions. The BLM therefore must present in the EIS an accurate portrayal of the current condition of its rangelands including observed trends and external forces (e.g., climate change). The BLM should utilize the most current inventory and monitoring data including public land health evaluations, allotment management monitoring data, and Rapid Ecoregional Assessments. ¹ [1: See IM 2013-082 ("BLM managers at every level of the organization should use the REA information, where appropriate, to help inform their analyses and decisions.")]] As it does so, it is important that the BLM disclose the details underlying its data and evaluations so that the public can understand the methodology and frequency of BLM's monitoring and evaluations, and understand how the information is translated into conclusory statements in the EIS.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Hank	Nevada State Grazing Board N2 District	NV	1471	9	Best available science and Baseline data	As stated by the scientific report, Improving Seeding Success on Cheatgrass-Infested Rangelands in Northern Nevada by Clements et. al. (2017), the best-known suppress ion method of invasive annuals and associated fuels is through establishment of perennial species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	4	Best available science and Baseline data	Also, BLM must disclose relevant science related to biodiversity and its rangelands. For instance, the BLM must disclose the number, type, distribution, and degree of imperilment of species a) whose home ranges and/or designated critical habitat overlap with BLM rangelands and b) whose home ranges and/or designated critical habitat overlap with BLM rangelands and grazing has been identified by the U.S. Fish and Wildlife Service in the listing or critical habitat designation notices as a threat. In doing so, the BLM should be sure to utilize state wildlife action plans, US Geological Survey species GAP data [3: https://www.usgs.gov/core-science-systems/science-analytics-and-synthesis/gap/science/species], and US Fish and Wildlife Service's data and findings for listed species articulated in, for instance, species recovery plans, five-year reviews, and species listing decisions available at US Fish and Wildlife's ECOS website.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	8	Best available science and Baseline data	All underlying data, assumptions, and scientific analysis used to support the models BLM applies to grazing and FRH processes and veg treatments must be provided as part of this EIS.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Skinner	Robert	Skinner Ranches, Inc	OR	1012	4	Best available science and Baseline data	All references to monitoring. Should require quantitative based data. Too often now the monitoring is very subjective. We must rely on real data that is scientific and verifiable. The Society of Range Management embraces quantitative monitoring of the rangelands.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	36	Best available science and Baseline data	A selection of science showing the effects of managed grazing include Davies et al. 2009 and Davies et al. 2010, which both demonstrated through field research that managed grazing can increase the resiliency of sagebrush habitats, reduce the risk and severity of wildfire, and decrease the risk of exotic weed invasion. Exclusion of livestock and implementation of moderate grazing over a >70 year period in sagebrush steppe plant communities resulted in essentially the same plant community, other than a buildup of fine fuels in the non-grazed areas (Davies et al. 2009). In the absence of fire, well-managed livestock grazing and long-term grazing exclusion produced similar plant community composition, productivity, and densities
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	16	Best available science and Baseline data	A principle to be considered in the revision of these regulations should be a requirement that grazing decisions be based on science and supported by data collected on measurable, quantifiable attributes over time.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	26	Best available science and Baseline data	There must be a comprehensive and careful evaluation of sensitive species habitat needs, and systematic baseline inventories so BLM can understand what species are present in the project area and surrounding lands, and take a candid hard look at where, and how, the project may impact these sensitive species, and the full spectrum of habitat restoration needs for these species. BLM must provide a detailed assessment of many important and rapidly declining migratory bird and other sensitive species habitat needs. It must take a hard science-based look at how intensive grazing and other management activities will impact these species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	18	Best available science and Baseline data	BLM must provide detailed monitoring data, actual use data, permitted use, compliance records and current land health assessment data so that a fair consideration of the full effects of grazing, and so that the proposals' full range of direct, indirect and cumulative threats to species habitat and to conservation and recovery of native vegetation communities can be fully understood.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	12	Best available science and Baseline data	BLM must provide detailed mapping and analysis of all sites where TG has already taken place, been authorized, is contemplated and is foreseeable. Please provide full and complete current cheatgrass/medusahead mapping at present, vs. when projects were initiated.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	LaRue	Ed	Desert Tortoise Council Ecosystems Advisory Committee		1504	1	Best available science and Baseline data	As explained in our cover letter, which is the only attached Word document, we feel compelled to provide the attached 10 PDF comment letters as new scoping comments for your consideration in this Draft EIS on grazing regulations. Even where the BLM has previously considered our input, we feel that the precipitous declines in Agassiz's desert tortoise throughout its listed range qualify as "changed circumstances" since the comment letters were originally submitted. Our concerns for each of the projects addressed in the attachments have only increased with the concomitant decreases in tortoises throughout its range.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	32	Best available science and Baseline data	23 Stade, K. 2020. America's rangelands deeply damaged by overgrazing. Figures show vast areas failing BLM's own rangeland health standards. Public Employees for Environmental Responsibility (PEER) Press release 5 March 2020 24 BLM. 2019. Tri-state Fuel Breaks Project Draft Environmental Impact Statement DOI-BLM-ID-B000-2015-0001-EIS 25 Google Earth image: ID-BOD-GAR6 Soulthsim 8-16-2011 0000. 26 Wuerthner, G. 2018. The Targeted Grazing Scam. East Oregonian. 27 Moritz, M, John Keely, E. Johnson, and A/ Schaffner. 2004. Testing a basic assumption of shrubland management: how important is fuel age?. Front Ecol. Environ. 2(2) 76-72 28 BLM. 2020. Eplanning https://eplanning.blm.gov/epl-frontoffice/eplanning/planAndProjectSite.do?methodName=renderDefaultPlanOrProjectSite&projectId=1500093 29 Western Watersheds Project v. Kraayenbrink, 2009. 30 BLM. 2013. Instruction Memorandum No. 2013-094, 03/26/2013. Resource Management During Drought 31 Executive Office of the President. 2004. Final Information Quality Bulletin for Peer Review 32 5 CFR Section 2635.501 33 Braun, C. 2006. A Blueprint for Sage-grouse Conservation and Recovery. Grouse Inc. Tucson, Arizona
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	10	Best available science and Baseline data	22 Shinneman, D.J., Aldridge, C.L., Coates, P.S., Germino, M.J., Pilliod, D.S., and Vaillant, N.M., 2018, A conservation paradox in the Great Basin-Altering sagebrush landscapes with fuel breaks to reduce habitat loss from wildfire: U.S. Geological Survey Open-File Report 2018-1034, 70 p., https://doi.org/10.3133/ofr20181034 .
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Depoali	Ed			1420	4	Best available science and Baseline data	2. Consultation, cooperation and coordination are more than words. * All knowledge should be put to use, including that from scientists at land grant colleges as well as native knowledge by people who have decades of observation and experience regarding what is really happening. * Confrontation cannot replace cooperation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Rama			1191	3	Best available science and Baseline data	We as land owners should have the ability to manage public lands the way they need to be managed without having to wait decades for those actions to be approved. The best available science and direct, on-the-ground observations need to be a stronger guiding force in the NEPA process and that AUM reductions be the last resort when it comes to altered management practices.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	62	Best available science and Baseline data	TREVES, Adrian, Wallace, Robert D., Daughon Treves, Lisa and Morales, Andrea (2006). 'Co- Managing Human-Wildlife Conflicts: A Review', Human Dimensions of Wildlife, 11: 6, 383 -396. Treves, Adrien, M. Krofel, J. McManus, 2016. Predator control should not be a shot in the dark. Frontiers in Ecology and the Environment, 14(7): 380-388. Available at: https://predatordefense.org/agencies/docs/research_PredatorControlShouldNotBeShotInDark_Treves_9-1-16.pdf . US Department of Agriculture, 2019. Census of Agriculture, United States Summary and State Data Volume 1. Geographic Area Series, Part 51 AC-17-A-51. Issued April 2019. Available at: https://www.nass.usda.gov/Publications/AgCensus/2017/Full_Report/Volume_1,_Chapter_1_US/usv1.pdf . US Environmental Protection Agency. 1994. Background for NEPA Reviewers: Grazing on Federal Lands. Washington DC. February 1994. https://www.epa.gov/sites/production/files/2014-08/documents/grazing-federal-lands-pg.pdf . van Eeden, L.M., Crowther, M.S., Dickman, C.R., Macdonald, D.W., Ripple, W.J., Ritchie, E.G. & Newsome, T.M. (2018b). Managing conflict between large carnivores and livestock. Conserv. Biol., 32, 26-34. https://euanritchie.files.wordpress.com/2017/06/eeden_et_al-2017- conservation_biology.pdf van Eeden, L.M., Eklund, A., Miller, J.R.B., Vincent Lopez-Bao, J., Chapron, G., Cejtin, M.R., Crowther, M.S., Dickman, C.R., Frank, J., Krofel, M., Macdonald, D.W., McManus, J., Meyer, T.K., Middleton, A.D., Newsome, T.M., Ripple, W.J., Ritchie, E.G., Schmitz, O.J., Stoner, K.J., Tourani, M. & Treves, A. (2018a). Carnivore conservation needs evidence-based livestock protection. PLOS Biol., 16, e2005577. https://journals.plos.org/plosbiology/article?id=10.1371/journal.pbio.2005577 Van Lanen, Nicholas, Adam w. Green, Taylor R. Gorman, Laura A. Quattrini, David C. Pvlacky, Jr. 2017. Evaluating efficacy of fence markers in reducing greater sage-grouse collisions with fencing. Biological Conservation, Volume 213, Part A, September 2017, Pages 70-83. Vavra, Marty, Catherine G. Parks and Michael Wisdom. "Biodiversity, exotic plant species, and herbivory: The good, the bad, and the ungulate." (2007). Walsberg, G.E. (2005) Cattle grazing in a national forest greatly reduces nesting success in a ground-nesting sparrow. Condor 107, 714-716. https://www.researchgate.net/publication/232660749_Cattle_grazing_in_a_national_forest_greatly_reduces_nesting_success_in_a_ground-nesting_sparrow Westbrook, C.J., Cooper, D.J. and Baker, B.W. 2010. Beaver assisted river valley formation. River Research and Applications. 27: 247-256. https://onlinelibrary.wiley.com/doi/pdf/10.1002/rra.1359 Westbrook, C.J., D.J. Cooper, and B.W. Baker.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	1	Best available science and Baseline data	To help ensure quality, informed decision-making, the BLM must employ the best available scientific information in its analysis of proposed new grazing regulations and their potential effects on the environment
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Hank	Nevada State Grazing Board N2 District	NV	1471	10	Best available science and Baseline data	The Medusahead Management Guide for the Western United States (Kyser et.al. 201 4) indicates any introduced plant mater ials are generally less expensive than native species, have higher establishment rates, germinate more quickly, and are ultimately more competitive with annuals compared to natives.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	14	Best available science and Baseline data	The BLM's proposed "exploration" of these purported beneficial uses of livestock grazing must take fully into account the science pertaining to the influence of livestock disturbance on wildfire, invasive weeds, and rangeland conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rose	Brent	Northwest Utah Grazing Advisory Board	UT	848	4	Best available science and Baseline data	The BLM needs to consider the positive impacts that vegetation treatment and reseeding have on vegetative health. Research shows that the removal of pinyon-juniper encroachment reduces runoff and erosion (Pierson et al. 2007; 2010) and increases soil water availability (Roundy et al. 2014). Additionally, pinyon-juniper removal increases vegetative cover (Jameson 1966; Miller et al. 2000; Petersen et al. 2009; Skousen et al. 1989), forage production (Bates et al. 2000; Clary and Jameson 1981; Coultrap et al. 2008), and species diversity (Miller et al. 2000). Finally, pinyon-juniper encroachment removal can have positive effects on wildlife (Albert et al. 1994; Holmes et al. 2017; O'Meara et al. 1981; Short and McCulloch 1977) and big game species (Albert et al. 1994; Dyke and Darragh 2006; Skousen et al. 1989). Pierson, F. B., Bates, J. D., Svejcar, T. J., and Hardegree, S. P. 2007. Runoff and Erosion After Cutting Western Juniper. Rangeland Ecology and Management 60 (3): 285-292. Pierson, F. B., Williams, J. C., Kormos, P. R., Hardegree, S. P., Clark, P. E., Rau, B. M. 2010. Hydrologic Vulnerability of Sagebrush Steppe Following Pinyon and Juniper Encroachment. Rangeland Ecology Management 63:614-629. Roundy, B. A., Young, K., Cline, N., Hulet, A., Miller, R. F., Tausch, R. J., Chambers, J. C., and Rau, B. 2014. Pinon-Juniper Reduction Increases Soil Water Availability of the Resource Growth Pool. Rangeland Ecology and Management 67 (5): 495-505. Jameson, D. A. 1966. Pinyon-Juniper Litter Reduces Growth of Blue Grama. Journal of Range Management 1: 214-217. Miller, R. F., Svejcar, T. J., and Rose, J. A. 2000. Impacts of Western Juniper on Plant and Community Composition and Structure. Journal of Range Management 53 (6): 574-585. Petersen, S. L., Stringham, T. K., Roundy, B. A. 2009. A Process-Based Application of State-and-Transition Models: A Case Study of Wester Juniper (Juniperus occidentalis) Encroachment. Rangeland Ecology Management 62:186-192. Skousen, J. G., Davis, J. N., and Brotherson, J. D. 1989. Pinyon-Juniper Chaining and Seeding for Big Game in Central Utah. Journal of Range Management 42 (2): 98-103. Bates, J. D., Miller, R. F., and Svejcar, T. J. 2000. Understory Dynamics in Cut and Uncut Western Juniper Woodlands. Journal or Range Management 53: 119-126. Clary W. P. and Jameson, D. A. 1981. Herbage Production Following Tree and Shrub Removal in the Pinyon-Juniper Type of Arizona. Journal of Range Management 34 (2): 109-113. Coultrap, D. E., Fulgham, K. O., Lancaster, D. L., Gustafson, J., Lile, D. F., George, M.R. 2008. Relationships Between Western Juniper (Juniperus Occidentalis) and Understory Vegetation. Invasive Plant Science Management 1 (1): 3-11. Albert, S. K., Luna, N., Chopito, A. L. 1994. Deer, Small Mammal, and Songbird Use of Thinned Pinon-Juniper Plots: Preliminary Results. USDA Forest
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	7	Best available science and Baseline data	The agency must consider the recent paper by Williamson, et al. (2019) ⁸ that concludes, - contrary to the wishful thinking that "Grazing Prevents Blazing" - "Our novel time-series data and results indicate that grazing corresponds with increased cheatgrass occurrence and prevalence regardless of variation in climate, topography, or community composition, and provide no support for the notion that contemporary grazing regimes or grazing in conjunction with fire can suppress cheatgrass." Id. (emphasis added).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	11	Best available science and Baseline data	Synergistic feedback between invasive grasses, and increased fire frequency and size, has reduced sagebrush shrub cover and plant diversity, and resulted in type conversions from sagebrush steppe ecosystems to non-native grassland landscapes (Davies 2011; Davies et al. 2011). Remaining sagebrush landscapes are threatened further by exotic plant invasions that can lead to altered fire regimes and conversions to unsuitable expanses of exotic annual grasslands (Chambers et al. 2007; Miller et al. 2011; Balch et al. 2013). Knick et al. (2013) reported that long-term effects of changing climate could result in further loss of sagebrush by the end of this century. As much as 80% of the current sagebrush distribution could disappear under extreme projections (Neilson et al. 2005). However, the BLM failed to consider climate change and its impact on the planning area. While the Great Old Broads for Wilderness acknowledge part of the impacts to soils and native vegetation have been caused by large wildfires, BLM's own studies show that livestock grazing and motorized vehicles are the largest contributors to alteration of native vegetation in the sagebrush steppe ecosystem (U.S. Department of the Interior 2018). Invasive annual grasses are driving more frequent and intense wildfires, which reduce the extent and quality of sage-grouse habitat (Brooks and Pyke 2001).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Jen			1241	5	Best available science and Baseline data	Removal or reduction of livestock in fragile, arid desert conditions. See: https://www.gao.gov/assets/160/151345.pdf
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baumann	Jim	Nevada State Grazing Board District N-6	NV	986	6	Best available science and Baseline data	Regulations should require management decisions based on the best rangeland science and in coordination with ranchers. When issues and concerns arise, flexibility should be built in to grazing permits to allow for adaptive management and that quality and quantity of data collected can support decisions made. Regulations should ensure that before any grazing restrictions are imposed or there are any changes in livestock stocking rates or seasons of permitted use, every feasible option is probed, including, but not limited to the following: Identify and implement all economically and technically feasible livestock distribution, forage production enhancement, weed control programs, prescribed grazing systems, off-site water development by water rights holder, shrub and pinyon/juniper control, livestock salting/supplemental plans, and establishment of riparian pastures and herding. Impacts on property rights of inholders and adjacent private land owners should be considered before any grazing management actions or strategies are instituted. Potential impacts of such actions on grazing animal health and productivity should be studied.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	42	Best available science and Baseline data	Regarding livestock grazing of meadows and riparian areas, the use of livestock as a tool for meadow enhancement is well documented in literature. Studies in Nevada by Neel (1980), Klebenow (1982), and Evans (1986) concluded that cattle grazing can be used to stimulate forb production and that sage grouse tended to prefer grazed meadows. These studies were all conducted in Nevada, focusing on livestock use of upland meadows frequented by sage-grouse and reported that sage- grouse use of moderately grazed meadows was higher than their use of both ungrazed meadows and heavily grazed meadows. Oakleaf (1971) acknowledged that grazing should be used as a tool for meadow enhancement

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ruch	Jeff	PEER		1131	6	Best available science and Baseline data	PEER urges BLM to rectify this glaring omission and incorporate independent peer-reviewed analysis of all empirical claims about this vast livestock grazing program.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	33	Best available science and Baseline data	Other grazing references that require consideration in development of the regulations includes: Bates, J. D., E. C. Rhodes, K. W. Davies, and R. Sharp. 2009. Postfire succession in big sagebrush steppe with livestock grazing. Rangeland Ecology & Management 62:98-110. -Beck, J. L., and D. L. Mitchell. 2000. Influences of livestock grazing on sage grouse habitat. Wildlife Society Bulletin 28:993-1002. -Briske, D. D., J. D. Derner, J. R. Brown, S. D. Fuhlendorf, W. R. Teague, K. M. Havstad, R. L. Gillen, A. J. Ash, and W. D. Willms. 2008. Rotational grazing on rangelands: reconciliation of perception and experimental evidence. Rangeland Ecology & Management, 61: 3-17. -Courtois, D.R., B.L. Perryman, and H.S. Hussein. 2004. Vegetation changes after 65 years of grazing exclusion. Journal of Range Management 57:574-582. -Davies, K. W., J. D. Bates, T. J. Svejcar, and C. S. Boyd. 2010. Effects of long-term livestock grazing on fuel characteristics in rangelands: an example from the sagebrush steppe. Rangeland Ecology & Management 63:662-669. -Davies, K. W., C. S. Boyd, J. L. Beck, J. D. Bates, T. J. Svejcar, and M. A. Gregg. 2011. Saving the sagebrush sea: an ecosystem conservation plan for big sagebrush plant communities. Biological Conservation 144:2573-2584. -Davies, K. W., T. J. Svejcar, and J. D. Bates. 2009. Interaction of historical and nonhistorical disturbances maintains native plant communities. Ecological Applications 19:1536-1545. -Evans, C. C. 1986. The relationship of cattle grazing to sage grouse use of meadow habitat on the Sheldon National Wildlife Refuge. M. S. Thesis, University of NV, Reno. 199 p. -Holechek, J. L., and T. Stephenson. 1983. Comparison of big sagebrush vegetation in north central New Mexico under moderately grazed and grazing excluded conditions. Journal of Range Management 36: 455-456. -Johnson, T. N., P. L. Kennedy, T. DelCurto, and R. V. Taylor. 2011. Bird community responses to cattle stocking rates in a Pacific Northwest bunchgrass prairie. Agriculture, Ecosystems, and Environment 144: 338-346. -Klebenow, D.A. 1982. Livestock grazing interactions with sage grouse. Pages 113-123 in: J.M. Peek and P.D. Dalke, editors. Proceedings of the Wildlife-livestock Symposium, 20-22 April 1981, Coeur d'Alene, Idaho. Proceeding 10, University of Idaho Forestry, Wildlife, and Range Experiment Station, Moscow, ID. -Klebenow, D.A. 1985. Habitat management of sage grouse in Nevada. World Pheasant Association Journal 10:34-46. -Klebenow, D. A. 2001. Enhancing sage-grouse habitat: a Nevada landowner's guide. Nevada Wildlife Federation, Inc. Northwest Sage-grouse Working Group Publication. Reno, NV. 13 p. -Knopf, F. L. 1996. Perspectives on grazing nongame bird habitats. Pages 51-59 in: P.R. Krausman, editor. Rangeland Wildlife. Denver (CO): Society for Range Management. -Laycock. 1967. How heavy grazing and
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	10	Best available science and Baseline data	Numerous studies document the impacts of livestock grazing as one of the largest contributors to alteration of native vegetation in the sagebrush steppe ecosystem. Extensive scientific literature has confirmed that livestock grazing adversely affects sagebrush ecosystems. Knick et al. (2003) reported the lower resilience of sagebrush plant communities to grazing. Mack and Thompson (1982) discuss the myriad harmful effects of livestock grazing to intermountain and Great Basin sagebrush communities that evolved without large herds of hooved mammals. Fleischner (1994) and Belsky and Gelbard (2000) reviewed the many harmful impacts of livestock grazing to arid western lands, including alteration of plant community composition and structure. Anderson and Holte (1981) describe significant increases in perennial grass and shrub cover after grazing was removed from sagebrush lands in southeastern Idaho- perennial grass cover increased exponentially and shrub cover was 154 percent greater.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	DeSoto	Randi	Summit Lake Paiute Tribe	NV	883	8	Best available science and Baseline data	Instead of expediting grazing authorizations in order to improve rangeland conditions andlor as a tool to reduce wildfire, we propose that current science-based methods such as those outlined by the Conservation Effects Assessment Project (CEAP) (Briske 2011) become prioritized and widely utilized. The CEAP is responsible for assessing and reporting on the effects of conservation practices provided through Farm Bill programs. Results from CEAP-Grazing Land projects thus guide conservation planning and policy by providing rangeland managers with supplementary resources for successful management of soil, water, air, plant, animal, and economic resources (Metz and Rewa 2019).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	3	Best available science and Baseline data	In addition, the BLM must disclose relevant science around climate change and current condition of its rangelands. This includes, for instance, how extreme weather patterns (e.g., drought, extreme storms) attributable to climate change have affected and are affecting grazing operations and rangeland conditions, and how grazing affects soil carbon (e.g., see Meyer 2011).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	9	Best available science and Baseline data	In 1999 funds were appropriated through the Nevada Legislature to create a Nevada Public Land Grazing Database and Economic Analysis. In 2000, the Nevada State Department of Agriculture asked the Nevada Association of Counties to assist in fulfilling this mandate. Resource Concepts, Inc. was contracted to help complete the database and analysis. The product of this effort is the report, Nevada Grazing Statistics Report and Economic Analysis for Federal Lands in Nevada (Resource Concepts, Inc. March 26, 2001). Table 3 of the Report (p. 48) summarizes the economic impacts of 1 AUM of grazing in Nevada as follows: [SEE ATTACHMENT FOR TABLE 3. Economic Impacts of 1 AUM of Grazing in Nevada] Basically, for every AUM lost (or gained), the overall impact to the livestock producer himself in one year equaled \$29.40 (in 1999 dollars) in one year. However, to value an AUM in 2020 dollars there must be adjustments based on inflationary changes since 1999. Take the following as an example. The Bureau of Labor Statistics reports an average inflation rate over the past 40+ years (since 1976) to be about 3% per year. Applying a rate of 3% each year since 1999 gives a 2020 value of one AUM to the producer alone at about \$55 per year and \$100 per year to the local economy. What is critical to understand is that AUM loss if typically forever. Forage/AUM loss impacts do not occur to ranchers and local economies as a one-time impact. If AUMs are diminished (or gained), the economic loss (or gain) occurs year-after-year.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	5	Best available science and Baseline data	Further, as part of the baseline discussion, the BLM must discuss the current status of the grazing program and directly related activities such as predator control programs. For example, the BLM should disclose all the financial information associated with its grazing program - e.g., the cost of administering the grazing program; the Bureau's capacity to conduct meaningful program-wide rangeland inventory, monitoring, and evaluation and allotment monitoring; the revenues generated by the program and how they are distributed; a comparison of grazing fees on public lands and private lands; and the costs and revenues associated with programs and activities within [4: e.g., expenditures by the wildlife program that are devoted to projects within grazing allotments designed to mitigate adverse impacts to rangelands and especially sensitive vegetation communities (e.g., riparian habitats).] or external [5: e.g., Wildlife Services predator control activities.] to the BLM that contribute to BLM's grazing program. See Glaser et al. (2015) for a detailed exploration of the costs associated with the BLM grazing program.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spotts	Richard		UT	1235	4	Best available science and Baseline data	For example, please see the scientific study reference and related abstract pasted in below: Fire, livestock grazing, topography, and precipitation affect occurrence and prevalence of cheatgrass (Bromus tectorum) in the central Great Basin, USA * Matthew A. Williamson,
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baumann	Jim	Nevada State Grazing Board District N-6	NV	986	2	Best available science and Baseline data	Current rangeland science should be relied upon for grazing regulations. Ecological Site Descriptions (ESD) and their associated State and Transition Models/Disturbance Response Groups should be used, where available, to inform objectives and differing levels of grazing allowed. Understanding ecological shifts and transitions that occur due to disturbances such as wildfire or legacy management are imperative in order to frame management objectives under any grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	45	Best available science and Baseline data	Chambers et al 2016 discussed resistance and resilience in a 2016 paper - stating that drought, "inappropriate" grazing (i.e. the type of grazing that will take place under TG, OBG, flexibility, streamlining), degradation, weeds, and climate change reduce ecological resistance and resilience. http://integratedrangelandfiremanagementstrategy.org/wpcontent/uploads/2016/10/IRFMS_Actionable_Science_Plan.pdf
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Knapp	Gregory		CO	1055	5	Best available science and Baseline data	Bureau of Economic Analysis. 2019. Local Area Gross Domestic Product, 2018. News Release. December 2019. The Colorado River Compact, 1922. Colorado State University. 2017. Seasonal Water Needs and Opportunities for Limited Irrigation for Colorado Crops. Colorado State University Extension Fact Sheet 4.718. Updated February 2017. Congressional Record, 18 April 1955. 4542-4568, 4573-4580. Government Printing Office. 18 April 1955. Edwards C. and Hill P.J. 2012. Cutting the Bureau of Reclamation and Reforming Water Markets. DownsizingGovernment.org aproject of the Cato Institute. February 2012. Lilley II, William and Gould, Lewis L. The Western Irrigation Movement 1878-1902: A Reappraisal in The American West: A Reorientation, Gressley, Gene M Editor; Laramie: University of Wyoming Publications, 1966. Reisner, Marc. Cadillac Desert. New York: Penguin Books, 1986. Robinson, Michael. Water for the West. Chicago: Public Works Historical Society, 1979. United States Department of Agriculture. 2008. Montana Grazing Animal Unit Month (AUM) estimator. Natural Resources Conservation Service Range Technical Note No. MT-32 (Rev. 2) September 2008. United States Department of Agriculture. 2017. Cattle 2017. National Agricultural Statistics Service. July 2017.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	3	Best available science and Baseline data	BLM's notice indicates the agency may consider how to use livestock to improve "rangeland conditions." 85 Fed. Reg. 3411. There is little or no scientific basis for grazing as a "tool" for improving ecosystem health. The agency must ensure that grazing management practices are accurately described and their environmental impacts thoroughly considered in its EIS. Any proposed methods to "improve conditions" must be supported by the best available published and peer-reviewed science. Likewise, BLM must disclose and discuss the significant scientific literature that cuts against any "improve conditions" proposals. Programs and practices that include controversial, scientifically unsupported treatments must include rigorous, scientifically sound monitoring and reporting mechanisms to determine treatment efficacy and inform future decision making processes.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	9	Best available science and Baseline data	BLM must provide info on the ecological condition of lands and land compliance with the FRH before wild fires, and how this may have impacted the presence of cheatgrass and other weeds following fires. Where have fires burned lands found to be in compliance with the FRH? Where has there been no current FRH? The condition of lands prior to a fire often determines how effective recovery will be and helps to limit cheatgrass/medusahead dominance following fires and other disturbances. This means that BLM must provide full and detailed data and analysis of current land health and actual on the ground ecological conditions and factors such as a plethora of livestock facilities and high stocking levels that are causing expanded cheatgrass, weeds and degradation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	9	Best available science and Baseline data	Beschta et al. (2013) conducted an environmental review of 157 papers and journals on the impacts of livestock grazing on a variety of natural resources and concluded that "Historical and contemporary livestock production-the most widespread and long-running commercial use of public lands-can alter vegetation, soils, hydrology, and wildlife species composition and abundances in ways that exacerbate the effects of climate change on these resources." Beschta et al. (2013) recommended that "Although many of these consequences have been studied for decades, the ongoing and impending effects of ungulates in a changing climate require new management strategies for limiting their threats to the long-term supply of ecosystem services on public lands. Removing or reducing livestock across large areas of public land would alleviate a widely recognized and long-term stressor and make these lands less susceptible to the effects of climate change."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	O'Brien	Mary	Grand Canyon Trust	UT	1361	1	Best available science and Baseline data	Attachments: Bergstrom 2017 carnivore coexistence.pdf; Curtin_rest and restoration_2002.pdf; Gates 2012 Land Use and Fences -pronghorn.pdf; Forrester et al 2017 grazing restoration.pdf; Holechek_grazing_studies_what_we_have_learned_highlighted.pdf; Moreira-Arce et al 2018 Management-Tools-to-Reduce-Carnivore Livestock-Conflicts.pdf; Holechek_An approach for Setting stocking rate_1988.pdf; Myers et al 2017 grazing water quality.pdf; Galt et al. 2000 Grazing capacity and stocking rate.pdf; Hanophy FencingWithWildlifeInMind 2009.pdf
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	2	Best available science and Baseline data	As part of this effort, the BLM must incorporate, evaluate, and analyze the data presented in 2014 by the Public Employees for Environmental Responsibility (PEER). PEER collated nationally rangeland health data to show that as of 2012 16% of allotments (29% of total allotment area), have failed to meet standards due to livestock grazing. PEER also found that between 1997 and 2012 there was a net improvement in allotment land health standards status conditions of only 2%. See https://www.peer.org/blm-grazing-data/ for the methodology utilized by PEER and the resultant interactive map
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	5	Best available science and Baseline data	1 Davies, K. W., Svejcar, T. J., Bates, J. D. 2009. Interaction of Historical and Nonhistorical Disturbances Maintains Native Plant Communities. Ecological Applications 19 (6): 1536- 1545. Available online: http://onlinelibrary.wiley.com/doi/10.1890/09-0111.1/abstract 2 Diamond, J. M., Call, C. A., and Devoe, N. 2009. Effects of targeted Cattle Grazing on Fire Behavior of Cheatgrass-dominated Rangeland in the Northern Great Basin, USA. International Journal of Wildland Fire 18: 944-950. Available online: https://www.fs.fed.us/rm/pubs/rmrs_gtr292/2009_diamond.pdf

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	31	Best available science and Baseline data	1-15 U.S.C. 1702 Section 105 (c) Definitions, Multiple Use. (ii) Sustained Yield 2 Coggins. 1702. Of Succotash Syndromes and Vacuous Platitudes: The Meaning of "Multiple Use, Sustained Yield" for Public Land Management. Coggins passed away in September of 2019. 3 BLM. 1999. Technical Reference 1734-3, Utilization Studies and Residual Measurements. Quantitative methods Paired Plot method. 4 Catlin, J., J. Carter, and A. Jones. 2010. Range management in the face of climate change. In Monaco, Thomas et al. comps. 2011. Proceedings-Threats to Shrubland Ecosystem Integrity; 2010 May 18-20; Logan, UT. Natural Resources and Environmental Issues, Volume XVII. S.J. and Jessie E. Quinney Natural Resources Research Library, Logan Utah, USA. https://search.proquest.com/openview/063681500e7c016deda366c8a467fca5/1?pqorigsite=gscholar&cbl=606295 5 43 CFR 4180.2 Standards and guidelines for grazing administration. 6 Sec. 4180.2 Standards and guidelines for grazing administration. 7 Ehrlich, P and A Ehrlick. 1981. Extinction: the causes and consequences of the disappearance of species - repository.library.georgetown.edu McNaughton, S. 1977. Diversity and stability of ecological communities: a comment on the role of empiricism in ecology -The American Naturalist, - journals.uchicago.edu McNaughton, S. J. 1993 in Biodiversity and Ecosystem Function (ed.s Schulze, E. D. & Mooney, H. A.) 361-384 (Springer, Berlin) Tilman, D and J Downing. 1994. Biodiversity and stability in grasslands , Nature May, R. 1973. Stability and Complexity in Model Ecosystems (Princeton Univ. Press) Goodman, D. 1975. The theory of diversity-stability relationships in ecology. The Quarterly Review of Biology. King, A. and S. Pimm. 1983. Complexity, diversity, and stability: a reconciliation of theoretical and empirical results. The American Naturalist, 1983 Pimm, S. 1984. The complexity and stability of ecosystems. Nature. 8 Ewel J, M Mazzarino, C Berish. 1991. Tropical soil fertility changes under monocultures and successional communities of different structure. Ecological Applications Vitousek P, D Hooper, E Schulze, and H Mooney. 1993. Biodiversity and ecosystem function Ehrlich, P, HA Mooney. 1983. Extinction, substitution, and ecosystem services. BioScience Swift, M, and J Anderson. 1994. Biodiversity and ecosystem function in agricultural systems Swift M, J Anderson. 1994. Biodiversity and ecosystem function 9 Crested wheatgrass, Agropyron cristatum, in nonnative (introduced) species often favored as livestock forage. It is more vulnerable to drought than native perennial grasses. 10 BLM. 2018. Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Bureau of Land Management. 11 BLM. 2015. Range Inventory and Monitoring Evaluation Report, RIME Table 7
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	7	Best available science and Baseline data	The direct and induced benefits of the livestock industry in Eureka County can be determined based upon information contained in the University of Nevada Report: Reno Technical Report UCED 2005/06-14 Updated Economic Linkages in the Economy of Eureka County. The livestock sector in Eureka County has a final demand multiplier of 2.0283. In short this means that for every \$1 generated by the sector Eureka County's economy will benefit \$2.02 of total revenue. The high final demand multiplier suggests strong economic linkages of the livestock sector to other sectors of the county's economy. Income and employment multipliers are also of importance. The livestock sector has an income multiplier of 1.6812 and an employment multiplier of 1.4439. Thus, for every \$1 generated by livestock production, total county household income increases by \$1.68 and for every job added by the livestock sector, total employment in Eureka County increases by 1.44 employees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	16	Best available science and Baseline data	See http://www.taxpayer.net/user_uploads/file/factsheet_Grazing_Fiscal_Costs(3).pdf

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	17	Best available science and Baseline data	I require the public be informed via the EIS of the average AUM livestock grazing payment costs in the private segment of livestock grazing verses the current public lands payment. For your convenience, here is the data: What is the average paid per month per Animal Unit (AUM) in 2018 in the REAL world? Lowest is \$9.50 (Nevada) to highest \$46.00 (Nebraska) BLM charges \$1.35 (2020) !!! Per the Oregon Annual Stats Bulletin page 15 https://www.nass.usda.gov/.../Annual.../2019/OR_ANN_2019.pdf
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	63	Best available science and Baseline data	<p>References (all articles submitted with comments) Ammon, D. W., S. D. Funnell, and R. G. Hammon. 2011. The role of herbivores in Great Plains conservation: comparative ecology of bison and cattle. Ecosphere 2(3):art26. doi:10.1890/ES10- 00152.1 Ammon, E.M. & Stacey, P .B. 1997. Avian nest success in relation to past grazing regimes in a montane riparian system. Condor 99, 7-13. Bailey, Derek, Jeffrey C. Mosley, Richard E. Estell, Andres F. Cibils, Marc Horney, John R. Hendrickson, John W. Walker, Karen L. Launchbaugh, Elizabeth A. Burritt. 2019. Rangelands, Volume 41, Issue 6, December 2019, Pages 258-259. https://www.sciencedirect.com/science/article/pii/S1550742419300399. Bartel, R.A., N.M. Haddad, and J.P. Wright. 2010. Ecosystem engineers maintain a rare species of butterfly and increase plant diversity. Oikos. 119: 883-890. https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1600-0706.2009.18080.x Belnap, J. 2003. The world at your feet: desert biological soil crusts. Frontiers in Ecology and the Environment, 1(4): 181-189. https://www.researchgate.net/publication/271694868_The_World_at_Your_Feet_Desert_Biological_Soil_Crusts Bergstrom, Bradley and Lily C. Arias, Ana D. Davidson, Adam W. Ferguson, Lynda A. Randa, and Steven R. Sheffield. 2014. License to Kill: Reforming Federal Wildlife Control to Restore Biodiversity and Ecosystem Function. Conservation Letters, March/April 2014, 7(2), 131-142. Bergstrom, Bradley. 2017. Carnivore conservation: shifting the paradigm from control to coexistence. Journal of Mammalogy, Volume 98, Issue 1, 8 February 2017, Pages 1-6, https://doi.org/10.1093/jmammal/gyw185. Bird, B., M. O'Brien, M. Petersen. 2011. Beaver and Climate Change Adaptation in North America: A Simple, Cost-Effective Strategy. WildEarth Guardians. September. 2011. https://pdf.wildearthguardians.org/site/DocServer/Beaver_and_Climate_Change_Final.pdf Bowker, M.A., J. Belnap, V. Bala Chaudhary, N.C. and Johnson. 2008. Revisiting classic water erosion models in drylands: The strong impact of biological soil crusts. Soil Biology and Biochemistry, 40(9): 2309-2316. http://doi.org/10.1016/j.soilbio.2008.05.008. Butler, D.R. and G.P. Malanson. 1995. Sedimentation rates and patterns in beaver ponds in a mountain environment. Geomorphology. 13: 255-269. ftp://nris.mt.gov/public/Maxell/Beaver/Butler,%20D.R.%20and%20G.P.%20%20Malanson.%20%201995.%20%20Sedimentation%20rates%20and%20patterns%20in%20beaver%20ponds%20in%20a%20mountain%20environment.%20%20Geomorphology.pdf Condon, L., and Pyke, D.A. 2018. Fire and grazing influence site resistance to Bromus tectorum through their effects on shrub, bunchgrass</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	66	Best available science and Baseline data	<p>References (Full articles submitted with comments) Ammon, D. W., S. D. Farnsworth, and R. G. Hamilton. 2011. The role of herbivores in Great Plains conservation: comparative ecology of bison and cattle. Ecosphere 2(3):art26. doi:10.1890/ES10- 00152.1 Ammon, E.M. & Stacey, P .B. 1997. Avian nest success in relation to past grazing regimes in a montane riparian system. Condor 99, 7-13. Bailey, Derek, Jeffrey C. Mosley, Richard E. Estell, Andres F. Cibils, Marc Horney, John R. Hendrickson, John W. Walker, Karen L. Launchbaugh, Elizabeth A. Burritt. 2019. Rangelands, Volume 41, Issue 6, December 2019, Pages 258-259. https://www.sciencedirect.com/science/article/pii/S1550742419300399. Bartel, R.A., N.M. Haddad, and J.P. Wright. 2010. Ecosystem engineers maintain a rare species of butterfly and increase plant diversity. Oikos. 119: 883-890. https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1600-0706.2009.18080.x Belnap, J. 2003. The world at your feet: desert biological soil crusts. Frontiers in Ecology and the Environment, 1(4): 181-189. https://www.researchgate.net/publication/271694868_The_World_at_Your_Feet_Desert_Biological_Soil_Crusts Bergstrom, Bradley and Lily C. Arias, Ana D. Davidson, Adam W. Ferguson, Lynda A. Randa, and Steven R. Sheffield. 2014. License to Kill: Reforming Federal Wildlife Control to Restore Biodiversity and Ecosystem Function. Conservation Letters, March/April 2014, 7(2), 131-142. Bergstrom, Bradley. 2017. Carnivore conservation: shifting the paradigm from control to coexistence. Journal of Mammalogy, Volume 98, Issue 1, 8 February 2017, Pages 1-6, https://doi.org/10.1093/jmammal/gyw185. Bird, B., M. O'Brien, M. Petersen. 2011. Beaver and Climate Change Adaptation in North America: A Simple, Cost-Effective Strategy. WildEarth Guardians. September. 2011. https://pdf.wildearthguardians.org/site/DocServer/Beaver_and_Climate_Change_Final.pdf Bowker, M.A., J. Belnap, V. Bala Chaudhary, N.C. and Johnson. 2008. Revisiting classic water erosion models in drylands: The strong impact of biological soil crusts. Soil Biology and Biochemistry, 40(9): 2309-2316. http://doi.org/10.1016/j.soilbio.2008.05.008. Butler, D.R. and G.P. Malanson. 1995. Sedimentation rates and patterns in beaver ponds in a mountain environment. Geomorphology. 13: 255-269. ftp://nris.mt.gov/public/Maxell/Beaver/Butler,%20D.R.%20and%20G.P.%20%20Malanson.%20%201995.%20%20Sedimentation%20rates%20and%20patterns%20in%20beaver%20ponds%20in%20a%20mountain%20environment.%20%20Geomorphology.pdf Condon, L., and Pyke, D.A. 2018. Fire and grazing influence site resistance to Bromus tectorum through their effects on shrub, bunchgrass</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	65	Best available science and Baseline data	<p>References (Full articles submitted with comments) Ammon, D. W., S. D. Farnsworth, and R. G. Hamilton. 2011. The role of herbivores in Great Plains conservation: comparative ecology of bison and cattle. Ecosphere 2(3):art26. doi:10.1890/ES10- 00152.1 Ammon, E.M. & Stacey, P .B. 1997. Avian nest success in relation to past grazing regimes in a montane riparian system. Condor 99, 7-13. Bailey, Derek, Jeffrey C. Mosley, Richard E. Estell, Andres F. Cibils, Marc Horney, John R. Hendrickson, John W. Walker, Karen L. Launchbaugh, Elizabeth A. Burritt. 2019. Rangelands, Volume 41, Issue 6, December 2019, Pages 258-259. https://www.sciencedirect.com/science/article/pii/S1550742419300399. Bartel, R.A., N.M. Haddad, and J.P. Wright. 2010. Ecosystem engineers maintain a rare species of butterfly and increase plant diversity. Oikos. 119: 883-890. https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1600-0706.2009.18080.x Belnap, J. 2003. The world at your feet: desert biological soil crusts. Frontiers in Ecology and the Environment, 1(4): 181-189. https://www.researchgate.net/publication/271694868_The_World_at_Your_Feet_Desert_Biological_Soil_Crusts Bergstrom, Bradley and Lily C. Arias, Ana D. Davidson, Adam W. Ferguson, Lynda A. Randa, and Steven R. Sheffield. 2014. License to Kill: Reforming Federal Wildlife Control to Restore Biodiversity and Ecosystem Function. Conservation Letters, March/April 2014, 7(2), 131-142. Bergstrom, Bradley. 2017. Carnivore conservation: shifting the paradigm from control to coexistence. Journal of Mammalogy, Volume 98, Issue 1, 8 February 2017, Pages 1-6, https://doi.org/10.1093/jmammal/gyw185. Bird, B., M. O'Brien, M. Petersen. 2011. Beaver and Climate Change Adaptation in North America: A Simple, Cost-Effective Strategy. WildEarth Guardians. September. 2011. https://pdf.wildearthguardians.org/site/DocServer/Beaver_and_Climate_Change_Final.pdf Bowker, M.A., J. Belnap, V. Bala Chaudhary, N.C. and Johnson. 2008. Revisiting classic water erosion models in drylands: The strong impact of biological soil crusts. Soil Biology and Biochemistry, 40(9): 2309-2316. http://doi.org/10.1016/j.soilbio.2008.05.008. Butler, D.R. and G.P. Malanson. 1995. Sedimentation rates and patterns in beaver ponds in a mountain environment. Geomorphology. 13: 255-269. ftp://nris.mt.gov/public/Maxell/Beaver/Butler,%20D.R.%20and%20G.P.%20%20Malanson.%20%201995.%20%20Sedimentation%20rates%20and%20patterns%20in%20beaver%20ponds%20in%20a%20mountain%20environment.%20%20Geomorphology.pdf Condon, L., and Pyke, D.A. 2018. Fire and grazing influence site resistance to Bromus tectorum through their effects on shrub, bunchgrass</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	64	Best available science and Baseline data	<p>References (Full articles submitted with comments): Ammon, D. W., S. D. Farnsworth, and R. G. Hamilton. 2011. The role of herbivores in Great Plains conservation: comparative ecology of bison and cattle. Ecosphere 2(3):art26. doi:10.1890/ES10- 00152.1 Ammon, E.M. & Stacey, P .B. 1997. Avian nest success in relation to past grazing regimes in a montane riparian system. Condor 99, 7-13. Bailey, Derek, Jeffrey C. Mosley, Richard E. Estell, Andres F. Cibils, Marc Horney, John R. Hendrickson, John W. Walker, Karen L. Launchbaugh, Elizabeth A. Burritt. 2019. Rangelands, Volume 41, Issue 6, December 2019, Pages 258-259. https://www.sciencedirect.com/science/article/pii/S1550742419300399. Bartel, R.A., N.M. Haddad, and J.P. Wright. 2010. Ecosystem engineers maintain a rare species of butterfly and increase plant diversity. Oikos. 119: 883-890. https://onlinelibrary.wiley.com/doi/abs/10.1111/j.1600-0706.2009.18080.x Belnap, J. 2003. The world at your feet: desert biological soil crusts. Frontiers in Ecology and the Environment, 1(4): 181-189. https://www.researchgate.net/publication/271694868_The_World_at_Your_Feet_Desert_Biological_Soil_Crusts Bergstrom, Bradley and Lily C. Arias, Ana D. Davidson, Adam W. Ferguson, Lynda A. Randa, and Steven R. Sheffield. 2014. License to Kill: Reforming Federal Wildlife Control to Restore Biodiversity and Ecosystem Function. Conservation Letters, March/April 2014, 7(2), 131-142. Bergstrom, Bradley. 2017. Carnivore conservation: shifting the paradigm from control to coexistence. Journal of Mammalogy, Volume 98, Issue 1, 8 February 2017, Pages 1-6, https://doi.org/10.1093/jmammal/gyw185. Bird, B., M. O'Brien, M. Petersen. 2011. Beaver and Climate Change Adaptation in North America: A Simple, Cost-Effective Strategy. WildEarth Guardians. September. 2011. https://pdf.wildearthguardians.org/site/DocServer/Beaver_and_Climate_Change_Final.pdf Bowker, M.A., J. Belnap, V. Bala Chaudhary, N.C. and Johnson. 2008. Revisiting classic water erosion models in drylands: The strong impact of biological soil crusts. Soil Biology and Biochemistry, 40(9): 2309-2316. http://doi.org/10.1016/j.soilbio.2008.05.008. Butler, D.R. and G.P. Malanson. 1995. Sedimentation rates and patterns in beaver ponds in a mountain environment. Geomorphology. 13: 255-269. ftp://nris.mt.gov/public/Maxell/Beaver/Butler,%20D.R.%20and%20G.P.%20%20Malanson.%20%201995.%20%20Sedimentation%20rates%20and%20patterns%20in%20beaver%20ponds%20in%20a%20mountain%20environment.%20%20Geomorphology.pdf Condon, L., and Pyke, D.A. 2018. Fire and grazing influence site resistance to Bromus tectorum through their effects on shrub, bunchgrass</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	O'Brien	Mary	Grand Canyon Trust	UT	1362	1	Best available science and Baseline data	<p>Attachments: ODFW_Non-lethal_Measures 2019.pdf; Public Employees for Environmental Responsibility_America's Rangelands_2020_03_05.docx; Paquet et al Mexican_Wolf_3_Year_Biological_Review 2001.pdf; Sawtooth NRA and Jerry Peak Wilderness Additions Act.pdf; santiago_avila_Killing wolves to prevent predation.pdf; Public Law 111-11.pdf; Petroelje et al wolves carcass dumps 2019.pdf; Public Law 112-74.pdf; Treves_research_PredatorControlShouldNotBeShotInDark_Treves_9-1-16.pdf; USDA-NRCS_National Range and Pasture Handbook. 1989.PDF</p>
GIS Data and Analysis								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Magill	Bobby	Bloomberg Industry Group		1312	2	GIS data and analysis	<p>Can you tell me where I can find or how I can obtain the data used to create the below map? Specifically, I'm looking for shapefile data for the grazing allotments that appear on this map. https://eplanning.blm.gov/epl-frontoffice/projects/nepa/1500093/20002559/250003032/MapOfGrazingAllotments.pdf</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wiens	Russell		WY	34	1	GIS data and analysis	It would be helpful if each office would make available on their websites any available a list of any available grazing allotments so they could be filled and better use the available allotments instead of letting them sit unused and not managed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	3	GIS data and analysis	BLM must provide comprehensive current mapping of current cheatgrass/annual grass infestation areas at all percentages of infestation so the enormity of the problem can be understood. BLM must highlight all land areas with minimal cheatgrass/annual grasses. BLM must work expeditiously to remove all grazing pressure from these areas to protect them as enclaves of biodiversity, and to protect and sustain migratory birds and a wealth of other native biota. Please provide detailed mapping and analysis of such sites and tailor grazing regulation changes to address this. This is fully in line with FLPMA's multiple use and mandate - as lands becoming overrun with flammable annual weeds due to chronic grazing disturbance, and harms and destroys other uses of public lands. Full and current detailed mapping must be provided. Please compare annual grass presence now to 10 and 20 years ago.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	40	GIS data and analysis	BLM must identify and map all areas where post-fire actions including ESR seeded sagebrush or other wildlife habitat plants.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	42	GIS data and analysis	BLM must also identify where it seeded cwg and now bases high levels of livestock use on exotic forage grass that promotes range fires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	35	GIS data and analysis	As part of this EIS, BLM must provide detailed information on the current status and trends of habitats and populations of important, sensitive and ESA-listed plant and animal species across public lands; on compliance with TMDLs; on compliance with the FRH (note that vast areas of public lands have never had FRH analyses conducted. In those allotments (please provide full mapping and data) that have had FRH assessments conducted, the whole process has become more watered down and diluted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Larson	Pat and Larry		OR	1407	1	GIS data and analysis	While preparing the EA/EIS for the BLM Grazing Regulation Updates the existing allotment data should be examined to ensure the data was compiled using random sampling methods and is accurate.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339		6 GIS data and analysis	The Ecosites, DRGs, SGMs, and all the other model and alternative reality acronyms BLM uses to artificially categorize and segregate plant communities construct a false heavily forage grass biased "range" ideal to elevate commodity use exploitation of public lands. This is divorced from real world ecological processes. Complex native and other vegetation communities are greatly threatened by cattle/sheep grazing and disturbance-caused weeds. The modeling is used to justify maximizing cattle and sheep grazing exploitation and depletion for commodity purposes. These models are also used to justify manipulating lands in veg treatments (ostensibly for GRSG or fuels - but in reality to generate more grass by killing off woody veg for livestock forage) , and/or sacrificing lands to intensive and often severe livestock grazing for the purpose of making ranchers even richer.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	15	15 GIS data and analysis	I require the forthcoming EIS to provide to the public information and data of any and all livestock grazing allotments including but not limited to the allotment name, number of acres, number of AUMs, number of livestock number and type (cattle/sheep/other) and grazing dates as well as a map of the grazing allotments for the lands subject to review in the EIS.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	5	5 GIS data and analysis	I require that substantiated data including all damage or destruction to the forage resources, and methods to gather and prove the data, on all lands within the EIS proposal be provided to the public within the EIS.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	19	19 GIS data and analysis	Available Allotment Information for Research Currently it is extremely difficult to access information about public grazing allotments including season of use, duration and intensity of grazing terms, and existing evaluations of allotment condition. We ask the BLM to support research and innovation by improving its public-facing portal for credentialed researchers where this type of information is easily searchable and spatially explicit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	20	20 GIS data and analysis	I require the EIS to provide to the public scientifically supportable and defensible research, reports and methods the BLM used to obtain the data for the lands included for review in the EIS for the following: *Forage production *Carrying capacity *Acres allocated per Animal Unit Month *Current and historical grazing allocations for livestock *Temporary or extended grazing permits issued in the last 10 years *Total available water sources in the area *How many water sources have been fenced and why *Miles of fencing in the area and purpose of this fencing *Total big game species populations in the area, including how many BLM plan to manage for if those species are not currently at their maximum population targets.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	36	36 GIS data and analysis	All known areas occupied by sensitive, important and ESA species (based on current baseline surveys) must be overlaid with cheatgrass/weed info, with grazing season of use, with stocking under actual use, with monitoring data, with FRH assessment data to determine the status of local and regional habitats and populations. TG, OBG, flexibility, weakening the FRH, streamlining poses a grave threat to the conservation of native biota. Areas where habitat expansion and restoration by recovering native veg is needed must be fully identified and management action be required.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	7	GIS data and analysis	BLM must fully assess how its own models that it appears the proposed Reg revisions will be based on, may be causing rampant ecological problems and loss of sustainability of public lands wildlife, watershed and other values.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	7	GIS data and analysis	Climate change stress disrupts ecological processes. BLM must accurately explain and provide data for how its mountain of acronyms and models actually relate to large climate driven wildfires, and not "prescribed fire" type conditions - which is really the only time grazing in grass communities may make any difference in fires. Grazing makes no difference in shrub communities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	5	GIS data and analysis	BLM currently uses deceptive mapping and modeling in efforts to create an alternate vegetation reality. These efforts are very similar to the Forest Service and TNC methodologies and models that I critiqued in this article about a Pine Valley Utah Project. https://www.counterpunch.org/2019/12/20/voodoo-vegetation-modeling-dooms-native-forests-and-wildlife-habitat/ WLD is submitting our comments on the Pine Valley Project for the record for here, as it appears this regulation revision process may be based on increasing grazing using fuels, outcome-based grazing and other artifices, and weakening the rangeland health process further -and it is already seriously flawed due to BLM using a large number of models and idealized veg communities in FRH assessments and determinations.
Direct/Indirect Impacts								

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	28	Direct/Indirect Impacts	The rules and NEPA analysis should address each of these and propose alternative ways to avoid, minimize, and mitigate adverse effects. 1. Dewatering of streams to the detriment of aquatic ecosystems. 2. Conversion of native riparian habitat and sage brush steppe to hay pastures of exotic grasses. 3. Trampling of biological crusts and contribution to soil erosion. 4. Trampling of biocrusts which facilitate cheatgrass invasion. 5. Soil compaction which decreases water infiltration. 6. The trampling of riparian areas and springs reduces it's ability to soak up water and store for late season flows. It also destroys habitat for native mollucks. 7. Water troughs are breeding grounds for mosquitoes that carry west nile virus (and harm sage grouse). 8. Fences block migration and are a major source of mortality for sage grouse. 9. We kill all kill all kinds of predators and other wildlife (like prairie dogs) as pests and "varmints". 10. The eating of riparian vegetation eliminates hiding cover and habitat for many species from songbirds to sage grouse chicks. 11. Forage competition. On many public lands, the vast majority of forage is allotted to domestic livestock. Many wet meadows, etc. are grazed to golf course height to the detriment of native wildlife. 12. Disease transfer such as occurs with domestic sheep and wild bighorns. 13. Weed invasion-grazing of native perennials and trampling and disturbance of soils favors weedy invasions. 14. Even where grasses are meeting "objectives" like 4 inch stubble height that is not enough to hide ground nesting birds. For instance, grouse require at least 10 inches of stubble height which you seldom see where there is significant grazing. 15. Effects on fire regimes. The invasion of cheatgrass, created by livestock disturbance, is a major factor in the burnout of sage brush habitat. Similarly, grazing can enhance conifer establishment in the ponderosa zone, including stand densities, again affecting fire regimes. 16, Cows are a major source of methane and thus GHG emissions contributing to global warming. Worse than all the transportation put together. 17. Most of the dams built-in the West are for water storage to provide for irrigation. These dams change the water characteristics of rivers and block migration (think of salmon). While you might say a few situations where dams have created trout habitat below them as "good", this doesn't account for the numerous losses imposed by dams. 18. Grazing favors invasives and exotics over native plants. Grazing has dramatically altered many native plant communities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Marketa		OH	244	2	Direct/Indirect Impacts	I submit that the BLM should further evaluate the long term consequences of grazing. These public areas are essential corridors for native plants, wildlife, and waterways. Improper grazing can destroy this valuable habitat, violate the rights of indigenous peoples and introduce invasive species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	43	Direct/Indirect Impacts	This demonstrates the need for BLM to fully consider the impacts and stresses posed by legacy and ongoing livestock grazing; impacts of grazing on fire frequency/severity and ecosystem trajectories, and the benefits of removal and/or significant reductions in grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harvey	Bill	Baker County	OR	747	2	Direct/Indirect Impacts	The County would like the following analyzed in the future Environmental Impact Statement (EIS): » Promotion of land health: -In fuels reduction on rangeland, forest, and protected areas to reduce wildfire risks -As invasive noxious species control -Riparian use objective;/issues -Soil compaction or soil horizon modification
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	3	Direct/Indirect Impacts	An EIS must include a complete and detailed breakdown of range monitoring data for at least the past ten years, including data distinguishing wildlife and livestock impacts; all of which must be provided to the American public.
Cumulative Impacts								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	19	Cumulative Impacts	Further, BLM herbicide risk and environmental harm analysis deficiencies must be considered as part of cumulative effects of Grazing Reg revisions - especially since BLM is proposing severely impacting soils, veg and wildlife habitats with severe levels of TG, OBG and other harmful practices that will increase weed infestation and expansion risks in project areas as well as across the landscape.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1230	3	Cumulative Impacts	Conditions change very rapidly on public lands as climate stress and more extreme weather conditions bear down, and as BLM veg treatments and and high levels of grazing rapidly expand weeds and degradation. A full hard look at the combined effects of OTHER threats to land health must be used to determine of any continued grazing is suitable, given the magnitude and degree of threats that public lands values face.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	26	Cumulative Impacts	BLM must consider the full spectrum of cumulative effects on the land in determining whether to continue grazing on public lands, or to terminate grazing to protect myriad other multiple uses facing habitat loss, climate change and other stress.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	39	Cumulative Impacts	I require the EIS include any and all research and methods of research regarding any possible failure of the BLM to consider overall cumulative effects of all permitted activities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	60	Cumulative Impacts	Further, we note that BLM is simultaneously proposing to revise its land use planning regulations.[16: See fall 2019 Regulatory Agenda at https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=201910&RIN=1004-AE62.] Given the intersection of the planning regulations with the BLM's grazing regulations, the EIS must consider the combined and interrelated effect of revising both of its regulations.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	61	Cumulative Impacts	Further, we note that BLM is simultaneously proposing to revise its land use planning regulations.[16: See fall 2019 Regulatory Agenda at https://www.reginfo.gov/public/do/eAgendaViewRule?pubId=201910&RIN=1004-AE62 .] Given the intersection of the planning regulations with the BLM's grazing regulations, the EIS must consider the combined and interrelated effect of revising both of its regulations.
Subpart 4100 - Grazing Administration - Exclusive of Alaska; General								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlson	James	Montana Natural Resource Coalition		1342	17	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Issue: Local Grazing District Advisory Boards, incorporation of meaningful consistency review with local government policies. Explanation: The revised grazing regulations should recognize the intended role for local grazing district boards to advise and inform the agency. There is confusion concerning the grazing district advisors' role in various aspects of decision making. As a result, the Secretary of the Interior may not have all the information to make the best decisions: "may have the fullest information and advice concerning physical, economic, and other local conditions in the several grazing districts." Alternatives should incorporate the statutorily established role of the grazing district, a process which in turn would lessen the agency's administrative burden. Agencies should also confirm that financial resources are reaching grazing advisory boards/local government in order that they can fulfill their obligations consistent with 43 USC 315(i); 43 USC 1753; 43 USC §1751; 43 USC § 1904. Criteria: NEPA/CEQ: 42 USC § 4334 Other statutory obligations of agencies - "Nothing in section 4332 or 4333 of this title shall in any way affect the specific statutory obligations of any Federal agency (1) to comply with criteria or standards of environmental quality, (2) to coordinate or consult with any other Federal or State agency, or (3) to act, or refrain from acting contingent upon the recommendations or certification of any other Federal or State agency." 42 USC § 4335 Efforts supplemental to existing authorizations - "The policies and goals set forth in this chapter are supplementary to those set forth in existing authorizations of Federal agencies." 40 CFR § 1501.6 Cooperating agencies - "... Use the environmental analysis and proposals of cooperating agencies with jurisdiction by law or special expertise, to the maximum extent possible consistent with its responsibility as lead agency." 40 CFR §1502:16 Environmental consequences - "... It [the EIS] shall include discussions of: ... (c) Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned." 40 CFR § 1506.2 Elimination of duplication with State and Local procedures - 40 CFR § 1508.5 Cooperating agency -43 CFR Part 4100: 43 CFR §4100.0-2 Objectives - 43 CFR §4100.0-5 Definitions - 43 CFR §4120.3-8 Range improvement Fund - 43 CFR §4120.5 Cooperation - Subpart 4180 - Fundamentals of Rangeland Health and Standards for Grazing Administration - TGA: 43 USC §315(o-1) Board of grazing district advisers - "(a) In order that the Secretary of the Interior may have the benefit of the fullest information and advice concerning physical, economic, and other local conditions in the several grazing districts, there shall be an advisory board of local stockmen in each such district, the members of which shall be
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Correll	Leanne	SER Conservation District	WY	1066	11	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Administrative decisions. The SER CD supports the ability of the authorized officer to make decisions administratively and be effective immediately, not subject to the Proposed Decision and Protest process. The following actions should be allowed by the Authorized Officer through a streamlined process: Crossing Permits (4130.6-3), Targeted Grazing, and Transfer of Grazing Preference (4110.2-3).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Vonda		NM	899	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Currently the BLM is held to no science-based standard with respect to the information that the “authorized officer” can use to make grazing decisions. Monitoring data is inconsistent and variable methods are used that do not allow for a reliable trend development. Trends are developed over time and are necessary for true ecological determinations and must be the basis for grazing decisions in the future. Long term measureable data in monitoring programs must be science-based for quality and quantity. Working with us on tangible, proven methods will set a quality standard. We cannot sustain if we do not appropriately manage our land and we know this. Part of this could be mediated by reinstating “Grazing Advisory Boards” as per Section 18 of the Taylor Grazing Act.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Katlyn	Nevada State Grazing Board N2	NV	1174	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	the GABs have historically been found to benefit the BLM District offices in addition to the MUAB regarding livestock grazing management decisions. By using GABs, the District Manager (DM) had the ability to call on them to assist in setting the priorities for the district regarding any range improvements, conflicts, and/or grazing issues. In particular, the GABs could be called upon to help the DM with any specific permittee grazing issues that needed to be addressed. This historically proved to be a valuable asset to the DM, and the Board retains that this would be a highly effective cooperation today. These grazing regulations offer the perfect opportunity to overcome what appears to be a Federal Advisory Committee Act (FACA) enforced abandonment of the MUABs and GABs, and coincidentally explore the reinstatement of both boards in an effort to effectively promote communication between the BLM and permittees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Katlyn	Nevada State Grazing Board N2	NV	1174	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The Board acknowledges that the BLM has experienced both a significantly decreasing number of Range Specialists within the BLM and an overwhelming increase in new directives. However, the Board strongly believes that the establishment of the Resource Advisory Committees (RAC) in lieu of the BLM District process for working with representative groups through the Multiple Use Advisory Boards (MUAB) has negatively affected Nevada's public lands. These MUAB historically provided exceptionally effective assistance to the BLM in creating, revising, and updating Land Use Plans. The Board recognizes that there is a pause currently on the reappointment of RACs across the west; however, the BLM should review the past MUAB model to fully understand the details on how these councils operated. The N-2 Board has worked with the BLM on grazing related matters for the past 40+ years. Throughout this extensive partnership, the Board has found that the MUABs and the District Manager's Grazing Advisory Boards (GAB as further explained below), when used, are the most effective methods for rangeland and multiple use management on BLM public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gloeckner	Kena			1198	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	In relation to the above dilemma, we feel that too much power is invested in the "authorized officer," inexperienced range personnel, and others thousands of miles away who make decisions on the land that we are charged with protecting to ensure our livelihood. Often times, these people have no understanding of the on-the ground realities. The same holds true for many of your Resource Advisory Committees (RAC); many of these people are too far removed to make educated and beneficial decisions regarding the land. We feel that more decision-making and advisory responsibilities need to be guided by local governments, local interests, and local users of the land. These boards need to be developed at the county level since even decisions made at the state level are often too far removed from the areas of concern. These people can then assist district managers in making sound and productive decisions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Corn	Bronson	New Mexico Wool Growers, Inc	NM	1369	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	NMWGI recommends that the reference to the development of a land use plan be changed from a regulatory reference to 43 CFR part 1600, which is another BLM regulation, to the Federal Land & Policy Management Act (FLPMA) which is the only legal authority for a BLM land use process. It is our opinion that the BLM Regulations at CFP part 1600 do not now, on a variety of subjects, reflect the intent of Congress as stated in FLPMA. We also recommend that language in this definition that conveys that land use plans establish "direction" be removed. The word "direction" should be replaced with guidance.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	25	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Recommend that the reference to the development of a land use plan be changed from a regulatory reference to 43 CFR part 1600, which is another BLM regulation, to the FLPMA which is the only legal authority for a BLM land use process. It is our opinion that the BLM Regulations at CFP part 1600 do not now, on a variety of subjects, reflect the intent of Congress as stated in FLPMA. We also recommend that language in this definition that conveys that land use plans establish "direction" be removed. The word "direction" should be replaced with guidance.
	Black	Georgia	Reese River Valley, LLC	NV	1282	29	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Consultation, cooperation, and coordination: The definition should be returned to BLM's pre-1995 grazing regulations to maintain consistency with the language in the Federal Land Policy and Management Act (FLPMA).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Flexibility in rangeland management should also include the use of temporary non-renewable Animal Unit Months (AUMs), or TNR. This is a tool that can properly utilize excess forage and fine fuels when conditions allow. Some years will receive above average precipitation, and in turn will produce more forage. Though the current grazing regulations authorize the use of TNR, very few BLM land managers are utilizing this tool. It is imperative that the BLM emphasize the use of TNR in the revised grazing regulations
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	14	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	In Idaho, we have recently seen a trend of arbitrarily decreasing AUMs without any long-term trend monitoring data to justify the decrease. Principles of rangeland management clearly outline that stocking rates should be set based on available forage. Decreasing AUMs without long-term trend and actual use data or production data will lead to an improper stocking rate for the allotment and most likely produce an increase in fine fuels. These methods for reducing AUMs are typically caused by the inability for range staff to collect long-term trend monitoring data. Staff are now office bound and tied to NEPA rather than collecting data to support the decisions made in the NEPA process. The State of Idaho requests that the BLM address how to properly set stocking rates in the revised grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	DeSoto	Randi	Summit Lake Paiute Tribe	NV	883	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	funding derived from current fair-market value grazing fees and congressional appropriation can be used to expand existing programs such as the Nevada Term Grazing Permit Renewal Strategy (NTGPRS) (Instruction Memorandum NV IM-2014-005). The NTGPRS permits the Nevada BLM to process grazing permits by utilizing a combination of dedicated Term Permit Renewal Teams (TPRTs) located in District Offices/Field Offices (DOs/FOs) and via the creation of a Statewide Term Permit Renewal Team (STPRT). In short, increases in funding would allow for the necessary workforce capable of meeting agency-wide permitting workflows. This would effectively address the grazing permit backlog while maintaining the BLM's responsibility to the public by sustaining the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
	Smith	Sindy	State of Utah	UT	1310	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Livestock are used as a tool for improving land health by performing weed control, reducing wildland fire, and aiding in restoration projects and should not be administered under the 43 C.F.R. 4100 Grazing Regulations. Unlike traditional grazing, targeted grazing companies are service providers and should be administered under contracts with clearly stated goals.
	Goetz	Katie	New Mexico Department of Agriculture		1115	12	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	How does the BLM define "indigenous animals"? NMDA requests that this definition be added to the regulation to create parity in the level of understanding between that phrase and the word "livestock", particularly since § 4130.6-4 provides for the authorized officer to grant special grazing permits or leases for privately owned or controlled "indigenous animals".
	Eaton	Wesley			1503	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	A Grazing permit needs to be recognized for what it is: A legal right to graze a specific amount of animals on public lands that was purchased on the open market bound by the statute to provide economic value to the citizens of the USA
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rodriguez	Dan	Mohave County Farm and Livestock Bureau	AZ	1489	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Consultation, cooperation and coordination" Should return to BLM's pre-1994 grazing regulation and be consistent with the language in FLPMA. "Consultation, cooperation and coordination means an interchange of opinions on issues, plans or management actions from other agencies and effected permittees or lessees, landowners involved, the districi grazing advisory boards where established, any state having lands within the area to be covered by an allotment management plan and other affected interests" "Interest Public" Should be limited to persons or groups living within the local area and would be affected by any plans or decisions made by the BLM & the permittees or lessees. As the regulation reads now anyone from anywhere can be involved and sue the BLM for decisions, disrupting good management practices and preventing the ranchers from receiving the permits to establish the infrastructure needed to better manage their ranching operations. "Public Lands: " Public lands should be referred to as Federal lands. Everywhere the statement "public lands" appears in the regulations it should be changed to "Federal lands". The termpublic lands misleads' a segment of the public into believing, as ranchers have been informed, they are the owners of the land along with any improvements. Improvements are owned for the most part, by the ranchers. The public is led to believe they have the right do whatever they want on said lands along with the rancher's improvements, as well as, land owned by others within the allotments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	WSGB recommends that the definition of "base property" be redefined in the BLM Grazing Regulations as: " Non-federal land owned or controlled by the applicant for a grazing permit that serves as a base of operations for the permit in the application and which has been determined by the AO to be adequate as the base of operations for the preference level of AUM's to be attached to the offered base property."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stroh	William	Stroh Farms, Inc	MT	1468	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Why are yearling AUM's the same as cow-calf AUMs. They should be 7/10 AUM if a cow is 1 AUM.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	12	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	What is more, MWGA's membership recommends that the definition of the term 'utilization' should be modernized to read as follows: "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season and may refer either to a single species or to the vegetation as a whole." In turn, the updated regulations should delete the reference in the current 'utilization' definition to a "specific period" and the vague and problematic "pattern of use" term;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	We suggest that the regulations be modified to define significant progress as follows: Significant progress means objectively-measured progress of key ecosystem parameters with the objective of meeting standards within 10 years.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	Peter	Riddle Ranches, Inc.		1211	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	We feel that the "interested public" needs to be redefined.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	31	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Utilization: Refine the definition of "utilization" to read as follows: "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season or end of the annual grazing season, whichever comes later. Utilization may refer either to a single species or to the vegetation as a whole." The definition should remove the phrases "specific period" "pattern of use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	This update should include changing "affected interest" to include an individual or organization in possession of a preference grazing right.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The WSGB recommends that the term, "base of operations" be added to the Grazing Regulations and be defined as: " Non-federal land determined by the AO to be the base of operations for livestock in a grazing permit when they are not authorized by the AO to graze on Federal BLM lands."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The WSGB also recommends that separate definitions in the BLM Grazing Regulations be developed for land base property and water base property because these two types of base property do, in fact, have very different criteria for qualification as the base of operations for ranchers in different areas of BLM managed lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	11	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The term 'affected interest' should be updated to read: "Affected Interest" means an individual or organization in possession of a preference grazing rights as defined in 43 CFR § 4100, or its equivalent."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Denice	Lincoln County, NV		1177	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The term 'Affected interest' needs to be brought back with a definition that limits 'Affected interest' to people directly affected (i.e. grazing preference owners, permittees, state and local governments, etc.); the term 'interested party' can be anyone, but their comments must carry less weight than those directly affected and only apply when the management action is of significant consequence (not a permit renewal).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The term "Grazing Preference", the definition of "grazing preference or preference" should be restored to its prior version and include both a priority position for renewal of a grazing permit and the level of AUMs that were established for that permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Correll	Leanne	SER Conservation District	WY	1066	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The term "Conservation Use" should be stricken from the grazing regulations. Well managed grazing can be a form of conservation use, as is discussed under the concept of using grazing as a tool to achieve rangeland health standards.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	16	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The regulations should include wholesale changes from "permittee" to "preference holder." This would return to the intent of the Taylor Grazing Act and true grazing preference.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The regulation should read: "Consultation, cooperation and coordination means an interactive process for seeking advice, agreement, or interchange of opinions on issues, plans, or management actions from other agencies and effected permittees or lessees, landowners involved, the district grazing advisory boards where established, any state having lands within the area to be covered by an allotment management plan and other affected interests."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	909	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The existing narrative after “multiple use and sustained yield” conveys a level of detail for the contents and purpose of the LUP that may be in excess of Congressional intent in the FLPMA, and may also be restrictive on the ability of the current Secretary of Interior to determine the content and purpose of a BLM – LUP.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1079	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The existing narrative after “multiple use and sustained yield” conveys a level of detail for the contents and purpose of the LUP that may be in excess of Congressional intent in the FLPMA, and may also be restrictive on the ability of the current Secretary of Interior to determine the content and purpose of a BLM – LUP.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	32	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The existing narrative after "multiple use and sustained yield" conveys a level of detail for the contents and purpose of the LUP that may be in excess of Congressional intent in the FLPMA, and may also be restrictive on the ability of the current Secretary of Interior to determine the content and purpose of a BLM -LUP.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schultz	Nick		MT	1027	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The definition of Affected Interest should go back to what it was before 1995.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Correll	Leanne	SER Conservation District	WY	1066	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The definition for "Grazing Preference" or "Preference" should be restored to the definition that was in use prior to changes made under the current grazing regulations: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Correll	Leanne	SER Conservation District	WY	1066	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The definition for "Consultation, Cooperation, and Coordination" should be consistent with FLPMA and the one in use prior to changes made under the current grazing regulations: "Consultation, cooperation and coordination means an interactive process for seeking advice, agreement, or interchange of opinions on issues, plans, or management activities from other agencies and effected permittees or lessees, landowners involved, the district grazing advisory boards where established, and any state having lands within the area to be covered by an allotment management plan and other affected interests."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The context of the definitions of terms used such as valid existing rights, preference, consultation, co-operation and coordination should be used according to those definitions originally set out in the Taylor Grazing Act (TGA), Public Range Land Improvement Act (PRIA) and so forth.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbetts	Ron	Prairie County Cooperative State Grazing District	MT	1391	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The "carrying capacity" needs a better definition to separate wildlife and domestic livestock use. This will account fairly for livestock use and not penalize the permittee for wildlife concentrations that cannot be controlled as domestic livestock can be.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	25	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Subleasing -There is no legal authority for a surcharge to the grazing fee for subleasing. The current process that requires a base property lease and permit transfer for someone other than the base property owner to graze an allotment is unnecessary and inefficient. It wastes the time of agency personnel in processing documents necessary for the permit transfer that could be used for other things like collecting monitoring data. The permittee is still responsible for grazing management and can be held accountable for that management. As a practical matter, in most lease arrangements the lessee is already a permit holder on a nearby or neighboring operation. The prohibition of subleasing and the subleasing surcharge serves no useful purpose and should be eliminated.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hart	Charles	Society for Range Management	CO	1076	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Section 4100.0-5 Definitions: We suggest removing the definition Conservation Use. The purposes presented in the definition of Conservation Use can be achieved through the proper grazing management. Land managed under the Grazing Regulations is suitable for grazing and therefore, grazing should be managed to provide conservation benefits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Replace Definition for "Utilization" - "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season. May refer either to a single species or to the vegetation as a whole."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Replace Definition for "Monitoring" - "Monitoring" means the periodic observation and orderly collection of quantitative data to evaluate..."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Replace Definition for "Interested public" - "Interested public means an individual, group or organization that has submitted written comments to the BLM raising specific concerns during the public comment period regarding the adoption or renewal of an allotment management plan or other grazing management prescriptions, and has requested in writing to the Authorized Officer to be an interested public on one or more allotments."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Replace Definition for "Grazing Preference" - "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans."o Section 4130.2, Grazing permits or leases should be updated with similar language
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Replace Definition for "Consultation, cooperation, and coordination" - The definition should be returned to BLM's pre-1994 grazing regulations and is consistent with the language in FLPMA: "Consultation, cooperation and coordination means an interactive process for seeking advice, agreement, or interchange of opinions on issues, plans, or management actions from other agencies and effected permittees or lessees, landowners involved, the district grazing advisory boards where established, any state having lands within the area to be covered by an allotment management plan and other affected interests."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	30	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Recommend that the reference to the development of a land use plan be changed from a regulatory reference to 43 CFR part 1600, which is another BLM regulation, to the FLPMA which is the only legal authority for a BLM land use process. It is our opinion that the BLM Regulations at CFP part 1600 do not now, on a variety of subjects, reflect the intent of Congress as stated in FLPMA. We also recommend that language in this definition that conveys that land use plans establish "direction" be removed. The word "direction" should be replaced with guidance.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	909	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Recommend that the reference to the development of a land use plan be changed from a regulatory reference to 43 CFR part 1600, which is another BLM regulation, to the FLPMA which is the only legal authority for a BLM land use process. It is our opinion that the BLM Regulations at CFP part 1600 do not now, on a variety of subjects, reflect the intent of Congress as stated in FLPMA. We also recommend that language in this definition that conveys that land use plans establish “direction” be removed. The word “direction” should be replaced with guidance.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1079	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Recommend that the reference to the development of a land use plan be changed from a regulatory reference to 43 CFR part 1600, which is another BLM regulation, to the FLPMA which is the only legal authority for a BLM land use process. It is our opinion that the BLM Regulations at CFP part 1600 do not now, on a variety of subjects, reflect the intent of Congress as stated in FLPMA. We also recommend that language in this definition that conveys that land use plans establish “direction” be removed. The word “direction” should be replaced with guidance.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hess	Carie	Petroleum County Conservation District	MT	1146	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Recognize that "grazing permit or lease" as defined in 43 U.S.C. § 1702(p) "means any document authorizing use of public lands or lands within the National Forest. . . for the purpose of grazing domestic livestock.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hess	Carie	Petroleum County Conservation District	MT	1146	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Recognize that "allotment mqnagement plans" as defined in 43 U.S.C. § 1702(k) "applies to livestock operations on the public lands or on lands within National Forests in the eleven contiguous western States.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Public involvement: means the opportunity for participation by affected citizens and the interested public in rule making, decision making, and planning with respect to public lands, including public meetings, or hearings held at locations near the affected lands, or such other procedures as may be necessary to provide public comment in a particular instance. (See item (d) in the FLPMA under Section 103 Definitions.)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ball	Robert		CO	1083	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Public access to all BLM administered lands should be insured. Changes to part 4100 allowing permittees to restrict access, like those proposed, but never implemented, during the George W. Bush administration, violate one of BLM's primary missions, as well as the Taylor Grazing Act and FLMPA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Short	Robert	Converse County, WY	WY	1396	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Preference of Grazing Preference - BLM should redefine "preference" or "grazing preference" to include both a priority position for renewal of a grazing permit and the level of AUMs that were established in the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	17	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Preference definition- The preference originally associated with a permit should not be changed without consent and cooperation of the permittee. Agency personnel sometimes attempt to decrease the preference numbers of a permit on transfer or renewal. Preference numbers are used as a measure of the value of the ranching unit they are attached to. As such they are an important component of the financial condition of the ranching operation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nowlin	Laura		MT	1107	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Pre-1995 definitions, including a priority position for renewal of a grazing permit, should be restored.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	PFC should be defined in the regulations as follows: The PFC method is a qualitative assessment based on quantitative science that is conducted only by an experienced ID team of resource specialists from multiple relevant disciplines. It is not designed to monitor resource conditions and trends, assess specific resource values or be the sole method for assessing the health of a resource area.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Permitted Use - This term should be removed from the regulations and replaced with the term "preference."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ohs	Brian	Montana Stockgrowers Association		1163	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	our organizations would first like to see the definition of "Grazing Preference or Preference" (43 CFR 4100.0.:.5) returned to the pre-1995 determination including a priority position for renewal of a grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ohs	Brian	Montana Stockgrowers Association		1163	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	our organizations wou.ld encourage the use of "Domestic Livestock Carrvinq Capacity" as opposed to "Carrying Capacity'~ as a preferred determination with the following clarification: "Domestic Livestock Carrying Capacity means a quantifiable number of AUMs as determined by rangeland studies designated to determine and quantify a stocking rate on a sustained yield basis upon a given area of public lands without inducing damage to vegetation or related resources." This will better allow the BLM to determine factors of adverse range conditions due to over-use attributed to domestic livestock, wildlife or wild horses and burros.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ohs	Brian	Montana Stockgrowers Association		1163	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	our organizations recommend the removal of the term "Conservation Use" in order to remain consistent with the U.S. District Court opinion that found the term supersedes the BLM's authority under the. Taylor Grazing Act.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ohs	Brian	Montana Stockgrowers Association		1163	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	our organizations believe that the definition of "Affected Interest" should read: "Affected Interest means an individual or organization in possession of a preference grazing right as defined in 43 CFR 4100, or its equivalent."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	One definition we suggest be amended is "land use plan." Section 4100.0-8 of the current regulations requires that grazing be managed "in accordance with applicable land use plans," which are now defined to include only the BLM's resource management plans (RMPs). The State of Utah and all public lands counties in the state have adopted their own resource management plans. We request that this definition or the regulations themselves be amended to require that grazing be managed in accordance with not only the applicable BLM RMP but also in accordance with State and county RMPs to the greatest degree possible, as required by FLPMA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Objectives" by definition must be measurable. This definition will help insure that the development of measurable allotment objectives must include consultation, cooperation and coordination (CCC) with the permittees/lessees and include items of importance to the legal requirement that BLM actions/decisions must contribute to the sustainability of multiple uses and help stabilize each ranch and the livestock industry.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	New Definition for "Affected Interest" - "Affected Interest" means an individual or organization in possession of a Preference grazing right as defined in 43CFR § 4100, or its equivalent."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	MWGA's membership requests that the definition of 'consultation, cooperation, and coordination' should be restored to its pre-1994 grazing definition, which would be consistent with the language in FLPMA. MWGA's membership assertions the regulation should be changed to read, "[C]onsultation, cooperation and coordination means an interactive process for seeking advice, agreement, or interchange of opinions on issues, plans, or management actions from other agencies and effected permittees or lessees, landowners involved, the district grazing advisory boards where established, any state having lands within the area to be covered by an allotment management plan and other affected interests.";
							Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Monitoring -The application of quantitative data is preferred in comparison to estimates and projections as these can have real economic and logistical implications on permittees. Revise the definition for monitoring so it reads "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) effects of management actions; and (2) Effectiveness of actions in meeting management objectives."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Back	Gary			1207	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Making or updating the definition of AUM is needed to clarify and to have one definition of this term. The definition of AUM was not consistent in the material provided at the public scoping meeting. In the Permitting Efficiency handout AUM is defined as: the amount of forage necessary for the sustenance of one cow or its equivalent for a period of 1 month; and in the Rangeland Management & Grazing handout the AUM is defined as: the amount of forage needed to sustain one cow and her calf, one horse, or five sheep or goats for a month.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Back	Gary			1207	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	It would seem appropriate to incorporate into the 43 CFR Subpart 4100, §4100.0-5 monitoring specific to determining rangeland health and conformance with guidelines as part of the allotment management plan/resource activity plan.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Interested Public - We believe this definition should be limited in scope and only apply to a person who has requested in writing to the Authorized Officer, to be an interested public on one of more allotments and has provided comments on the adoption or renewal of an allotment management plan. We suggest revising the definition to read "Interested public means an individual, group or organization that has submitted written comments to the BLM raising specific concerns during the public comment period regarding the adoption or renewal of an allotment management plan or other grazing management prescriptions, and has requested in writing to the Authorized Officer to be an interested public on one or more allotments."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keeler	Murray & Judy		NM	1018	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Interested Public Interested Public, also known as Affected Interest, are very broad terms. They only serve to confuse the public and complicate the grazing permitting process. Only the public that are directly impacted by a management decision should be granted this status.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dowell	Samuel		OR	750	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Interested public -Interested public should be defined in such a way that does not allow every member of the public to appeal every action implanting an allotment management plan or orpther grazing management plans. It should be defined as a person who has requested in written to be an interested public on that allotment and has provided comments during the public comment period.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	individuals should have requested in writing to the AO to be an "interested public" on one or more allotments and have provided comments on the adoption of an allotment management plan, renewal of a term grazing permit, or other relevant administrative action. We recommend revising the definition as follows: "Interested public means an individual, group or organization that has submitted written comments to the BLM raising specific concerns during the public comment period regarding the adoption or renewal of an allotment management plan or other grazing management prescriptions, and has requested in writing to the AO to be an interested public on one or more allotments."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schultz	Nick		MT	1024	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	I would like the Grazing Preference return to what the definition was before 1995, Grazing Right. The term Grazing Preference created unknowns in the finacial and long term management of operating ranches associated with a BLM grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Grazing Preference - Replace definition with "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans." This also needs to be added to Section 4130.2 Grazing Permits or Leases.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keeler	Murray & Judy		NM	1018	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Federal Land definitions should remain consistent within the Department of Interior/Bureau of Land Management. The term "public lands" is confusing and does not describe the western rangelands. Federal lands are defined as any land outside of Alaska owned by the United States and administered by the Secretary of the Interior through the Bureau of Land Management. Internally they are never called public lands until the BLM addresses the "public". Only then are the western rangelands referred to as "public lands."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Federal Courts have ruled that the change to the BLM Grazing Regulations in RR 94 that allowed "conservation use" grazing permits are illegal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Department should clarify the definition of grazing preference to ensure consistency the Taylor Grazing Act and FLPMA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Delete "Permitted use" from the definitions. The term "Grazing preference" should replace the term "Permitted use" wherever it is used in the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Delete "Conservation use" from the definitions and throughout the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Current regulations eliminated the requirement that the BLM must conduct meaningful consultation, cooperation and coordination with grazing permittees and lessees. See Public Rangeland Improvement Act (PRIA), Section 8.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Consultation, Cooperation, and Coordination - This definition should be revised so that it returns to BLM's pre-1994 grazing regulations and is consistent with the language in the Federal Land Policy and Management Act (FLPMA). The revised definition should read as "Consultation, cooperation and coordination means an interactive process for seeking advice, agreement, or interchange of opinions on issues, plans, or management actions from other agencies and effected permittees or lessees, landowners involved, the district grazing advisory boards where established, any state having lands within the area to be covered by an allotment management plan and other affected interests."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	20	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Conservation use or retirement of grazing permits harms local economies and the tax base of local governments. It should not be allowed.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Conservation Use - This should be removed from the definitions and deleted throughout the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keeler	Murray & Judy		NM	1018	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Conservation Use Non-use for conservation purposes should have a specified goal; determined by the BLM and the grazing allotment owner. It should also have a specified time limit for completing the defined goal. If the goal is not achieved by the agreed date, the grazing permit should be offered to an adjoining allotment owner.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	908	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Change the definition of “preference.” “Preference” was legally adjudicated to the qualified base property owned or controlled by the owner of that “preference” and as such, neither the Secretary of the Interior nor BLM officials have the legal right to cancel a “preference.”
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	22	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Change the definition of "preference." "Preference" was legally adjudicated to the qualified base property owned or controlled by the owner of that "preference" and as such, neither the Secretary of the Interior nor BLM officials have the legal right to cancel a "preference."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	22	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Change the definition of "preference." "Preference" was legally adjudicated to the qualified base property owned or controlled by the owner of that "preference" and as such, neither the Secretary of the Interior nor BLM officials have the legal right to cancel a "preference."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Change the definition of "preference." "Preference" was legally adjudicated to the qualified base property owned or controlled by the owner of that "preference" and as such, neither the Secretary of the Interior nor BLM officials have the legal right to cancel a "preference."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frank	Bobbie	Wyoming Association of Conservation Districts	WY	1222	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	BLM should redefine "preference" or "grazing preference" to include both a priority position for renewal of a grazing permit and the level of AUMs that were established in the permit.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	BLM should delete the reference in the current "utilization" definition to a "specific period" and the vague term "pattern of use". Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season. May refer either to a single species or to the vegetation as a whole. Entering permits should be when grass is available, and isn't always congruent with all of the agencies concerned and sometimes the available forage isn't utilized to its fullest capacity. Producers are the best on the ground resources for management objectives in concert with agents of the government.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Based on the prior regulations, the definition should be: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension, and other uses as authorized under these regulations and provided in agency guidance and policy. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Based on the prior regulations, the definition should be: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension, and other uses as authorized under these regulations and provided in agency guidance and policy. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	15	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	At the location of the last sentence at Sec. 4100.0-8, the WSGB recommends a change from the language that now says, "... the AO shall be in conformance with the LUP as defined at 43 CFR 1601.0-5 (b) because the BLM's Planning Regulations at 43 CFR 1601.0-5 9 b) are in conflict with the Secretary of interior's policy to promote adaptive management and restricts the use of the flexibility policy of the BLM.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cargill	Emilia	GEYSER CATTLE COMPANY LLC	NV	1255	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	And although it seems to be obvious, all of the BLM's decisions regarding grazing should focus on the science, not amorphous terms that as the year have shown have little effective or practical meaning on the range, such as "conservation use." The term "conservation use" should be eliminated from the regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	An AMP functional equivalent is an activity plan developed by another agency or permittee that describes grazing management and is approved by the authorized officer, or a plan developed by the BLM for other activities that also includes grazing management prescriptions". The term "Permitted use", should be removed from the regulations. The term "preference" should replace the term "permitted use" everywhere that it is now being used. The term "Conservation use", should be removed from the regulations.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Also, MWGA's membership supports restoring the definition 'of 'grazing preference or preference to its prior definition. Further, the definition should include a priority position for renewal of a grazing permit AND the level of AUMs that were established for that permit. As such, the definition should read: "grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for EACH grazing permit in the respective Land Use Plans.";
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Affected Interest - A new definition should be created to read "Affected Interest means an individual or organization in possession of a Preference grazing right as defined in 43 CFR § 4100, or its equivalent."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Accordingly, we request that the Department redefine grazing preference to mean: A first priority for permit renewal that is held by the current permittee, provided the permittee retains a valid grazing permit and remains at all times in compliance with the terms and conditions of that permit. We further recommend that, in the context of transfer, inheritance, and cancellation, the Department replace the term "grazing preference" or "preference" with "grazing privileges."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1080	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	A number of Federal Court decisions have determined that the “public lands” are owned by the federal government and are held in trust and managed for multiple use on behalf of the public, but they are not legally owned by the “public.” The “public” has no right, title or interest as defined by the Taylor Grazing Act of 1934 to these lands.· “Federal lands” for the purposes of these regulations, Federal Land is defined as any land outside of Alaska owned by the United States and administered by the Secretary of the Interior through the Bureau of Land Management, except lands held for the benefit of Indians.· Additionally, when each State in the West became a State, the federal government required each State to recognize that all lands within their respective boundaries not private or State land, at the time of acceptance by Congress of the application to become a State, belonged to the federal government.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	A number of Federal Court decisions have determined that the "public lands" are owned by the federal government and are held in trust and managed for multiple use on behalf of the public, but they are not legally owned by the "public." The "public" has no right, title or interest as defined by the Taylor Grazing Act of 1934 to these lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Zion	Candi		MT	35	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	4100.0.5 Buffalo are not included in the class of livestock list; should they or shouldn't they be? If they are added to the list, a distinction should be made based on the intent of the owner- are they for meat production or wildlife restoration? Livestock are defined as domesticated animals regarded as an asset for profit or meat production. That disqualifies animals kept for wildlife restoration. If buffalo are to be included as livestock, the definition must clearly state buffalo are included only if they are managed as an asset for profit.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1080	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	“Objectives” by definition must be measurable. This definition will help insure that the development of measurable allotment objectives must include consultation, cooperation and coordination (CCC) with the permittees/lessees and include items of importance to the legal requirement that BLM actions/decisions must contribute to the sustainability of multiple uses and help stabilize each ranch and the livestock industry. · Change the definition of “preference.” “Preference” was legally adjudicated to the qualified base property owned or controlled by the owner of that “preference” and as such, neither the Secretary of the Interior nor BLM officials have the legal right to cancel a “preference.”
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	21	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Objectives" by definition must be measurable. This definition will help insure that the development of measurable allotment objectives must include consultation, cooperation and coordination (CCC) with the permittees/lessees and include items of importance to the legal requirement that BLM actions/decisions must contribute to the sustainability of multiple uses and help stabilize each ranch and the livestock industry.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Greeman	Michelle		NM	1090	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Objectives" by definition must be measurable. This definition will help insure that the development of measurable allotment objectives must include consultation, cooperation and coordination (CCC) with the permittees/lessees and include items of importance to the legal requirement that BLM actions/decisions must contribute to the sustainability of multiple uses and help stabilize each ranch and the livestock industry. · Change the definition of "preference." "Preference" was legally adjudicated to the qualified base property owned or controlled by the owner of that "preference" and as such, neither the Secretary of the Interior nor BLM officials have the legal right to cancel a "preference."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Monitoring" - Edit the definition of "monitoring" by adding the word "quantitative" before "data" so that the definition reads: "Monitoring" means the periodic observation and orderly collection of quantitative data to evaluate..." It is vital to avoid "best guess" opinions by BLM on grazing decisions that have economic and practical implications to our permittees. This should be performed over an extended period of time up to and including at least the previous five years.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	26	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Federal lands" for the purposes of these regulations, Federal Land is defined as any land outside of Alaska owned by the United States and administered by the Secretary of the Interior through the Bureau of Land Management, except lands held for the benefit of Indians. -Additionally, when each State in the West became a State, the federal government required each State to recognize that all lands within their respective boundaries not private or State land, at the time of acceptance by Congress of the application to become a State, belonged to the federal government.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Federal lands" for the purposes of these regulations, Federal Land is defined as any land outside of Alaska owned by the United States and administered by the Secretary of the Interior through the Bureau of Land Management, except lands held for the benefit of Indians.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Consultation, cooperation, and coordination" - The definition should be returned to BLM's pre-1994 grazing regulations and is consistent with the language in FLPMA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	14	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Conservation Use" should be removed from the regulations. Properly managed adaptive grazing (which included periods of rest from grazing) on the landscape is conservation use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nowlin	Laura		MT	1107	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Carrying capacity" should be ammended to "domestic livestock carrying capacity".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	15	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	With respect to the term 'permitted use", the WSGB recommends removal of that term everywhere it now appears in the Regulations. Where appropriate, replace the term "permitted use" with the word "preference", defined as recommended by the WSGB later in this document.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	12	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	With respect to the term 'permitted use", the WSGB recommends removal of that term everywhere it now appears in the Regulations. Where appropriate, replace the term "permitted use" with the word "preference", defined as recommended by the WSGB later in this document.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	With respect to land base property, the WSGB recommends that the definition of "base property" be redefined in the BLM Grazing Regulations as: " Non-federal land owned or controlled by the applicant for a grazing permit that serves as a base of operations for the permit in the application and which has been determined by the AO to be adequate as the base of operations for the preference level of AUM's to be attached to the offered base property."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169		7 Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The WSGB recommends that a definition of "Carrying capacity" be changed in the BLM Grazing Regulations to read as follows: " The carrying capacity for livestock on Federal lands is the number of livestock that may be sustained on a management unit without inducing damage to vegetation or related resources as determined from quantitative monitoring data over time. In addition to consideration of the variety of rangeland ecological site characteristics on an area, including the capability of an area to sustain adequate forage production, it is a function of management goals and measurable objectives, and the availability of adequate rangeland improvements including quality and quantity of water, plant species composition including seasonal availability of poisonous plants, competition from other users of available forage, and livestock management intensity."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169		3 Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The WSGB opines that the public has every right to provide "comments " to the BLM on many issues, but we do not read in the FLPMA that the "public" has the same "rights" as do the "affected citizens".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Olson	Vicki		MT	941		1 Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The word preference should be used instead of Permitted use in the whole doc.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Olson	Vicki		MT	941		2 Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The term Conservation use should be totally removed from the doc. The TGA has stated that the land is chiefly for grazing so to be in compliance this is illegal.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The objectives of these regulations are to promote healthy sustainable and improve rangeland ecosystems; to accelerate restoration and improvemeffi of public rangelands to properly functioning conditions; to promote the orderly use, improvement and development of the public lands; to establish efficient and effective administration of grazing of public rangelands; and to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, healthy public rangelands. These objectives shall be realized in a manner that is consistent with land use plans, multiple use, sustained yield, environmental values, economic productivity and other objectives stated in 43 CFR part 1720, subpart 1725; the Taylor Grazing Act of June 28,1934, as amended (43 U.S.c. 315, 315a-315r); section 102 of the Federal Land Policy and Management Act of 1976 (43 U.S.c. 1740). Healthy, proper functioning, and environmental values can't be measured and are highly subjective, these are not good objectives and these terms can't be found in statute. An objective should be accomplish able and time constrained with monitoring that measures the progress or achievement of the objective. "accelerate restoration and improvement", this objective assumes there has been no improvement of BLM lands since 1934 (everything is in bad shape and it is due to grazing). Couldn't the agency admit that there has been improvements in the rangeland and come up with an objective that starts at a positive place to make improvements? "sustain ability of the western livestock industry and communities" where within these regulations is this considered or regulated? The economics of these regulations, and in our experience the planning by the BLM, is an afterthought, but never an objective. [60 FR 9960, Feb. 22, 1995]
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cunningham	Sean		OR	1231	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The definition of the term "utilization" should be edited to read as follows: "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season. May refer either to a single species or to the vegetation as a whole." BLM should delete the reference in the current "utilization" definition to a "specific period" and the vague term "pattern of use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The authorized officer shall manage livestock grazing on public lands under the principle of multiple use and sustained yield, and in accordance with applicable land use plans. Land use plans shall establish allowable resource uses (either singly or in combination), related levels of production or use to be maintained, areas of use, and resource condition goals and objectives to be obtained. The plans also set forth program constraints and general management practices needed to achieve management objectives. Livestock grazing activities and management actions approved by the authorized officer shall be in conformance with the land use plan as defined at 43 CFR 1601.0-5(b). Should this be covered under 43 CFR Part 1600 - PLANNING, PROGRAMMING, BUDGETING? Why does it have to be restated in the grazing regulations? [53 FR 10233, Mar. 29, 1988]
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	13	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Please replace the current definition of "utilization" with the following definition: " The proportion of current years forage production consumed or destroyed by grazing animals." (This is from the Society for Range Management, Glossary of terms used in Range Management, 4th edition, pg. 30) The WSGB recommends removal from the current definition in the Regulations of any reference to "seasonal utilization" or "pattern of use" because neither of these two criteria are supported by the SRM.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Please add a definition of "Affected citizen" to the BLM Grazing Regulations. The term "affected citizen" is used in the Federal Land Planning and Management Act in the definition of "public involvement", and the WSGB feels that both the term "public involvement" and the term "affected citizen" as used in the FLPMA deserves to be in the BLM Grazing Regulations because they reflect the intent of congress on these subjects.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	26	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT: Trend means the direction of change over time, either toward or away from desired management objectives NEW TEXT: Trend means the direction of change over time, either toward or away from desired management objectives which can only be determined with objective, repeatable and quantitative data collected consistently over multiple years. COMMENTERS RECOMMENDS DELETION OF UNAUTHORIZED LEASING AND SUBLEASING: Unauthorized leasing and subleasing means- (1) The lease or sublease of a Federal grazing permit or lease, associated with the lease or sublease of base property to another party without a required transfer approved by the authorized officer; (2) The lease or sublease of a Federal grazing permit or lease to another party without the assignment of the associated base property; (3) Allowing another party, other than sons and daughters of the grazing permittee or lessee meeting the requirements of §4130.7(f), to graze on public lands livestock that are not owned or controlled by the permittee or lessee; or (4) Allowing another party, other than sons and daughters of the grazing permittee or lessee meeting the requirements of §4130.7(f), to graze livestock on public lands under a pasturing agreement without the approval of the authorized officer. RATIONALE: Comment: See definition above of sub-leasing. Allotment owners own their allotments and should be able to sub-lease to whomever they choose without having to divest of their real property.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	25	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT: Temporary nonuse means the authorized withholding, on an annual basis, of all or a portion of permitted use in response to a request of the permittee or lessee. Trend means the direction of change over time, either toward or away from desired management objectives. NEW TEXT: Temporary nonuse means the authorized withholding, on an annual basis, of all or a portion of active use in response to a request of the permittee or lessee.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	22	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT: Service area means the area that can be properly grazed by livestock watering at a certain water NEW TEXT: Service area means the area that can be properly grazed by livestock watering at a certain water as may be necessary to permit the proper use of lands, water or water rights owned, occupied or leased by owners of water or water rights. RATIONALE: Comment: Water rights must be acknowledged.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	21	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT: Range improvement means an authorized physical modification or treatment which is designed to improve production of forage; change vegetation composition; control patterns of use; provide water; stabilize soil and water conditions; restore, protection and improve the condition of rangeland ecosystems to benefit livestock, wild horses and burros, and fish and wildlife. The term includes, but is not limited to, structures, treatment projects, and use of mechanical devices or modifications achieved through mechanical means. Rangeland studies means any scientifically approved study methods accepted by the authorized officer for collecting data on actual use, utilization, climatic conditions, other special events, and trend to determine if management objectives are being met. COMMENTER'S RECOMMENDED NEW TEXT [removing "accepted by the authorized officer"]: Range improvement means an authorized physical modification or treatment which is designed to improve production of forage; change vegetation composition; control patterns of use; provide water; stabilize soil and water conditions; restore, protection and improve the condition of rangeland ecosystems to benefit livestock, wild horses and burros, and fish and wildlife. The term includes, but is not limited to, structures, treatment projects, and use of mechanical devices or modifications achieved through mechanical means. Rangeland studies means any scientifically approved study methods accepted by the authorized officer for collecting data on actual use, utilization, climatic conditions, other special events, and trend to determine if management objectives are being met. RATIONALE: Comment: Methods must adhere to established manuals and not be subject to the opinion of individuals. Secretary means the Secretary of the Interior or his authorized officer.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	20	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT: Public lands means any land and interest in land outside of Alaska owned by the United States and administered by the Secretary of the Interior through the Bureau of Land Management, except lands held for the benefit of Indians. RECOMMENDED NEW TEXT: Public lands means such lands and interest in lands owned by the United States as are subject to private appropriation and disposal under public-land laws. It shall not include "reservations"..... RATIONALE: Comment: Public lands are statutorily defined in the Federal Powers Act of 1920:

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	19	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	<p>OLD TEXT: Monitoring means the periodic observation and orderly collection of data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives.</p> <p>COMMENTER'S RECOMMENDED NEW TEXT: Monitoring means the periodic observation and orderly collection of data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. use of science-based field methods to assess, with qualitative data, the direction of the trend for accomplishment of allotment objectives or the orderly collection of data using scientificallybased techniques to determine the trend or condition of rangeland resources. Data may include historical information, but must be sufficiently reliable to evaluate: (a) Effects of ecological change and management action; and (b) Effectiveness of actions in meeting management objectives. Monitoring shall consider the ecological site potential in assessing the effects of actions in meeting management objectives. RATIONALE: Comments: It is imperative that science based field methods be utilized to establish trends. Periodic observation is just that, periodic, and it does not depict the true picture of what is being 'monitored'. COMMENTER RECOMMENDS DELETION OF PERMITTED USE: Permitted use means the forage allocated by, or under the guidance of, an applicable land use plan for livestock grazing in an allotment under a permit or lease and is express in AUMs. RATIONALE: Comment: 10 year grazing permits make no mention of 'permitted use'. It speaks only of active use and suspended use. Permitted use is not a legal term.</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	17	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	<p>OLD TEXT: Grazing preference or "preference means a superior or priority position against others for the purpose of receiving a grazing permit or lease. This priority is attached to base property owned or controlled by a permittee or lessee. COMMENTER'S RECOMMENDED NEW TEXT: Grazing preference or "preference means the total number of animal unit months legally adjudicated and attached to the qualified base property owned or controlled by the owner of the preference and was specifically authorized by Congress through the Taylor Grazing Act (TGA). Grazing preference includes active use as well as suspended-use. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. RATIONALE: Comment: Preference and grazing preference have double meanings. The proposed new language encompasses both.</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	16	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	<p>OLD TEXT: Grazing permit means a document authorizing use of the public lands within an established grazing district(s) under Section 3 of the Act for the purpose of livestock grazing. Grazing permits specify all authorized use including livestock grazing, suspended use. and conservation use. Permits specify the total number of AUMs apportioned, the area authorized for grazing use. , or both.</p> <p>COMMENTER'S RECOMMENDED NEW TEXT: Grazing permit means a document authorizing use of the public lands within an established grazing district(s). Grazing permits specify all authorized use including livestock grazing and suspended use. Permits specify the total number of AUMs apportioned, the area authorized for grazing use. RATIONALE: Comment: Mention of section 3 of the Act clarifies how the grazing permit originated and continues.</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	15	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT: Grazing lease means a document authorizing use of the public lands outside an established grazing districts. Grazing leases specify all authorized use. including livestock grazing, suspended use, and conservation use. Leases specify the total number of AUMs apportioned, the area authorized for grazing use or both. COMMENTER'S RECOMMENDED NEW TEXT: Grazing lease means a document authorizing use of the public lands outside an established grazing districts under Section 15 of the Act for the purpose of livestock grazing. Grazing leases specify all authorized use. RATIONALE: Comment: Mention of Section 15 of the Act clarifies how the grazing lease originated and continues. Delete the highlighted, marked thru section as it is not needed and conservation use is unlawful.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT: Allotment means an area of land designated and managed for grazing of livestock. COMMENTER'S RECOMMENDED NEW TEXT: Allotment means an area of land designated and adjudicated for grazing of livestock. It is a split estate private property interest protected under the law like any other property right. RATIONALE: Comment: Allotments were adjudicated to 'Allotment Owners' by the Taylor Grazing Act of 1934 when settlement withdrawal we instituted and allotment boundary lines were designated.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT: Allotment management plan (AMP) means a documented program developed as an activity plan, consistent with the definition at 43 U.S.C. 1702(k), that focuses on, and contains the necessary instructions for, the management of livestock grazing on specific public lands to meet resource condition, sustained yield, multiple use, economic and other objectives. COMMENTER'S RECOMMENDED NEW TEXT: Allotment maps are official government surveys and title documents as valid as any "patent". Lane v Watts (1914), Ballinger v Frost (1910), Noble v Union River Logging RR (1893). RATIONALE: Comment: Definition speaks for itself.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	27	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD LANGUAGE: Utilization means the portion of forage that has been consumed by livestock, wild horses and burros, wildlife and insects during a specified period. The term is also used to refer to the pattern of such use. NEW LANGUAGE: Utilization means the percentage of forage that has been consumed at the end of the grazing season or the grazing season whichever is later. RATIONALE: Comment: Utilization must be held to a specified period. The current definition is open-ended and arbitrary. Valid existing rights----Define valid existing rights.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Objectives do not include the equitable distributions of forage between wildlife and livestock. Action Requested Action: Guidelines and Objective should conform to the multiple-use management concept for public lands through the equitable distribution of resources, including available forage between wildlife, livestock, and, when applicable, wild horses and burros.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Olson	Vicki		MT	941	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Next is the Def. of “Interested public”. This should be anyone gets information and comments during comment periods. They should not be able to appeal every action implemented on an allotment plan or other grazing actions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	30	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Monitoring: the regulations should specify "quantitative data" so that the definition reads: "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. We support requiring monitoring to identify ecological site and current ecological site potential, as shown by state and transition modeling, when assessing effects of management actions and effectiveness of management actions in reaching objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Interested public: In the current definition, please remove "involved in the decision making process". The WSGB also recommends that the definition of the term "interested public" be redefined in the revised Grazing Regulations as, " an individual, group or organization that has submitted in writing to the AO a request to provide comments to the AO on the management of livestock grazing on specific allotments, and who has been determined by the AO to be an "interested public", and has the right to provide comments on BLM grazing activities."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	11	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	In the current definition of "monitoring", please add the word "quantitative" in front of the phrase "data to evaluate". The WSGB supports the retention of items (1) and (2) as now written.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	In the current definition of "Grazing permits", please remove the term "conservation use" and add at this location, " and the terms and conditions including the flexibility on issues decided by joint agreement between the local BLM and the permittee".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	In the current definition of "active use", please remove the term "permitted use". The WSGB will offer later in this document, some additional comments on our recommendation to remove the term "permitted use" from revised BLM Grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	In the current definition of "active use", please remove the term "permitted use". The WSGB will offer later in this document, some additional comments on our recommendation to remove the term "permitted use" from revised BLM Grazing regulations.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	In the current definition of " Cancelled or cancellation", please remove the phrase "and grazing preference" from this definition. It is the opinion of the WSGB, that, only congress, the Secretary of Interior, or someone in his/her office appointed by the president as per language at Section 204 of the FLPMA, are the only government employees that have the authority to "cancel" all or part of the preference level of Section 3 AUMs or the priority position, of the legally adjudicated AUM's attached to qualified base property, and even he/she would need to go thru the process described in the FLPMA to accomplish this task. Please remove the definition of the term "conservation use" and remove this term from thru-out the regulations. The bLM Grazing Regulations should not contain any reference to 'Conservation use". The WSGB comments that a new definition of the term " Fully processed grazing permit" now be included in the BLM Grazing Regulations to read: " A BLM Grazing permit will have been considered as "fully processed" if the AO has determined that the grazing permit to be reissued is in compliance with the BLM Grazing Regulations."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	26	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Grazing preference and preference: Restore pre-1995 definitions including a priority position for renewal of a grazing permit. Permits should recognize and restore AUMs levels reduced solely as a result of application of the 1995 change in definition. This does not suggest that AUM changes made as a result of monitoring or other range conditions should not be changed without proper analysis. Suggested language: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension, and other authorized forms of use. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Liroky	Roger		MT	1398	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Finally, multiple use management needs less emphasis, not more. I fail to see where allowing widespread recreation use of ATV's, etc. on BLM lands is beneficial to the range resource. Hunters, wildlife enthusiasts need to walk - that is the most effective way to conduct a hunt or enjoy the outdoors.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	28	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Conservation use: Conservation use should be removed from the regulations to comply with the opinion of the U.S. District Court for the District of Wyoming (Public Lands Council v. Babbitt, 929 F. Supp. 1436 (D. Wyo. 1996), and upheld by the Tenth Circuit Court of Appeals (Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir. 1999), which found that the term supersedes the BLM's authorities under the Taylor Grazing Act.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	12	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Conservation use means an activity, excluding livestock grazing, on all or a portion of an allotment for purposes of- (1) Protecting the land and its resources from destruction or unnecessary injury; (2) Improving rangeland conditions; or (3) Enhancing resource values uses, or functions. RATIONALE: Comment: Conservation use was ruled unlawful in the court case PLC vs Babbitt (98-1991) 529 U.S. 728 (2000) 167 F.3d 1287, affirmed. OLD TEXT: Consultation, cooperation and coordination means interaction for the purpose of obtaining advice, or exchanging opinions on issues, plans, or management actions. COMMENTER'S RECOMMENDED NEW TEXT: Consultation, cooperation and coordination an interactive process for advice, seeking advice, agreement or interchange of opinions on issues, plans or management actions from other agencies and affected permittee(s) or lessee(s), landowners involved, the district grazing advisory board, affected counties, any State having lands within the area to be covered by a allotment management plan, activity plan or allotment objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	COMMENTER'S RECOMMENDED NEW TEXT: Affected Interest means an individual or organization that has expressed in writing to the authorized officer concern for the management of livestock grazing on a specific grazing allotments and who has been determined by the authorized officer to be an affected interest. RATIONALE: Comment: Replace "Interested Public". Affected interests must show a vital interest. Affiliate means an entity of person that controls, is controlled by, or is under common control with, and applicant permittee or lessee. The term "control" means having any relationship which gives an entity or person authority directly or indirectly to determine the manner in which an applicant, permittee or lessee conducts grazing operations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	11	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	COMMENTER'S RECOMMENDED NEW DEFINITION FOR CATEGORICAL EXCLUSIONS: Categorical exclusion means a category of actions which do not individually or cumulatively have a significant effect on the human environment and which have been found to have no such effect in procedures adopted by a Federal agency in implementation of these regulations (§1507.3) and for which, therefore, neither an environmental assessment nor an environmental impact statement is required. An agency may decide in its procedures or otherwise, to prepare environmental assessments for the reasons stated in §1508.9 even though it is not required to do so. Any procedures under this section shall provide for extraordinary circumstances in which a normally excluded action may have a significant environmental effect. RATIONALE: Comment: This definition is required for proposed text in the body of these regulations. Class of livestock means ages and/or sex groups of a kind of livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	COMMENTER'S RECOMMENDED NEW DEFINITION FOR ALLOTMENT OBJECTIVES: Allotment Objectives means allotment specific measurable proposed outcomes for rangeland resource parameters and other items that contribute to the sustainability of the permittees and/or the lessees on the allotment after a process of careful and considered consultation, coordination, cooperation, between the permittees or lessees, affected counties, State Trust Lands and the BLM. RATIONALE: Comment: Objectives must be measurable and not subjective. Animal unit month (AUM) means the amount of forage necessary for the sustenance of one cow or its equivalent for a period of 1 month.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	14	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	COMMENTS RECOMMENDS NEW DEFINITION FOR EXTRA ORDINARY CIRCUMSTANCE: Extra Ordinary Circumstance means those circumstances listed in Section 6.204 of the National Environmental Policy Act that may cause a significant environmental effect such that a proposed action that otherwise meets the requirements of a categorical exclusion may not be categorically excluded.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	13	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	COMMENTS RECOMMENDS NEW DEFINITION FOR COORDINATION: Coordination means interacting government to government as equals, of the same order, rank, or degree of importance as it applies to the Bureau of Land Management, State, Tribal and Local Governments. Not subordinate. RATIONALE: Comment: "Coordination" is a process that allows local governments to ensure conflicts with their plans and policies are resolved. Because coordination is a government-to-government relationship, it is not an appropriate forum for the public to engage the administrative agencies as they have no governmental responsibilities to fulfill. The coordination process allows local governments to negotiate with the agencies in an open public format with a quorum of the elected body present, which they must do in order to comply with state open meeting laws.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	24	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	COMMENTS RECOMMENDS DELETION OF SUSPENSION: Suspension means the temporary withholding from active use, through a decision issued by authorized officer or by agreement, of part or all of the permitted use in a grazing permit or lease. COMMENTS RECOMMENDS ADDING SUSPENDED USE: Suspended Use means temporarily withholding in whole or in part, a grazing preference from active grazing use in a grazing permit or lease. The withholding may be done voluntarily by the permittee or lessee or through a decision issued by authorized officer or by agreement, of part RATIONALE: Comment: A grazing preference is the basis for a permit. The grazing preference contains active use and suspended use, not permitted use. The permittee or lessee has the discretion to temporarily use or not use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	18	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Comment: Allotments are NOT public lands in regards to the surface/forage use. They have been adjudicated and appropriated; hence, disposed of by public-land laws. Therefore, the 'interested public' has no right, title or interest as defined by the TGA nor do they have the expertise in the management of livestock grazing. COMMENTS RECOMMENDS ADDING IMPOUNDMENT: Impoundment means to seize and retain in custody of unauthorized livestock on public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	23	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	COMMENT RECOMMENDS ADDING SUBLEASING: Subleasing means- the act of a permittee or lessee entering into an agreement that either: (1) allows someone other than the permittee or lessee to graze livestock on public lands without controlling the base property the base property supporting the permit or lease or (2) allows grazing on the public lands by livestock that are not owned and controlled by the permittee or lessee. To sublease, the authorized officer must be supplied with documentation that verifies the arrangement and specifies who is responsible for maintaining the terms and conditions of the permit. RATIONALE: Comment: Allotments are owned and said ownership is recognized by banks, the IRS, etc. Allotment owners have the right to sell, pass to heirs and/or 'sublease'.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	15	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Carrying capacity: The phrase "carrying capacity" should be changed to "Domestic livestock carrying capacity" and be defined as: Domestic livestock carrying capacity is a quantifiable number of Animal Unit Months as determined by rangeland studies on a sustainable yield basis that will not induce damage to vegetation or related resources.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Base property: Please remove item (1) in the current Regulations that now says, " Land that has the capability to produce crops or forage that can be used to support authorized livestock for a specified portion of the year". Our justification for this recommendation is that item (1) is an archaic concept related to "commensurability" that is no longer supported by either the BLM or the WSGB. BLM, to our knowledge, does not do what item (1) requires them by Regulation to actually do when the BLM assesses whether or not base property offered by an applicant is adequate.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Authorized officer means any person authorized by the Secretary to administer regulations in this part. Base property means: (1) Land that has the capability to produce crops or forage that can be used to support authorized livestock for a specified period of the year, or (2) water that is suitable for consumption by livestock and is available and accessible, to the authorized livestock when the public lands are used for livestock grazing. OLD TEXT: Cancelled or cancellation means a permanent termination of a grazing permit or grazing lease and grazing preference, or free-use grazing permit or other grazing authorization, in whole or in part. COMMENTER'S RECOMMENDED NEW TEXT: Cancelled or cancellation means a permanent termination of a grazing permit or grazing lease or free-use grazing permit or other grazing authorization, in whole or in part. RATIONALE: Comment: The grazing preference was adjudicated when the allotments were created effectively stopping settlement of the federal lands. Such cancellation may be considered a 'takings'.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	14	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	At 4100.0-7 Cross Reference, the WSGB recommends removal in the second sentence that Land use Plans, LUP's, shall "establish" allowable resource uses. We recommend this sentence say, " Land Use Plans shall provide guidelines for allowable resource uses ... ", because a Regulation that says that LUP's shall "establish" allowable resources is contrary to the use of the concept of adaptive management by the State and local BLM offices and diminishes the influence of State and local County governments during the preparation of LUP's.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miyamoto	Doug	Wyoming Department of Agriculture	WY	910	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	4100.5 - Definitions -Livestock or kind of livestock means species of domestic livestock -cattle, sheep, horses, burros, and goats. " We would support making this much more flexible, and Include other species such as bison and llama. There are a number of bison ranches in eastern Wyoming where producers could potentially benefit from BLM permits. Uama are regularly used In conjunction with sheep for guardian animals. -Grazing Preference or preference "means a superior or priority position against others for the purpose of receiving a grazing permit or lease. This priority is attached to base property owned or controlled by the permittee or lessee. We ask for clarity on the grazing preference definition to clearly Include active use and use held In suspension as part of the definition. This Is especially applicable to 4110.3, which goes beyond base property and requires monitoring, documented field observations, ecoioglcalslte Inventory, or other data acceptable to the authorized officer as well as the National Environmental Policy Act (NEPA).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	28	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	<p>§4100.0-7 Cross-references. The regulations at part 1600 of this chapter govern the development of land use plans; the regulations at part 1780, subpart 1784 of this chapter govern advisory committees; and the regulations at subparts B and E of part 4 of this title govern appeals and hearings. OLD TEXT: §4100.0-8 Land use plans. The authorized officer shall manage livestock grazing on public lands under the principle of multiple use and sustained yield, and and in accordance with applicable land use plans. Land use plans shall establish allowable resource uses (either singly or in combination), related levels of production or use to be maintained, areas of use, and resource condition goals and objectives to be obtained. The plans also set forth program constraints and general management practices needed to achieve management objectives. Livestock grazing activities and management actions approved by the authorized officer shall be in conformance with the land use plan as defined at 43 CFR 1601.0-5(b). NEW TEXT [adding "allow for adaptive management"]: §4100.0-8 Land use plans. The authorized officer shall manage livestock grazing on public lands under the principle of multiple use and sustained yield, and allow for adaptive management, and in accordance with applicable land use plans. Land use plans shall establish allowable resource uses (either singly or in combination), related levels of production or use to be maintained, areas of use, and resource condition goals and objectives to be obtained. The plans also set forth program constraints and general management practices needed to achieve management objectives. Livestock grazing activities and management actions approved by the authorized officer shall be in conformance with the land use plan as defined at 43 CFR 1601.0-5(b). RATIONALE: Comment: Adaptive management is critical to a ranching unit so that they can 'adapt' to yearly changes. [53 FR 10233, Mar. 29, 1988]</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	<p>§4100.0-2, Objectives - IFBF recommends that the objectives for the rules clearly and directly tie back to the statutory objectives listed in the TGA, FLPMA and PRIA without any additions or expansions. Specifically, economic objectives, including preventing "economic disruption and harm to the western livestock industry" and "manag(ing), maintain(ing) and improv(ing) the condition of the public rangelands so that they become as productive as feasible for all rangeland values" as stated in PRIA, should be given equal importance with any other objectives.</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329		Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	<p>§ 4100.0-5 Definitions. Whenever used in this part, unless the context otherwise requires, the following definitions apply: The Act means the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.c. 315, 315a-315r). Active use means the current authorized use, including livestock grazing and conservation use. Active use may constitute a portion, or all, of permitted use. Active use does not include temporary nonuse or suspended use of forage within all or a portion of an allotment. "Rather than annually evaluating range conditions to determine whether grazing levels should increase or decrease, as is done with temporary non-use, the Secretary's conservation use rule authorizes placement of land in non-use for the entire duration of 0 permit. This is an impermissible exercise of the Secretary's authority under section three of the TGA because land that he has designated as "chiefly valuable for grazing livestock" will be completely excluded from grazing use even though range conditions could be good enough to support grazing. Congress intended that once the Secretary established a grazing district under the TGA, the primary use of that land should be grazing . . . We hold that the Secretary lacks the statutory authority to issue grazing permits intended exclusively for conservation use. Because there is no set of circumstances under which the Secretary could issue such a permit, the new conservation use regulation is invalid on its face". (Public Lands Council v. Babbitt, 167 F.3d 1287) Activity plan means a plan for managing a resource use or value to achieve specific objectives. For example, an allotment management plan is an activity plan for managing livestock grazing use to improve or maintain rangeland conditions. Actual use means where, how many, what kind or class of livestock, and how long livestock graze on an allotment, or on a portion or pasture of an allotment. Actual use report means a report of the actual livestock grazing use submitted by the permittee or lessee. Adaptive resource management (adaptive management) means treating management as an adaptive learning process, where management activities themselves are viewed as the primary tool for experimentation; this requires developing scientifically defensible data to evaluate management outcomes associated with specific management objectives and to inform potential changes in management. Affiliate means an entity or person that controls, is controlled by, or is under common control with, an applicant, permittee or lessee. The term "control" means having any relationship which gives an entity or person authority directly or indirectly to determine the manner in which an applicant, permittee or lessee conducts grazing operations. This definition of control is different than the one below. It is unclear on the need for an "affiliate" to be part of permitted grazing, if they are not a applicant, permittee or leasee, what is the purpose? An example</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360		Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	<p>§ 4100.0-5 Definitions. Whenever used in this part, unless the context otherwise requires, the following definitions apply: The Act means the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.C. 315, 315a-315r). OLD TEXT: Active use means the current authorized use, including livestock grazing. and conservation use. Active use may constitute a portion, or all, of permitted use. Active use does not include temporary nonuse or suspended use of forage within all of a portion of allotment. COMMENTER'S RECOMMENDED NEW TEXT: Active use means the current authorized use, including livestock grazing. Active use may constitute a portion, or all, of the grazing preference. Active use does not include temporary nonuse or suspended use of forage within all of a portion of allotment. RATIONALE: Comment: Conservation use was ruled unlawful in the court case PLC vs Babbitt (98-1991) 529 U.S. 728 (2000) 167 F.3d 1287, affirmed. The grazing preference is the total number of AUM's that were allotted to a particular allotment when the allotments were adjudicated subsequent to the passing of the Taylor Grazing Act of 1934. The preference does not change even though the active use may.</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360		Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	§ 4100.0-2 Objectives. The objectives of these regulations are to promote healthy a sustainable rangeland ecosystem; to accelerate restoration and improvement of public rangelands to properly functioning conditions; to promote orderly use, improvement and development of the public lands; to establish efficient and effective administration of grazing of public rangelands; and to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, healthy public rangelands. These objectives shall be realized in a manner that is consistent with land-use plans, multiple use, sustained yield, environmental values, economic and other objectives stated in 43 CFR part 1720, subpart 1725; the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.C. 315, 315a-315r); section 102 of the Federal Land Policy Management Act of 1976 (43 U.S.C. 1740). [60 FR 9960, Feb. 22, 1995] COMMENTER'S RECOMMENDED NEW TEXT: § 4100.0-2 Objectives. The objectives of these regulations are to enhance a sustainable rangeland ecosystems; to improve resource conditions; to promote orderly use, and development of the public lands; to establish efficient and effective administration of grazing of public rangelands; and to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, sustainable public rangelands. These objectives shall be realized in a manner that, reflects multiple use, sustained yield, environmental values, economic and other objectives stated in 43 CFR part 1720, subpart 1725; the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.C. 315, 315a-315r); section 102 of the Federal Land Policy Management Act of 1976 (43 U.S.C. 1740) and the Public Rangeland Improvement Act of 1978 (PRIA) (Pub.L. 95- 514). [60 FR 9960, Feb. 22, 1995] RATIONALE: Comment: Define or remove "health" or "healthy". The term is subjective and is not based on sound science. Health can mean different things to different people and is generally associated with 'human health'. PRIA is an integral part of the grazing law and must be referenced and must be included.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387		Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	" The proportion of current years forage production consumed or destroyed by grazing animals." (This is from the Society for Range Management, Glossary of terms used in Range Management, 4th edition, pg. 30) The WSGB recommends removal from the current definition in the Regulations of any reference to "seasonal utilization" or "pattern of use" because neither of these two criteria are supported by the SRM.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallidge	Samuel		NM	1319		Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	We recommend use of quantitative data collected by scientifically defensible methods in monitoring rangelands. Qualitative data collected using objective and repeatable methods in conjunction with the collection of quantified data can provide visual reference or promote understanding of analyses and interpretations of quantified data. OLD TEXT Monitoring means the periodic observation and orderly collection data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. NEW TEXT Monitoring means the systematic collection of objective, repeatable and quantified data designed to evaluate specific rangeland ecological attributes as informed by management objectives. Monitoring methods must be scientifically defensible, are consistent, continuous, and comparable, describe natural range of variability, inferential space for interpretation and specific analyses to evaluate: (1) Effects of grazing or rangeland improvement management actions; and (2) Effectiveness of actions in meeting grazing management objectives. (3) Informs adaptive resource management.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	We recommend a change in the definition of "preference." We recognize the authority of the Secretary, and by delegation the BLM, the authority to adjust active use for cause. But in this definition, we opine that "preference" was legally adjudicated to the qualified base property owned or controlled by the owner of that "preference" and as such, neither the Secretary of the Interior nor BLM officials have the legal right to cancel a "preference."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keeler	Murray & Judy		NM	1018	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	We pray "valid existing rights" will be defined and incorporated into the proposed grazing revisions so economic stability and the social well-being of the ranching communities in New Mexico, can be established once again.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Adams	Chase	American Sheep Industry Assn	CO	1031	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	We also believe that in order to more fully integrate stakeholder input, the definition of "Affected Interest" should be updated to reflect: "Affected Interest" means an individual or organization in possession of a Preference grazing right as defined in 43CFR § 4100, or its equivalent."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Thompson	Troy	Wyoming County Commissioners Association	WY	881	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	WCCA asks that the agency revise the regulations to recognize the importance of grazing preference in the use and renewal of grazing permits. BLM should redefine "preference" or "grazing preference" to include both a priority position for renewal of a grazing permit and the level of AUMs that were established for that permit. Grazing preference ensures that, as conditions allow, permit holders may graze at historically permitted levels and are recognized for long-term grazing when applying for renewals. This will ensure that grazing on public lands continues into the future
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frandsen	Fred	Washakie County Commissioners	WY	1246	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Washakie County asks that the agency revise the regulations recognize in importance of grazing preference in the use and renewal of grazing permits. BLM should redefine "preference" or "grazing preference" to include both a priority position for renewal of a grazing permit and the level of AUMs that were established for that permit. Grazing preference ensures that, as conditions allow, permit holders may graze at historically permitted levels and are recognized for long-term grazing when applying for renewals. This will ensure that grazing on public lands continues into the future.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klump	Levi	Hidalgo County Cattle Growers Association	NM	1054	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Valid Existing Rights should be defined.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keck	John E.			1482	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Valid Existing Rights PL 94-579 Sec 701(a) must be clearly defined.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Utilization: The current definition results in many improper interpretations of utilization data because it implies that a given level of utilization (e.g., 55%) has the same effect on the grazed plants, regardless of when it occurs across the annual growth cycle. Plants go through numerous developmental stages during their annual growth cycle, and in these stages they produce or consume energy quite differently. Early in the season perennial grasses may have only a leaf or two per tiller and be growing slowly, but also may have substantial residual matter (dead leaves and stems) left from the previous growing season. As the season progresses, these same plants have a rapid vegetative growth stage, followed by the boot stage, and yet later by seed production, and eventually dormancy when all above-ground portions of the plant are dead. During dormancy, the only live portion of the plant are its roots and the buds on the root crown and at the base of old (dead) tillers, where the tiller connects to the root crown. Each growth stage will respond to the same level of utilization differently (Anderson and Frank 2003, Wilson et al. 1965, McLean and Wikeem 1985; Ganskopp 1988, Clark et al. 1998). Plants that are dormant can be grazed nearly to ground level without being adversely affected because only dead material is removed. During the boot stage, much smaller rates of utilization can be very detrimental. For utilization to be an effective tool it must include data about the stage(s) of plant growth (often called time of grazing) during which grazing occurs, and the opportunity for the grazed plants to grow before being grazed and/or regrow after being grazed, including any growth the next season, before being grazed once again. Without a full understanding of the biological setting of the grazed plants, utilization alone, as currently defined will always result in incorrect interpretation of the data and its effects on grazed systems, and far from the best grazing management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Buzzetti	Rachel	Central Committee of Nevada State Grazing Boards		1158	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Utilization-- The definition of the term "utilization" should be edited to read as follows: "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season. May refer either to a single species or to the vegetation as a whole." BLM should delete the reference in the current "utilization" definition to a "specific period" and the vague term "pattern of use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	ortega	adam	Colorado Department of Agriculture	CO	981	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Utilization means the portion of forage that has been consumed by livestock, wild horses and burros, wildlife and insects during a specified period. The term is also used to refer to the pattern of such use. Specify that this refers to the portion of annual forage growth. Forage utilization and pattern of use should be determined on actual use of annual forage production
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	17	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Utilization - This definition should be modified to read: the portion of annual forage production that has been consumed by livestock. The term is also used to refer to the pattern of such use.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Utilization This definition needs updated with greater specificity so that it is not misapplied in the management of grazing permits as it has been in the past. The new definition should read: "Utilization means the portion of the current year's forage that has been consumed by grazing animals taken at the end of the grazing season or at the end of the growing period, whichever is later."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eisenach	Kurt	Wyoming Wild Sheep Foundation		1161	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Unauthorized Use We will require a better understanding and definition of "incidental" and "non-willful" to support this change to the current regulation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The WSGB recommends that the term, "base of operations" be added to the Grazing Regulations and be defined as: " Non-federal land determined by the AO to be the base of operations for livestock in a grazing permit when they are not authorized by the AO to graze on Federal BLM lands."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The WSGB recommends that a definition of "Carrying capacity" be changed in the BLM Grazing Regulations to read as follows: " The carrying capacity for livestock on Federal lands is the number of livestock that may be sustained on a management unit without inducing damage to vegetation or related resources as determined from quantitative monitoring data over time. In addition to consideration of the variety of rangeland ecological site characteristics on an area, including the capability of an area to sustain adequate forage production, it is a function of management goals and measurable objectives, and the availability of adequate rangeland improvements including quality and quantity of water, plant species composition including seasonal availability of poisonous plants, competition from other users of available forage, and livestock management intensity."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	11	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The WSGB comments that a new definition of the term " Fully processed grazing permit" now be included in the BLM Grazing Regulations to read: "A BLM Grazing permit will have been considered as "fully processed" if the AO has determined that the grazing permit to be reissued is in compliance with the BLM Grazing Regulations."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The term "Healthy Rangelands" requires a clear definition. Only with said definition can all parties, individuals and organizations approach being on the same page when they use the term. Healthy rangelands have critical ecological processes and mechanisms in place so that desired plant species have the opportunity to establish and control plant successional processes, indefinitely. Rangeland health is not the mere presence of specific species, proportions of species, or structure of the vegetation. Those would be management goals and objectives, within the context of a healthy rangeland

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	11	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The pre-1994 grazing rules referred to "preference" as the grazing use adjudicated by BLM after the Taylor Grazing Act ("TGA"). Those rules defined the term "grazing preference" as "the total number of animal unit months of livestock grazing on public lands apportioned and attached to base property owned or controlled by the permittee or lessee." 43 C.F.R. § 4100.0-5 (1994). "Grazing preference" included "active use," defined as "the current authorized livestock grazing use," id., which was based on the amount of forage available under the governing land use plan as well as "suspended use" which could be converted to active use should the rangeland's carrying capacity increase. Id. § 4110.2-2(a)(1994). The 1995 rules, however, removed "suspended use" from the definition of grazing preference. See 43 C.F.R. § 4100.0-5 (1995). The Proposed Rule should return to the 1994 rules which correctly reflected historic grazing adjudications under the TGA and retained grazing preference while "permitted use" determined the number of authorized livestock. Historic grazing numbers should be used in every grazing decision as the presumptive analytical benchmark for all grazing decisions. This will allow field offices to manage livestock grazing decisions, forage, and wildlife habitat with greater flexibility as conditions permit. Too often, resource management plans ("RMP") do not reflect significantly dissimilar conditions, such as improved forage, with greater grazing allocations and thus when conditions permit, the BLM is hamstrung by its own document. For example, objectives set in RMPs may reflect resource conditions during times of drought and, therefore, when conditions improve drastically the RMP does not grant the BLM the necessary ability to increase grazing numbers, change seasons of use, or otherwise adjust management. The Propose Rule should allow for the greatest spectrum of use possible by recognizing grazing adjudications that should be fully issued if conditions permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The Livestock Groups propose the following updated definition of "Affected Interest" in order to effectively distinguish the comments and allow the agency to appropriately respond to permittees and their inherent commitment and investment in the public land resource: "Affected Interest" means an individual or organization in possession of a Preference grazing right as defined in 43CFR § 4100, or its equivalent."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The land is not owned by the 'public', but is held in trust and managed for multiple use on behalf of the public. The public in general is not affected and does not have a vested/economic interest, nor does it have right, title, or interest as defined by the Taylor Grazing Act of 1934 (TGA). Therefore, 'interested public' should be taken out of the equation. This would streamline the process while meeting NEPA and legal requirements.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallidge	Samuel		NM	1319	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The definition of Animal Unit Month attempted to combine the scientifically established concepts of Animal Unit and Animal Unit Month (Society for Range Management 1998). We recommend defining animal unit month separately from animal unit. OLD TEXT: Animal unit month (AUM) means the amount of forage necessary for the sustenance of one cow and her calf up to 6 months of age or its equivalent for a period of 1 month. NEW TEXT: Animal unit month (AUM). The amount of oven-dry forage (forage demand) required by one animal unit for a standardized period of 30 animal-unit-days.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	The definition of "grazing preference or preference" should be restored to its pre-1995 version and include a priority position for renewal of a grazing permit. The amended definition should also recognize and restore the level of AUMs that were established for the grazing permit for permits that were decreased solely as a result of application of the 1995 definitional change; AUM changes, including increased AUM apportionments, that were made as a result of monitoring or other range conditions should not be adjusted as a result of the Livestock Groups' suggested definitional change -except through regularly scheduled land planning processes. Based on the prior regulations, the definition should be: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension, and other uses as authorized under these regulations and provided in agency guidance and policy. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallidge	Samuel		NM	1319	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Society for Range Management (1998) defines utilization (use) as the proportion of current year's forage production that is consumed or destroyed by grazing animals. As previously defined by the BLM grazing regulations, it refers to seasonal use, a relative estimate, that lacks scientifically validated metrics by which to assess grazing outcomes or ecological impacts. Estimates of seasonal use may be appropriate for adjusting animal distribution during a grazing period, but should not be used as a rigid standard or to trigger livestock removal. Utilization is measured at the end of the growing season when estimates of forage production are available. It should be recognized that accurately meeting specific use levels on an annual basis is nearly impossible and assessing use levels is best applied when averaged over a 5 to 10 year period (Holechek and Galt 2000). It is not appropriate to use utilization estimates as a grazing objective (Holechek and Galt 2000, Smith et al. 2007) or to use utilization guidelines in association with seasonal use estimates. Smith et al. (2007) indicate it is inappropriate to set different use levels for different range condition classes not supported by research. Utilization guidelines applicable to grasslands may not be applicable to shrub dominated or annual rangelands. Further, utilization estimates indicate livestock grazing pressure only and should not be assumed to relate to other uses or resource attributes in the absence of supporting research. Utilization estimates or mapping use zones employing objective, repeatable and quantitative methods over a long time- period may be used with other quantified data to inform rangeland management planning. OLD TEXT Utilization means the portion of forage that has been consumed by livestock, wild horses and burros, wildlife and insects during a specified period. The term is also used to refer to the pattern of such use. NEW TEXT Utilization means the portion of annual forage production that has been consumed by livestock, wild horses and burros, wildlife and insects.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Section 4100.0-8 Land use Plans: The phrase "shall establish resource condition goals and objectives to be obtained" must be used in the context of the potential of the specific site or management unit, given the bio-physical constraints of the area today, not on perceived potential based upon speculation for what was present prior to settlement. Some areas have crossed thresholds and cannot readily progress back to pre-settlement states with only a change in management. Good management today, based upon the current biophysical state may permit slow change in a desired direction, but what was present in the past is not always achievable in planning and management timeframes.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Rosemary			1194	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Section 4100.0-5 Definition of Conservation Use It is unfair to have a double standard for grazing and recreational uses. Grazing must focus on protecting the land and its resources from destruction or unnecessary injury. The same must apply to recreational use; therefore, regulations must be added for the out-of-control recreational use. This will help to insure that this use will also protect the land and its resources from destruction or unnecessary injury and improve rangeland conditions. Their oversight and especially OHV usage has been neglected in the past and has adversely impacted our rangeland.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Replace Definition for "Utilization" - "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season. May refer either to a single species or to the vegetation as a whole." Utilization should be determined by user type as much as possible (i.e. managed livestock grazing vs. equid grazing vs. wildlife users).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Replace Definition for "Monitoring" - "Monitoring" means the periodic observation and orderly collection of quantitative data to evaluate..."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Replace Definition for "Interested public" - "Interested public means an individual, group or organization that has submitted written comments to the BLM raising specific concerns during the public comment period regarding the adoption or renewal of an allotment management plan or other grazing management prescriptions, and has requested in writing to the Authorized Officer to be an interested public on one or more allotments."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Replace Definition for "Grazing Preference" - "Grazing preference or preference means the total number of animal unit months on public lands adjudicated and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Replace Definition for "Consultation, cooperation, and coordination" - "Consultation, cooperation and coordination means an interactive process for seeking advice, agreement, or interchange of opinions on issues, plans, or management actions from other agencies and effected permittees or lessees, landowners involved, the district grazing advisory boards where established, any state having lands within the area to be covered by an allotment management plan and other affected interests."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallidge	Samuel		NM	1319	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Recommended definition additions: Adaptive Resource Management: is an iterative process using data collected through rigorously applied scientific monitoring methods to compare management objectives against outcomes for informing changes to existing management practices. By formally acknowledging affected stakeholders' unique circumstance, the agency will improve stakeholder investment in management partnership and effects resulting in improved ecological outcomes. Additionally, recognition will promote trust among affected stakeholders and the agency. We recommend defining affected stakeholder as: Affected Stakeholder: is an individual or entity in possession of a contract, lease or permit, right- of-way, easement or private property whose investment, management, earnings or livelihood may be effected by a federal action. Animal-Unit: is considered one mature cow of about 1,000 pounds (450 kg), either dry or with calf up to 6 months of age, or their equivalent, consuming about 26 pounds (12 kg) of forage-per-day on an oven-dry basis. See Society for Range Management 1998. Animal-Unit-Day: is the forage demand (amount of forage) on an oven-dry basis required by one animal unit for a period of one day. See Society for Range Management 1998. Landform: is a general description of physiognomy of an immediate landscape (hill, North Slope, riparian, etc.). Rangeland Ecological Attribute: is a quantifiable element of soil, water and vegetation important to inventorying or monitoring rangeland ecosystems. Rangeland management: is the manipulation of rangeland components based on ecological principles and the use of rangelands and range resources to obtain goods and service for society and future generations. See Holechek et al. 2011. Scientific Defensibility: is a standard referring to information obtained following objective, repeatable and quantitative or qualitative data collection methods, analyze data in statistically sound manner, logically applies inferential space in interpretation and addresses the natural range of variability associated with all natural processes. Methods of data collection, data analysis and interpretation that apply to this definition have been validated through an independent peer- review process. Stocking Rate. is the relationship between the number of animals and the grazing management unit utilized over a specified time period. May be expressed as animal units per unit of land area (animal units over a described time period per area of land). See Society for Range Management 1998. Sustained Yield means the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources without impairment of the productivity of the land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallidge	Samuel		NM	1319	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Recommended changes to the definition of trend. OLD TEXT Trend means the direction of change over time, either toward or away from desired management objectives. The data collection, methods, place and timing should be specific for grazing, because data collection designed for other purposes may not be applicable to evaluating grazing management objectives. NEW TEXT Trend means the direction of change over time, either toward or away from desired management objectives and can only be determined with objective, repeatable and quantitative data collected consistently over multiple years. The data collection, methods, place and timing should be specific for grazing, because data collection designed for other purposes may not be applicable to evaluating grazing management objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallidge	Samuel		NM	1319	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Recommended changes to the definition of rangeland studies. OLD TEXT Rangeland studies means any study methods accepted by the authorized officer for collecting data on actual use, utilization, climatic conditions, other special events, and trends to determine if management objectives are being met. NEW TEXT Rangeland studies means scientifically defensible methods supported by rangeland management science for collecting rangeland attribute data for analysis, estimating available forage, and developing trends to determine or inform management.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallidge	Samuel		NM	1319	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Recommended changes to the definition of interested public. OLD TEXT: Interested public means an individual, group or organization that has submitted a written request to the authorized officer to be provided an opportunity to be involved in the decisionmaking process for the management of livestock grazing on specific grazing allotments or has submitted written comments to the authorized officer regarding the management of livestock grazing on a specific allotment. NEW TEXT: Interested public means an individual, group or organization that has submitted a written request to the authorized officer to be provided an opportunity to be involved in the NEPA process and do not meet the definition criteria of an affected stakeholder.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Rangeland studies: as written, an authorized officer has tremendous leeway to accept or reject any study. The regulations do not state the methods used in a study must be methods widely used/accepted by the range management profession. Rather, only that the methods be accepted by the authorized officer. This can lead to individual bias by an authorized officer. There needs to be recognized methodologies that are accepted by the agency, regardless of who the authorized officer is, and who is submitting them, as long as it can be demonstrated the data were collected without purposeful bias (everyone has some level of inherent bias, regardless of how well they control it). Rangeland studies need to be implemented by qualified individuals/organizations, who are intimately familiar with the rangeland systems on which they are collecting the data. This is particularly critical if they also are interpreting the data. The authorized officer also needs to be qualified to interpret rangeland/grazing data and apply the existing science base to the decision process. The authorized officer, therefore, should have to meet the same education and training qualifications as a range management specialist.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Range Improvement: The title of the chapter is Range Management, and since this section addresses wild horses and burros, livestock and fish it obviously includes more than Grazing Administration for just livestock. What is not addressed is how the general public use rangelands and how their actions may result in rangeland degradation, or how that use may or may not adversely affect livestock and grazing management. In today's world range improvements need to include actions or structures that benefit people management and reduce their adverse effects toward livestock and grazing management. Permittees should not be held accountable or have to take corrective actions for the actions of people who use rangelands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	15	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Public Lands - IFBF recommends deleting the definition of Public Lands in these rules as it is inconsistent with statutory definitions of public lands. Although FLPMA does include this definition of public lands, FLPMA clearly states that its definitions do not alter "in any way the meaning of" the defined terms "as used in any other statute, whether or not such statute is referred to in, or amended by, this Act." The more common statutory definition of public lands is "lands that have not been reserved or withdrawn from settlement, sale, location or entry under some or all of the general land laws." Under this statutory definition, practically no federally administered lands qualify anymore as "public lands."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keeler	Murray & Judy		NM	1018	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Preferential use needs to be defined. The grazing allotments were legally adjudicated in the 1940's to either qualified base property owners or to the owners of the improved water developments. Preferential use was established following this adjudication process.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keeler	Murray & Judy		NM	1018	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Preferential use needs to be defined. The grazing allotments were legally adjudicated in the 1940's to either qualified base property owners or to the owners of the improved water developments. Preferential use was established following this adjudication process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Please remove the definition of the term "conservation use" and remove this term from thru-out the regulations. The bLM Grazing Regulations should not contain any reference to 'Conservation use".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Please add a definition of "Affected citizen" to the BLM Grazing Regulations. The term "affected citizen" is used in the Federal Land Planning and Management Act in the definition of "public involvement"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Buzzetti	Rachel	Central Committee of Nevada State Grazing Boards		1158	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Permitted Use- Remove the term from the regulations. The term "preference" should replace the term "Permitted use" everywhere that it is now being used.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	14	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Permitted Use - This term should be removed anywhere it appears within the regulations and should be replaced in each instance with the term grazing preference. Permitted use has no connection to the painstakingly adjudicated grazing preferences and does not enjoy the same protection that an adjudicated grazing preference historically received. A grazing preference could not be canceled, suspended, or reduced without an evidentiary hearing that afforded due process to the permittee. PLC v. US DOI 929 F. Supp. 1436 (1996) at 1441 quoting Oman v. United States, 179 F.2d 738, 742 (10th Circuit 1949). Permitted use is not what TGA created. It is simply a permission from government that can just as easily be reduced or canceled. Again, see the citation listed under Grazing Preference for a more detailed discussion.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Passages taken from 43 CFR 4100 will appear in italicized text. Our recommendations will appear as underlined text. Recommended deletions will appear as strikethrough text. Bold text is for emphasis only. Comments follow in numerical order from 43 CFR 4100. In order to improve the grazing regulations in 43 CFR 4100, USCA suggests the following changes: [USING "OLD TEXT" FROM 2006 REGULATIONS AND "COMMENTER'S RECOMMENDED NEW TEXT" TO HIGHLIGHT COMMENTER'S RECOMMENDED CHANGES] OLD TEXT: Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. COMMENTER'S RECOMMENDED NEW TEXT: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension, and other authorized forms of use. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	43	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Original text: The objectives of these regulations are to promote healthy sustainable rangeland ecosystems; to promote orderly use, improvement, and development of the public lands; to establish efficient and effective administration of grazing of public rangelands; and to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, healthy public rangelands. These objectives shall be realized in a manner that is consistent with land use plans, multiple use, sustained yeild, environmental values, economic and other objectives stated in 43 CFR part 1720, subpart 1725; the Taylor Grazing Act of June 28, 1934, as amended ((43 U.S.C. 315, 315a-315r); section 102 of the Federal Land Policy Management Act of 1976 (43 U.S.C. 1740). [47 FR 41709, Sept 21, 1982, as amended at 49 FR 6449, Feb. 21, 1984; 49 FR 12704, Mar. 30, 1984] Proposed text: The objectives of these regulations are to enhance healthy sustainable rangeland ecosystems; to improve resource conditions; to promote orderly use and development of public lands; to establish efficient and effective administration of grazing of public rangelands; and to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, healthy public rangelands. These objectives shall be realized in a manner that recognized the requirements of the Taylor Grazing Act and reflects multiple use, sustained yeild, environmental values, economic and other objectives stated in 43 CFR part 1720, subpart 1725; the Taylor Grazing Act of June 28, 1934, as amended ((43 U.S.C. 315, 315a-315r); section 102 of the Federal Land Policy Management Act of 1976 (43 U.S.C. 1740) and the Public Rangeland Improvement Act of 1978 (PRIA) (Pub.L. 95-514).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	45	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Original Text: [43 FR 29067, July 5, 1978, as amended at 49 FR 6449, Feb. 21, 1984; 49 FR 12704, Mar. 30, 1984; 50 FR 45827, Nov. 4, 1985] Proposed Text: delete original text

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mayer	Christopher		NV	823	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Operational Flexibility include as a definition and add to Subpart 4130 Authorizing Grazing UseAdaptive use will emphasize flexibility to adjust to differences in perennial and annual forage availability and growing conditions and other factors such as livestock health and management, animal distribution, and animal dietary requirements. Information based range management will be applied associated with grazing use. Adaptive use will be driven in part by this annual information. Adaptive use includes flexibility in livestock numbers, active use AUMs and periods of use. Adaptive use must also consider the many factors associated with stocking levels and herd size including the timing and movement of livestock within the overall combined operation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	11	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT: Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans." Carrying capacity: The phrase "carrying capacity" should be changed to "Domestic livestock carrying capacity" and be defined as: Domestic livestock carrying capacity is a quantifiable number of Animal Unit Months as determined by rangeland studies on a sustainable yield basis that will not induce damage to vegetation or related resources. Domestic livestock carrying capacity should refer to only the forage appropriated to livestock not total forage availability. Distinction must be made between livestock forage and forage appropriated to wildlife, wild horses and burros, and other conservation purposes in order to comply with the Bureau's multiple-use mandate. This will allow BLM to better determine the causal factors of adverse range conditions. Conservation use: Conservation use should be removed from the regulations to comply with the opinion of the U.S. District Court for the District of Wyoming (Public Lands Council v. Babbitt, 929 F. Supp. 1436 (D. Wyo. 1996), and upheld by the Tenth Circuit Court of Appeals (Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir. 1999), which found that the term supersedes the BLM's authorities under the Taylor Grazing Act. Consultation, cooperation, and coordination: The definition should be returned to BLM's pre-1995 grazing regulations to maintain consistency with the language in the Federal Land Policy and Management Act (FLPMA). Monitoring: the regulations should specify "quantitative data" so that the definition reads: "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. We support requiring monitoring to identify ecological site and current ecological site potential, as shown by state and transition modeling, when assessing effects of management actions and effectiveness of management actions in reaching objectives. BLM should base grazing decisions that have economic and practical implications to permittees on quantitative data, not "best guesses" or anecdotal observations. BLM should base actions on replicable, high-quality scientific data and include cooperatively collected quantitative data. Utilization: Refine the definition of "utilization" to read as follows: OLD TEXT [2006 GRAZING REGS] Utilization means the portion of

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	11	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Consultation, cooperation, and coordination means interaction for the purpose of obtaining advice, or exchanging opinions on issues, plans, or management actions. NEW TEXT Consultation, cooperation, and coordination means RATIONALE "If the Secretary concerned elects to develop an allotment management plan for a given area, he shall do so in careful and considered consultation, cooperation and coordination with the lessees, permittees, and landowners involved, the district grazing advisory boards established pursuant to section 403 of the Federal Land Policy and Management Act (43 U.S.C. 1753), and any State or States having lands within the area to be covered by such allotment management plan." (PUBLIC LAW 95-514, Sec. 8)While the above quote is related directly to allotment management plans, it demonstrates that consultation, cooperation, and coordination is specific for parties with direct involvement in the issue and have a vested interest. These terms imply that those being consulted, cooperating, and coordinating having more than an opinion, but have some expertise, investment, rights, privilege or jurisdiction and will have a mutual benefit from participation. It is much more than an interaction, advice or opinion. Please redefine. Definitions from Black's Law Dictionary, 5th edition 1979 Consultation. "Act of consulting or conferring; e.g. patient with doctor; client with lawyer. Deliberation of persons on some subject. Cooperation. Action of co-operating. Association of persons for common benefit. In patent law, unity of action to a common end or a common result, not merely joint or simultaneous action. Coordinate. Equal, of the same order, rank, degree or importance; not subordinate. Only by working together to develop objectives that have a realistic expectation to improved rangeland conditions through grazing management will there be a dedication of both the livestock producer and the agency. Control means being responsible for and providing care and management of base property and/or livestock. This is the second definition of "control"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	16	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Conservation use means an activity, excluding livestock grazing, on all or a portion of an allotment for purposes of- (1) Protecting the land and its resources from destruction or unnecessary injury; (2) Improving rangeland conditions; or (3) Enhancing resource values, uses, or functions. NEW TEXT _____. RATIONALE Comment [AS5]: The definition and usage of "Conservation use" should be deleted throughout Part 4100 since the term was found by the Federal Courts to have violated applicable law. See Public Lands Council v. Babbitt, 529 U.S. 728, 747, 120 S.Ct. 1815, 146 L.Ed. 2d 753 (2000) (wherein the U.S. Supreme Court stated that "New regulations allowing issuance of permits for conservation use were held unlawful by the Court of Appeals, see 167 F.3d, at 13071308, and the Secretary did not seek review of that decision.")
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Allotment means an area of land des-ignated and managed for grazing of livestock. NEW TEXT Allotment means an area of federal land designated and managed with a permittee(s) or lessee(s) having exclusive use for grazing of livestock.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	26	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Objectives. Section 4100.0-2 should better reflect FLPMA's sustainability mandate, other relevant environmental statutes, and our current scientific understanding of ecosystem management. The revised regulations therefore should include an objective to provide for the sustainability of natural ecosystems and land and water resources and assure over the long term that the productivity of the land and the quality of the environment are not impaired. In addition, this section should reference the Endangered Species Act of 1973, as amended (16 U.S.C. Chapter 35); the Clean Water Act of 1970, as amended (33 U.S.C. §1251 et seq.); and the National Environmental Policy Act of 1970 (42 U.S.C. Chapter 55) in addition to the Taylor Grazing Act and the Federal Land Policy and Management Act (FLPMA). These three acts are directly relevant to the management of our public rangelands and achievement of the rangeland health standards in Section 4180.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Monitoring: the regulations should specify "quantitative data" so that the definition reads: "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives." We support requiring monitoring to identify ecological site and current ecological site potential, as shown by state and transition modeling, when assessing effects of management actions and effectiveness of management actions in reaching objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Dearing Ranch		1311	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Monitoring: the regulations should specify "quantitative data" so that the definition reads: "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. We support requiring monitoring to identify ecological site and current ecological site potential, as shown by state and transition modeling, when assessing effects of management actions and effectiveness of management actions in reaching objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Monitoring: the regulations should specify "quantitative data" so that the definition reads: "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. We support requiring monitoring to identify ecological site and current ecological site potential, as shown by state and transition modeling, when assessing effects of management actions and effectiveness of management actions in reaching objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	19	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Monitoring: the regulations should specify "quantitative data" so that the definition reads: "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. We support requiring monitoring to identify ecological site and current ecological site potential, as shown by state and transition modeling, when assessing effects of management actions and effectiveness of management actions in reaching objectives.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Monitoring: the regulations should specify "quantitative data" so that the definition reads: "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. We support requiring monitoring to identify ecological site and current ecological site potential, as shown by state and transition modeling, when assessing effects of management actions and effectiveness of management actions in reaching objectives. BLM should base grazing decisions that have economic and practical implications to permittees on quantitative data, not "best guesses" or anecdotal observations. BLM should base actions on replicable, high-quality scientific data and include cooperatively collected quantitative data. Utilization: Refine the definition of "utilization" to read as follows: "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season or end of the annual grazing season, whichever comes later. Utilization may refer either to a single species or to the vegetation as a whole." The definition should remove the phrases "specific period" "pattern of use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	ortega	adam	Colorado Department of Agriculture	CO	981	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Monitoring means the periodic observation and orderly collection of data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. CDA suggests modifying the definition to include collection of quantitative data to evaluate. Site specific quantitative monitoring is the best available science that should influence proposed changes to livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	25	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Monitoring is vital to the success of BLM's land management actions. Without the benchmark provided by baseline resource and scientific data, habitat and ecosystems suffer a continual erosion. As such, any definition of this term in revised regulations should recognize the importance of, and require collection of, measurable, repeatable, quantitative information.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Monitoring The definition should be revised to state: "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. Monitoring shall consider the ecological site and the current ecological site potential, based on state and transition modeling applied in the current rangeland science applications, in assessing the effects of management actions and the effectiveness of actions in meeting management objectives."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Monitoring The definition should be revised to state: "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. Monitoring shall consider the ecological site and the current ecological site potential, based on state and transition modeling applied in the current rangeland science applications, in assessing the effects of management actions and the effectiveness of actions in meeting management objectives."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Livestock Carrying Capacity This definition should read: "Domestic livestock carrying capacity is synonymous with stocking rate and means a quantifiable number of Animal Unit Months as determined by rangeland studies designed to determine and quantify a stocking rate on a sustained yield basis upon a given area of public lands without inducing damage to vegetation or related resources."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	28	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Land use plans. Section 4100.0-8 explains the function of land use plans and that grazing must be managed consistent with the direction of those plans. As written, however, the regulation does not describe the role of land use plans in allocating lands available for grazing. We therefore recommend that a sentence be added to this section that clarifies that land use plans identify lands available for grazing considering a number of factors such as other uses of the land; terrain characteristics; soil, vegetation, and watershed characteristics; the presence of other resources that may require special management or protection; designated critical habitat for a species protected under the Endangered Species Act; and land designations (e.g., a unit of the National Landscape Conservation System, an Area of Critical Environmental Concern; a special recreation management areas). This language echoes language currently in BLM Handbook 1601-1, Appendix C.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	13	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Interested public: In the current definition, please remove "involved in the decision making process". The WSGB also recommends that the definition of the term "interested public" be redefined in the revised Grazing Regulations as, " an individual, group or organization that has submitted in writing to the AO a request to provide comments to the AO on the management of livestock grazing on specific allotments, and who has been determined by the AO to be an "interested public", and has the right to provide comments on BLM grazing activities."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Buzzetti	Rachel	Central Committee of Nevada State Grazing Boards		1158	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Interested public- The definition of "interested public" should not be written in a way that permits every member of the public to appeal every action implementing an allotment management plan or other grazing management prescriptions and should be limited to a person who has requested in writing to the AO, to be an interested publici on one or more allotments and who have provided comments on the adoption or renewal of an allptment management plan. We recommend revising the definition as follows: "Interested public means an individual) group or organization that has submitted written comments to the ELM raising specific concern} during the public comment period regarding the adoption or renewal of an allotment management plan or other grazing management prescriptions, and has requested in writing to the AO to be an interested public on one or more allotments. "
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Interested Public While we recognize the importance of continued to allow adequate opportunity for public input, the definition of interested public should not be written in a way that allows every member of the public to appeal every action implementing an allotment management plan or other grazing management prescriptions. The definition of "interested public" should distinguish between a member of the general public, who does not directly interact with the administrative action in question, and those who qualify as an "affected interest".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	12	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Interested public - An interested public should be defined to only include those individuals who have actual knowledge of the specific grazing allotment through one or more recent personal visits to the allotment and who has a vested interest in the results of its ongoing management beyond simply asserting an interest. An interested public should be required to commit to collaborative resolution of any issues or concerns raised prior to entering any litigation. The interested public must understand the purposes and intent of TGA, FLPMA and PRIA and work toward achieving those objectives through constructive suggestions rather than blanket criticisms.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Include New Definition for "Affected Interest" - "Affected Interest" means an individual or organization in possession of a Preference grazing right as defined in 43CFR § 4100, or its equivalent."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	14	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	In the current definition of "monitoring", please add the word "quantitative" in front of the phrase "data to evaluate". The WSGB supports the retention of items (1) and (2) as now written.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	12	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	In the current definition of "Grazing permits", please remove the term "conservation use" and add at this location, " and the terms and conditions including the flexibility on issues decided by joint agreement between the local BLM and the permittee".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	In the current definition of " Cancelled or cancellation", please remove the phrase "and grazing preference" from this definition. It is the opinion of the WSGB, that, only congress, the Secretary of Interior, or someone in his/her office appointed by the president as per language at Section 204 of the FLPMA, are the only government employees that have the authority to "cancel" all or part of the preference level of Section 3 AUMs or the priority position, of the legally adjudicated AUM's attached to qualified base property, and even he/she would need to go thru the process described in the FLPMA to accomplish this task.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354		Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	<p>Grazing preference and preference: Restore pre-1995 definitions including a priority position for renewal of a grazing permit. Permits should recognize and restore AUMs levels reduced solely as a result of application of the 1995 change in definition. This does not suggest that AUM changes made as a result of monitoring or other range conditions should not be changed without proper analysis. Suggested language: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension, and other authorized forms of use. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans." Carrying capacity: The phrase "carrying capacity" should be changed to "Domestic livestock carrying capacity" and be defined as: Domestic livestock carrying capacity is a quantifiable number of Animal Unit Months as determined by rangeland studies on a sustainable yield basis that will not induce damage to vegetation or related resources. Domestic livestock carrying capacity should refer to only the forage appropriated to livestock not total forage availability. Distinction must be made between livestock forage and forage appropriated to wildlife, wild horses and burros, and other conservation purposes in order to comply with the Bureau's multiple-use mandate. This will allow BLM to better determine the causal factors of adverse range conditions. Conservation use: Conservation use should be removed from the regulations to comply with the opinion of the U.S. District Court for the District of Wyoming (Public Lands Council v. Babbitt, 929 F. Supp. 1436 (D. Wyo. 1996), and upheld by the Tenth Circuit Court of Appeals (Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir. 1999), which found that the term supersedes the BLM's authorities under the Taylor Grazing Act. Consultation, cooperation, and coordination: The definition should be returned to BLM's pre-1995 grazing regulations to maintain consistency with the language in the Federal Land Policy and Management Act (FLPMA). Monitoring: the regulations should specify "quantitative data" so that the definition reads: OLD TEXT "Monitoring means the periodic observation and orderly collection of data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. NEW TEXT "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. We support requiring</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Lone Tree Cattle Company	CA	1344	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Grazing preference and preference: Restore pre-1995 definitions including a priority position for renewal of a grazing permit. Permits should recognize and restore AUMs levels reduced solely as a result of application of the 1995 change in definition. This does not suggest that AUM changes made as a result of monitoring or other range conditions should not be changed without proper analysis. Suggested language: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension, and other authorized forms of use. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans." Carrying capacity: The phrase "carrying capacity" should be changed to "Domestic livestock carrying capacity" and be defined as: Domestic livestock carrying capacity is a quantifiable number of Animal Unit Months as determined by rangeland studies on a sustainable yield basis that will not induce damage to vegetation or related resources. Domestic livestock carrying capacity should refer to only the forage appropriated to livestock not total forage availability. Distinction must be made between livestock forage and forage appropriated to wildlife, wild horses and burros, and other conservation purposes in order to comply with the Bureau's multiple-use mandate. This will allow BLM to better determine the causal factors of adverse range conditions. Conservation use: Conservation use should be removed from the regulations to comply with the opinion of the U.S. District Court for the District of Wyoming (Public Lands Council v. Babbitt, 929 F. Supp. 1436 (D. Wyo. 1996), and upheld by the Tenth Circuit Court of Appeals (Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir. 1999), which found that the term supersedes the BLM's authorities under the Taylor Grazing Act. Consultation, cooperation, and coordination: The definition should be returned to BLM's pre-1995 grazing regulations to maintain consistency with the language in the Federal Land Policy and Management Act (FLPMA). Monitoring: the regulations should specify "quantitative data" so that the definition reads: "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. We support requiring monitoring to identify ecological site and current ecological site potential, as shown by state and transition modeling, when assessing effects of management actions and effectiveness of management actions in reaching objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Grazing preference and preference: Restore pre-1995 definitions including a priority position for renewal of a grazing permit. Permits should recognize and restore AUMs levels reduced solely as a result of application of the 1995 change in definition. This does not suggest that AUM changes made as a result of monitoring or other range conditions should not be changed without proper analysis. Suggested language: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension, and other authorized forms of use. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cunningham	Sean		OR	1231	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Grazing Preference The definition of "grazing preference" should be restored to its pre-1995 version and include a priority position for renewal of a grazing permit. The amended definition should also recognize and restore the level of AUMs that were established for the grazing permit for permits that were decreased solely as a result of application of the 1995 definitional change.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Grazing Preference - The definition of "grazing preference or preference" should be modified to reflect both a priority position for renewal of a grazing permit, as directed in the TGA, and the level of AUMs that were historically established for that permit as reflected in the pre-1995 definition. To be consistent with the TGA, we recommend the definition should be: "Grazing preference or preference means the right of a permittee with recognized base property to have the permit renewed so long as he is in compliance with these rules. Grazing preference also includes the total historic number of animal unit months on federal rangelands as an adjudicated, apportioned appurtenance attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans." For a detailed discussion of the importance of this change, see PLC v. Babbitt, 154 F.3d 1160 (1998) in the dissenting opinion of Judge Tacha at 1182 - 1189. See also PLC v. US DOI, 929 F.Supp. 1436 (1996) at 1441.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Buzzetti	Rachel	Central Committee of Nevada State Grazing Boards		1158	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Grazing Preference - should be revised to include both a priority position for renewal of a grazing permit and the level of AUM's that were established for that permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	ortega	adam	Colorado Department of Agriculture	CO	981	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Grazing Lease means a document authorizing use of the public lands out-side an established grazing district. Grazing leases specify all authorized use including livestock grazing, suspended use, and conservation use. Leases specify the total number of AUMs apportioned, the area authorized for grazing use, or both. In addition to the term Grazing Lease, CDA requests a new term that describes a Base Lease, to differentiate between a BLM Lease and a livestock operators leasing of Base Property which is used to determine grazing preference.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klump	Levi	Hidalgo County Cattle Growers Association	NM	1054	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Grazing "Preference" must refer to whomever owns or controls the base property attached to an allotment. Lending institutions need that assurance.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	16	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Furthermore, this definition is too broad to be of use in grazing regulations and should be replaced with a much more appropriate definition of "rangelands" or "federal rangelands" similar to the definition in PRIA. This definition is "lands administered by the Secretary of the Interior through the Bureau of Land Management in the sixteen contiguous western states on which there is domestic livestock grazing or which the Secretary determines may be suitable for livestock grazing." This definition is much more specific to the lands being regulated by these rules and does not provide the false impression that these lands are "public lands" as otherwise defined in federal law.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	For the purposes of these grazing regulations, the term "domestic livestock carrying capacity" should not be used to refer to the total on-range forage availability. In order to comply with the Bureau's multiple-use mandate, the distinction must be made between the forage made available to domestic livestock and other purposes such as wildlife and federally protected wild horses and burros, where applicable. This will better inform the Bureau in determining whether the causal factors of adverse range conditions due to over-utilization can be attributed to domestic livestock, wildlife, or federally protected wild horses and burros.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	16	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Domestic livestock carrying capacity should refer to only the forage appropriated to livestock not total forage availability. Distinction must be made between livestock forage and forage appropriated to wildlife, wild horses and burros, and other conservation purposes in order to comply with the Bureau's multiple-use mandate. This will allow BLM to better determine the causal factors of adverse range conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Domestic livestock carrying capacity should refer to only the forage appropriated to livestock not total forage availability. Distinction must be made between livestock forage and forage appropriated to wildlife, wild horses and burros, and other conservation purposes in order to comply with the Bureau's multiple-use mandate. This will allow BLM to better determine the causal factors of adverse range conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Delete "Permitted use" from the definitions. The term "Grazing preference" should replace the term "Permitted use" wherever it is used in the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Delete "Conservation use" from the definitions and throughout the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Adams	Chase	American Sheep Industry Assn	CO	1031	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Definitions, 43 CFR §4100.0-5, we believe that "grazing preference or preference" should be restored to its pre-1995 version. ASI policy calls for the "first preference for permits and leases to present permittees rather than entities that have no land- or water-base property or year-round operations." We believe the definition of preference should be: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension, and other uses as authorized under these regulations and provided in agency guidance and policy. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cozzens	Paul	Iron County Commission	UT	1492	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Definition: Consultation, Cooperation, and Coordination (CCC) -Change current definition to the pre 1996 regulations which indicates CCC with those that have a vested interest in the allotment. Definition: Affected Interest. Affected Interest should be an individual or organization who holds a preference grazing right as defined by 43 CFT 4100. Definition of Interested Public: The current guidelines seems to encourage any member of the public to appeal an action of implementing a grazing allotment management plan without prior involvement of knowledge of the grazing allotment. Suggest limiting to persons who have requested in writing to the authorized officer, to be an interested public on one or more allotments and who have provided comments on the adoption or renewal of the allotment management plan . Definition of Monitoring: Current definition is too vague and allows subjective decisions to be made. The definition should indicate that monitoring should be based on evaluation of quantitative data and measured at the end of the growing season, vs various times of the year.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schickedanz	Jerry			1244	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Definition of "Valid Existing Rights". PL 94-579 Sec 701(a) Nothing in this Act, or in any amendment made by this Act, shall be construed as terminating any valid lease, permit, patent, right-of-way, or other land use right or authorization existing on the date of approval of this act. PL 94-579 Sec 701(h) All actions by the Secretary concerned under this act shall be subject to valid existing rights. Valid existing rights are not clearly defined as to meaning and purpose as applied to Permit renewal, allotment management plan, annual plan of operation etc. Clarification of this term will alleviate many problems and ligation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Scarbrough	Gary	Otero County Public Land Use Advisory Council	NM	1202	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Define Outcome Based Grazing. The land is not owned by the 'public', but is held in trust and managed for multiple use on behalf of the public. The public in general is not affected and does not have a vested/economic interest, nor does it have right, title, or interest as defined by the Taylor Grazing Act of 1934 (TGA). Therefore, 'interested public' should be taken out of the equation. This would streamline the process while meeting NEPA and legal requirements.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Define Outcome Based Grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	18	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Consultation, cooperation, and coordination: The definition should be returned to BLM's pre-1995 grazing regulations to maintain consistency with the language in the Federal Land Policy and Management Act (FLPMA).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Dearing Ranch		1311	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Consultation, cooperation, and coordination: The definition should be returned to BLM's pre-1995 grazing regulations to maintain consistency with the language in the Federal Land Policy and Management Act (FLPMA).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Consultation, cooperation, and coordination: The definition should be returned to BLM's pre-1995 grazing regulations to maintain consistency with the language in the Federal Land Policy and Management Act (FLPMA).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Consultation, cooperation, and coordination: The definition should be returned to BLM's pre-1995 grazing regulations to maintain consistency with the language in the Federal Land Policy and Management Act (FLPMA).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Consultation, cooperation, and coordination: The definition should be returned to BLM's pre-1995 grazing regulations to maintain consistency with the language in the Federal Land Policy and Management Act (FLPMA).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Consultation, cooperation, and coordination, (CCC) - this definition should be modified to ensure anti-grazing individuals and groups are not involved in the routine processes of grazing permit renewal and grazing management actions and practices that are already governed by applicable statutes and land-use plans. Their role should be limited to broad-scale strategies as determined and reflected in land use plans where they have ample opportunities to be involved in the process. The definition of CCC should be: meaningful interaction prior to decision-making (not simply informative after decisions have been made) for the purpose of obtaining knowledge and advice, discovering and applying scientific and economic information and exchanging opinions with the object of seeking agreement on management issues arising under land use plans. Including as appropriate other agencies and affected permittees or lessees, landowners, district grazing advisory boards where established and any State having lands within the area to be covered by an allotment management plan.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Consultation, cooperation, and coordination This definition should be revised to facilitate better communication with permittees. It has been our recent experience that local BLM staff do not have adequate ability to coordinate with affected stakeholders and other interested parties, including state and local governments, to find resolution to issues of concern. This could be resolved if the definition provided an opportunity for the review of monitoring and other reports that are used as a basis for making decisions, prior to those decisions being made.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334		6 Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Conservation use: The current definition excludes the inclusion of livestock grazing as a tool or process that can provide conservation benefits. Grazing residual vegetation can reduce its biomass; thus, fuel loads and change fuel continuity. This fits item 1 of the conservation use definition. Fall and winter use of sagebrush rangelands by sheep and cattle have been shown to increase perennial herbaceous species in the understory and benefit range condition (Laycock 1967). This meets bullet 2, improving rangeland conditions. Research has shown that grazing at specific times and/or amounts can benefit perennial grasses for elk and enhance elk management (Severson and Urness 1994, Crane et al. 2016). This would satisfy bullet 2: enhancing resource values, uses or functions. Livestock grazing needs to be recognized as a conservation use for many management situations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	17	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Conservation use: Conservation use should be removed from the regulations to comply with the opinion of the U.S. District Court for the District of Wyoming (Public Lands Council v. Babbitt, 929 F. Supp. 1436 (D. Wyo. 1996), and upheld by the Tenth Circuit Court of Appeals (Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir. 1999), which found that the term supersedes the BLM's authorities under the Taylor Grazing Act.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Dearing Ranch		1311	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Conservation use: Conservation use should be removed from the regulations to comply with the opinion of the U.S. District Court for the District of Wyoming (Public Lands Council v. Babbitt, 929 F. Supp. 1436 (D. Wyo. 1996), and upheld by the Tenth Circuit Court of Appeals (Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir. 1999), which found that the term supersedes the BLM's authorities under the Taylor Grazing Act.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Conservation use: Conservation use should be removed from the regulations to comply with the opinion of the U.S. District Court for the District of Wyoming (Public Lands Council v. Babbitt, 929 F. Supp. 1436 (D. Wyo. 1996), and upheld by the Tenth Circuit Court of Appeals (Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir. 1999), which found that the term supersedes the BLM's authorities under the Taylor Grazing Act.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Conservation use: Conservation use should be removed from the regulations to comply with the opinion of the U.S. District Court for the District of Wyoming (Public Lands Council v. Babbitt, 929 F. Supp. 1436 (D. Wyo. 1996), and upheld by the Tenth Circuit Court of Appeals (Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir. 1999), which found that the term supersedes the BLM's authorities under the Taylor Grazing Act.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Conservation use: Conservation use should be removed from the regulations to comply with the opinion of the U.S. District Court for the District of Wyoming (Public Lands Council v. Babbitt, 929 F. Supp. 1436 (D. Wyo. 1996), and upheld by the Tenth Circuit Court of Appeals (Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir. 1999), which found that the term supersedes the BLM's authorities under the Taylor Grazing Act.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Conservation Use This term should be deleted from the grazing regulations
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Buzzetti	Rachel	Central Committee of Nevada State Grazing Boards		1158	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Conservation use - Remove the term from the regulations
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baumann	Jim	Nevada State Grazing Board District N-6	NV	986	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Changing "permittee" to "preference holder" would return to the intent of the Taylor Grazing Act and true grazing preference.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	ortega	adam	Colorado Department of Agriculture	CO	981	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	CDA requests the addition of "quantitative" as it relates to monitoring throughout the grazing regulations. In relation to monitoring, a definition of "Field Observations" would remove the ambiguity of what qualifies as an observation. Observations are subject to the observers perspectives and do not translate to an authorized officers decision making process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	CCA and CO PLC propose the following updated definition of "Affected Interest": "Affected Interest" means an individual or organization in possession of a Preference grazing right as defined in 43CFR § 4100, or its equivalent."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Carrying capacity: The phrase "carrying capacity" should be changed to "Domestic livestock carrying capacity" and be defined as: Domestic livestock carrying capacity is a quantifiable number of Animal Unit Months as determined by rangeland studies on a sustainable yield basis that will not induce damage to vegetation or related resources.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Carrying capacity: The phrase "carrying capacity" should be changed to "Domestic livestock carrying capacity" and be defined as: Domestic livestock carrying capacity is a quantifiable number of Animal Unit Months as determined by rangeland studies on a sustainable yield basis that will not induce damage to vegetation or related resources. Domestic livestock carrying capacity should refer to only the forage appropriated to livestock not total forage availability. Distinction must be made between livestock forage and forage appropriated to wildlife, wild horses and burros, and other conservation purposes in order to comply with the Bureau's multiple-use mandate. This will allow BLM to better determine the causal factors of adverse range conditions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	21	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	BLM should base grazing decisions that have economic and practical implications to permittees on quantitative data, not "best guesses" or anecdotal observations. BLM should base actions on replicable, high-quality scientific data and include cooperatively collected quantitative data. Utilization: Refine the definition of "utilization" to read as follows: "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season or end of the annual grazing season, whichever comes later. Utilization may refer either to a single species or to the vegetation as a whole." The definition should remove the phrases "specific period" "pattern of use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Dearing Ranch		1311	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	BLM should base grazing decisions that have economic and practical implications to permittees on quantitative data, not "best guesses" or anecdotal observations. BLM should base actions on replicable, high-quality scientific data and include cooperatively collected quantitative data. Utilization: Refine the definition of "utilization" to read as follows: "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season or end of the annual grazing season, whichever comes later. Utilization may refer either to a single species or to the vegetation as a whole." The definition should remove the phrases "specific period" "pattern of use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	BLM should base grazing decisions that have economic and practical implications to permittees on quantitative data, not "best guesses" or anecdotal observations. BLM should base actions on replicable, high-quality scientific data and include cooperatively collected quantitative data. Utilization: Refine the definition of "utilization" to read as follows: "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season or end of the annual grazing season, whichever comes later. Utilization may refer either to a single species or to the vegetation as a whole." The definition should remove the phrases "specific period" "pattern of use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	BLM should base grazing decisions that have economic and practical implications to permittees on quantitative data, not "best guesses" or anecdotal observations. BLM should base actions on replicable, high-quality scientific data and include cooperatively collected quantitative data. Utilization: Refine the definition of "utilization" to read as follows: "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season or end of the annual grazing season, whichever comes later. Utilization may refer either to a single species or to the vegetation as a whole." The definition should remove the phrases "specific period" "pattern of use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	25	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Bison are currently not included in the definition of livestock at 43 CFR §4100.0-5. Domestic bison grazing is a growing industry.[11: According to 2017 Census of Agriculture (page 474), the bison population on American ranches and farms now stands at 183,780, which is a 13.3 percent increase since the 2012 census.] Compared to cattle and sheep grazing, bison grazing is considered to be "kinder" on the land, in particular in ecosystems where native bison naturally occurred; bison and the native plants and watersheds evolved in concert such that bison grazing style and timing is more compatible with conserving native ecosystems (Grudinski et al 2018; Khol et al 2013; Allred et al 2011). The revised regulations should therefore revise the definition of livestock to include privately-owned bison.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallwood	Lori	Big Horn County Commissioners	WY	1223	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Big Horn County asks that the agency revise the regulations recognize the importance of grazing preference in the use and renewal of grazing permits. BLM should redefine "preference" or "grazing preference" to include both a priority position for renewal of a grazing permit and the level of AUMs that were established for that permit. Grazing preference ensures that, as conditions allow, permit holders may graze at historically permitted levels and are recognized for long-term grazing when applying for renewals. This will ensure that grazing on public lands continues into the future.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Base property: Please remove item (1) in the current Regulations that now says, " Land that has the capability to produce crops or forage that can be used to support authorized livestock for a specified portion of the year". Our justification for this recommendation is that item (1) is an archaic concept related to "commensurability" that is no longer supported by either the BLM or the WSGB. BLM, to our knowledge, does not do what item (1) requires them by Regulation to actually do when the BLM assesses whether or not base property offered by an applicant is adequate.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	19	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	At the location of the last sentence at Sec. 4100.0-8, the WSGB recommends a change from the language that now says, "... the AO shall be in conformance with the LUP as defined at 43 CFR 1601.0-5 (b) because the BLM's Planning Regulations at 43 CFR 1601.0-5 9 b) are in conflict with the Secretary of interior's policy to promote adaptive management and restricts the use of the flexibility policy of the BLM.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	18	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	At 4100.0-7 Cross Reference, the WSGB recommends removal in the second sentence that Land use Plans, LUP's, shall "establish" allowable resource uses. We recommend this sentence say, " Land Use Plans shall provide guidelines for allowable resource uses ... ", because a Regulation that says that LUP's shall "establish" allowable resources is contrary to the use of the concept of adaptive management by the State and local BLM offices and diminishes the influence of State and local County governments during the preparation of LUP's.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Animal unit month: There needs to be a standard size unit to define a cow and her calf. A cow may be 1,000 pounds or 1,300. The amount of feed consumed is largely a function of size; thus, two 500 head cow herds, one with 1,000-pound cows on average, and one with an average of 1,300-pound cows, do not both have 500 animal unit months, with respect to forage consumption.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Animal Unit Month (AUM) - this definition should be slightly modified to conform with the definition that has historically been used throughout the livestock industry. An animal unit month is the amount of forage necessary for the sustenance of one cow and its calf, or their equivalent for a period of one month. See https://www.nrcs.usda.gov/Internet/FSE_DOCUMENTS/nrcs144p2_054048.pdf
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Denice	Lincoln County, NV		1177	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	All decisions must be science based - not political. "Conservation Use" is an oxymoron that is purely political. The concept of "Conservation Use" needs to be eliminated from the regulations.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Buzzetti	Rachel	Central Committee of Nevada State Grazing Boards		1158		4 Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Afected Interest- The Pre Babbitt definition of "affected interest" reads: "Affected Interest means an individual or organization that has expressed in writing to the authorized officer, (AO), concern for the management of livestock grazing on specific grazing allotments and has been determined by the AO to be an affected interest." The Central Connnittee proposes the following updated definition of "Affected Interest": "Affected Interest" means an individual or organization in possession of a Preference grazing right as defined in 43CFR § 4100 or its equivalent.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schickedanz	Jerry			1244		4 Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Affected Interest. Limited to individuals or organizations that have an active resource interest in a specific grazing allotment, such as: permittee, landowner, state land trust officer, state game and fish, grazing advisory board whom have been approved by the BLM Authorized Officer. Background: Concern that outside groups with "no skin in the game" have too much involvement in individual grazing allotments. The grazing allotment is a financial investment and maybe the only source of income for a family and should not have to operate at the mercy of a grandmother in Florida who have limited knowledge of western conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keck	John E.			1482		4 Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Affected Interest must be defined and limited to parties of active resource interests namely the permittee, the landowner without temporary nonuse violations, state land trust officers, state game and fish officials, and grazing advisory board members who have been approved by the Secretary.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Affected Interest -a permittee or lessee who would be directly affected economically or materially by the proposed action; or those permittees of leases directly adjacent to said action. Affected interest will be directly notified of and provided the opportunity to be involved in the entirety of the proposed action process including, but not limited to, the public comment period. Allotment Management Plan - means a documented program developed in consultation with the permittee(s) as an activity plan... Base Property - land owned or controlled by the applicant for a grazing permit that serves as a base of their livestock operations. Conservation use - delete from the definitions and throughout the grazing regulations. Consultation, Cooperation, and Coordination - a proactive and interactive process for seeking advice, agreement, or interchange of opinions on issues, plans, or management actions from other agencies and permittees or lessees, landowners, the district grazing advisory boards where established, any state having lands within the area to be covered by an allotment management plan and other affected interests. The Consultation process should start before the formal National Environmental Policy Act (NEPA) or renewal process begins. Affected Interests should be contact and notified of the proposal during this Consultation stage. Grazing Preference - the total number of animal unit months apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant. Grazing preference includes active use and use held in suspension. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. Interested Public - a citizen; or United States based group or organization; that has submitted written comments to the BLM raising specific concerns during the public comment period. These comments should carry less weight than Affected Interests. Monitoring - the periodic observation and orderly collection of quantitative data to evaluate... Permitted Use - Grazing Preference should replace the term Permitted Use wherever it is used in the grazing regulations. Utilization - the proportion of current year's forage production that is consumed by grazing animals measured at the end of the annual growing season. May refer either to a single species or the sites vegetative composition.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Affected citizen: A person who has offered to a BLM Authorized Officer, AO, and documentation that they are a citizen of the United States and who has been determined by the AO as a U.S.Citizen and who would be directly affected economically and/or materially by a proposed action from the BLM.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gammett	Glenda		OR	1382	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	43 C.F.R. § 4100.0-5 Definitions. "Grazing Preference" - The definition of "grazing preference or preference" should be restored to its definition prior to the current grazing regs and include both a priority for renewal of a grazing permit and the level of AUMs that were established for that permit. Based on the prior regulations this definition should be: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans." (Note here that "Preference" should also be added to Section 4130.2 - addressing grazing permits or leases) "Meeting Land Health Standards" - For BLM Grazing Regs, this phrase is defined as the Authorized Officer has determined from quantitative monitoring that the Federal lands being grazed by the applicant for renewal of a grazing permit/lease to assess if a positive or stable trend is there to accomplish the allotment objectives in the Land Use Plan or AMP. Permit renewals meeting this shall be issued under a categorical exclusion under the NEPA as authorized under Section 3023 of Public Law 113-291 'An AMP or functional equivalent is an activity plan developed by another agency or permittee that describes grazing management and is approved by the authorized officer, or a plan developed by the BLM for other activities that also includes grazing prescriptions.'" "Permitted use" - Remove this term from the regs and replace it with "preference". Preference is our right and was recognized by the Supreme Court when PLC challenged the regs. "Conservation Use" This term should be taken out of the regs. (conservation is in the eye if the beholder and can be different with each specific instance. Grazing could be determined conservation in the right plan) "Consultation, cooperation, coordination" This should return to the pre 1994 language to be consistent with FLPMA. "Consultation, cooperation and coordination means an interactive process for seeking advice, agreement, or interchange of opinions on issues, plans, or management activities from other agencies and effected permittees or lessees, landowners involved, the district grazing advisory boards where established, and any state having lands within the area to be covered by an allotment management plan and other affected interests." "Affected Interest" -- Pre-Babbitt definition of "affected interest" reads: "Affected Interest" means an individual or organization that has expressed in writing to the authorized officer, (AO), concern for the management
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	43 C.F.R. § 4100.0-5 Definitions. "Grazing Preference" - The definition of "grazing preference or preference" should be restored to its prior version and include both a priority position for renewal of a grazing permit and the level of AUMs that were established for that permit. Based on the prior regulations, the definition should be: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans." (Note - also add "Preference" to Section 4130.2 - Grazing permits or leases).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	43 C.F.R. § 4100.0-5 Definitions. Grazing preference and preference: Restore pre-1995 definitions including a priority position for renewal of a grazing permit. Permits should recognize and restore AUMs levels reduced solely as a result of application of the 1995 change in definition. This does not suggest that AUM changes made as a result of monitoring or other range conditions should not be changed without proper analysis. Suggested language: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension, and other authorized forms of use. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	43 C.F.R. § 4100.0-5 Definitions. The definition of "grazing preference or preference" should be restored to its pre-1995 version and include a priority position for renewal of a grazing permit. The amended definition should also recognize and restore the level of AUMs that were established for the grazing permit for permits that were decreased solely as a result of application of the 1995 definitional change; AUM changes, including increased AUM apportionments, that were made as a result of monitoring or other range conditions should not be adjusted as a result of the OCA suggested definitional change except through regularly scheduled land planning processes. Based on the prior regulations, the definition should be: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or on applicant for a permit or lease. Grazing preference includes active use and use held in suspension, and other uses as authorized under these regulations and provided in agency guidance and policy. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans. " (Note - also add "Preference" to Section 4130.2 - Grazing permits or leases)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Waite	Anita M.	Big Sandy NRDC	AZ	1437	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	4100.0-5 Interested public. The definition of "interested public" should not be written in a way that permits every member of the public to appeal every action implementing an allotment management plan or other grazing management prescriptions and should be limited to a person who has requested in writing to the AO, to be an interested public on one or more allotments and who have provided comments on the adoption or renewal of an allotment management plan. We recommend revising the definition as follows: "Interested public means an individual, group or organization that has submitted written comments to the BLM raising specific concerns during the public comment period regarding the adoption or renewal of an allotment management plan or other grazing management prescriptions, and has requested in writing to the AO to be an interested public on one or more allotments"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Waite	Anita M.	Big Sandy NRDC	AZ	1437	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	4100.0-5 Affected interest. Should return to the pre-Babbitt definition of "affected interest" which reads: "affected interest" means an individual or organization that has expressed in writing to an authorized officer, (AO), concern for the management of livestock grazing on specific grazing allotments and has been determined by the AO to be an affected interest." We recommend further changes to update to the definition to: "affected interest" means an individual or organization in possession of a Preference grazing right as defined in 43CFR § 4100, or its equivalent"

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	4100.0-2 Objectives The objective to accelerate restoration and improvement of public rangelands to properly functioning condition is worthy. That objective, however, must occur within the existing capability of the site. If the site or management unit/area does not have the capability to function properly because an important ecological attribute, process or mechanism is no longer present, or now occurs at a temporal or spatial scale outside evolved patterns, then the site has crossed a threshold.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	5. Comment- Subpart § 4100.0-2 Definitions It should be kept in mind that the definitions at 43 CFR 4100.0-S have implications throughout the regulations. Accordingly it is important to define terms in a manner that assures consistency when referenced in other sections of 43 CFR 4100 and when being applied in the permit renewal process. Definitions should rely on the language shown below or utilize language that achieves the same outcome. In most cases the source of suggested language is shown at the end of the proposed definition change. A. Revision -Active lise, means the current authorized livestock grazing use. (Adapted (rom Julv 5.1978 regulations) B. Revision -Conservation lise, all references should be removed from the Regulations in accordance with and as direct by Court Decisions. C. Revision -Grazing preference or preference, means the total number of animal unit months of livestock grazing on public lands as an adjudicated apPOLiioned appurtenance attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. (Adapted from the 06 and Julv 5.1978 regulations) D. Revision -Permitted lise, Delete all permitted use references entirely (See Brimmer Decision) E. Revision -Utilization meal/S, the portion of annual forage production that has been consumed by livestock. The term is also used to refer to the pattern of use. (Adapted (imn July 5.1 978 regulations) F. Current versions -Consultation, cooperation, and coordination (CCC) means interaction for the purpose of obtaining advice, or exchanging opinions on issues, plans, or management actions. (From 05 and 06 Versions). G. Revision -Consultation, cooperation, find coordillatioll, (CCC) means meaningful interaction for the purpose of obtaining knowledge and advice, discovering and applying scientific information and exchanging opinions with the object of seeking agreement on management issues and land use plans. Including as appropriate other agencies and affected permittee(s) or lessee(s), land owners involved, district grazing advisory boards where established any State having lands within the area to be covered by an allotment management plan. (Adapted (from July 5, 1978 regulations). H. Revisioll -The OS and 06 version definition and use of CCC relative to the Interested Public including anti-grazing individuals and groups, are so broad and inclusive they invite interference in the process of grazing permit renewal and applicable grazing management actions and practices. I. Revisioll -Illterested public, This definition is essentially the same in both the OS and 06 versions and allows virtually anyone to intervene and demand specific management actions and practices in "a specified grazing allotment".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	2. §4100.0-2 Objectives. Experience has shown that under the 05 Regs virtually no consideration is given to the individual economic effects of management alternatives when preparing EAs for grazing permit renewals. The Objective language need to place more emphasis on the impact assessment and relative consideration given to the cost / benefit relationships for differing management alternatives. Comment-See §4100. 0-2 a b) "These objectives will be consistent with land use plans, multiple use, sustained yield, environmental values, economic and other objectives stated in the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.c. 31S, 31Sa-3ISr); section 102 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1701) and the Public Rangelands Improvement Act of 1978 (43 U.S.C. I 90 I (b)(2))." This objective needs to be reflected throughout the language of the Subpart.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	47	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	<p>§4100.0-8 Land use plans. Original text: The authorized officer shall manage livestock grazing on public lands under the principle of multiple use and sustained yield, and in accordance with applicable land use plans. Land use 43 CFR Ch. 11 (10-1-94 Edition) plans shall establish allowable resource uses (either singly or in combination), related levels of production or use to be maintained, areas of use, and resource condition goals and objectives to be obtained. The plans also set forth program constraints and general management practices needed to achieve management objectives. Livestock grazing activities and management actions approved by the authorized officer shall be in conformance with the land use plan as defined at 43 CFR 1601.0-5(b). Proposed text: The authorized officer shall manage livestock grazing on public lands under the principle of multiple use and sustained yield, and allow adaptive management, and in accordance with applicable land use plans. Land use 43 CFR Ch. 11 (10-1-94 Edition) plans shall establish allowable resource uses (either singly or in combination), related levels of production or use to be maintained, areas of use, and resource condition goals and objectives to be obtained. The plans also set forth program constraints and general management practices needed to achieve management objectives. Livestock grazing activities and management actions approved by the authorized officer shall be in conformance with the land use plan as defined at 43 CFR 1601.0-5(b).</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Meeks	Shari	Sublette County Conservation District	WY	1353	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	<p>§ 4100.0-5 Definitions. SCCD would like to see the BLM take a hard look at the definitions within the grazing regulations. SCCD will highlight a few that need addressed, but this is not an exclusive list. "Conservation use" is a term that SCCD feels should be eliminated from grazing regulations. Properly managed grazing on the landscape could be considered a form of conservation use so the term is not considered necessary. "Monitoring " is a term that can include both quantitative and qualitative data. SCCD believes the BLM should only make permit decisions based on quantitative data. Quantitative data is required for assessing Rangeland Health appropriately and thus informing the Standards and Guidelines determinations. Quantitative data allows the BLM to make defensible decisions regarding grazing permits. SCCD offers the following language to refine the current definition: OLD TEXT: Monitoring means the periodic observation and orderly collection of data to evaluate (1) Evaluate effects of management actions ; (2) Evaluate effectiveness of actions in meeting management objectives; and NEW TEXT: Monitoring means the periodic observation and orderly collection both qualitative and quantitative data to : (1) Evaluate effects of management actions ; (2) Evaluate effectiveness of actions in meeting management objectives; and (3) Assess landscape attributes and their relationship to watershed function and rangeland health. " "Rangeland studies" is currently defined as "any study methods accepted by the authorized officer for collecting data on actual use, utilization, climatic conditions, other special events, and trend to determine if management objectives are being met." SCCD offers the following suggested language to refine the current definition: "Rangeland studies refers to any study method(s) accepted by the authorized officer for collecting data on the actual use, utilization, climatic conditions, other than special events, and long-term trend. Rangeland Studies determine if management objectives are being met and detect major changes on the landscape that can inform needs in management changes." Add a definition for the phrase "Meeting Land Health Standards". This phrase shall mean that the BLM Authorized Officer has determined from quantitative monitoring that the Federal lands being assessed demonstrate acceptable resource conditions and a stable or positive trend (if available) to comply with applicable objectives from the Land Use Plan or the Allotment Management Plan, or their functional equivalent. Rangeland Health Assessments for permit renewal that are found to be "Meeting Land Health Standards" and no management changes are being proposed, shall be issued under a categorical exclusion authorized under Section 3023 of Public Law 113-291 and shall require no additional NEPA processing.</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	§4100.0-5 Definitions - IFBF recommends deleting any reference to conservation use wherever it appears in these rules. We oppose the continuance of conservation use permits as it is inconsistent with the language and intent of both the TGA and PRIA. In addition, as noted in the Federal Register, the 10th Circuit Court of Appeals struck down the BLM's ability to issue conservation use permits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	18	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	§ 4770.2 OLD TEXT Grazing lease means a document authorizing use of the public lands outside an established grazing district. Grazing leases specify all authorized use including livestock grazing, suspended use, and conservation use. Leases specify the total number of AUMs apportioned, the area authorized for grazing use, or both. NEW TEXT Grazing lease means a document authorizing grazing use of the public lands under Section 15 of the Act outside an established grazing district. A Grazing lease specifies Grazing preference and the terms and conditions under which lessees may make grazing use during the term of the lease. RATIONALE See insertions and deletions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	12	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	§ 4100.0-5 Definitions. Whenever used in this part, unless the context otherwise requires, the following definitions apply: The Act means the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.C. 315, 315a-315r). OLD TEXT: Active use means the current authorized use, including livestock grazing and conservation use. Active use may constitute a portion, or all, of permitted use. Active use does not include temporary nonuse or suspended use of forage within all or a portion of an allotment. NEW TEXT: Active use means that portion of the grazing preference that is: (1) Available for current authorized grazing use under a permit or lease based on the carrying capacity in an allotment; and (2) Not in temporary nonuse or in suspension. RATIONALE: Comment [AS3]: "Active use" should be redefined to be consistent with the definition of Grazing Preference in the 1989 Hodel Rules and in the 2016 Bush Rules.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	Tony		ID	1088	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	“Grazing Preference” We strongly feel the definition of grazing preference be returned to the definition in place pre 1995 regulations. We also strongly feel this includes the language that states “grazing preference holders have a superior or priority position for the purpose of receiving a grazing permit or lease.” In addition the number of AUMs granted by that preference should be documented and shown in the Land Use Plans for each and every permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	Tony		ID	1087	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	“Affected Interest” In certain areas the current definition has been used to directly have adverse effects on public land grazing by groups we consider to be special interests driven by agendas, rather than a truly “affected interest”. Language we feel should be included in the revision of this definition must show the difference between comments to the agency from those claiming to be affected interest and those truly affected. With that in mind, we recommends the definition of “affected interest” be clarified to mean “an individual or organization that is in possession of a preference grazing right” as defined in 43CFR 4100.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Oxarango	Rochelle		ID	889	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	* Interested Public The definition of interested public should not be written in a way that allows every member of the public to appeal every action implementing an allotment management plan or other grazing management prescriptions. It should be limited to a person who has requested in writing to be an interested public on that allotment and has provided comments during the public comment period.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Guerry	Michael		ID	1487	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	* Clarify what constitutes a nonwillful, incidental trespass and provide an informal way to correct the situation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	11	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Utilization" - The definition of the term "utilization" should be edited to read as follows: "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season. May refer either to a single species or to the vegetation as a whole." BLM should delete the reference in the current "utilization" definition to a "specific period" and the vague term "pattern of use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	14	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Utilization" - The definition of the term "utilization" should be edited to read as follows: "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season. May refer either to a single species or to the vegetation as a whole." BLM should delete the reference in the current "utilization" definition to a "specific period" and the vague term "pattern of use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	11	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Utilization" - The definition of the term "utilization" should be edited to read as follows: "Utilization means the proportion of current year's forage production that is consumed or destroyed by grazing animals measured at the end of the annual growing season. May refer either to a single species or to the vegetation as a whole." BLM should delete the reference in the current "utilization" definition to a "specific period" and the vague term "pattern of use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Permitted use" - The OCA recommends removing this term from the regulations. The term "preference" should replace the term "permitted use" everywhere "permitted use" is found in the regulations to be consistent with the underlying statutory authority.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Permitted use" - The Livestock Groups recommend removing this term from the regulations. The term "preference" should replace the term "permitted use" everywhere "permitted use" is found in the regulations to be consistent with the underlying statutory authority.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Monitoring" - Edit the definition of "monitoring" by adding the word "quantitative" before "data" so that the definition reads: "Monitoring" means the periodic observation and orderly collection of quantitative data to evaluate..."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Monitoring" - Edit the definition of "monitoring" by adding the word "quantitative" before "data" so that the definition reads: "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	13	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Monitoring" - Edit the definition of "monitoring" by adding the word "quantitative" before "data" so that the definition reads: "Monitoring means the periodic observation and orderly collection of quantitative data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. Monitoring shall consider the ecological site and the current ecological site potential, based on state and transition modeling applied in the current rangeland science applications, in assessing the effects of management actions and the effectiveness of actions in meeting management objectives. It is vital to avoid "best guess" opinions by BLM on grazing decisions that have economic and practical implications to permittees. The BLM should rely on replicable, high-quality scientific data to inform administrative actions, particularly when permittees often are integral in the collection and analysis of quantitative measures on public land resources. OCA recognizes that qualitative data often informs a number of agency actions, but monitoring should be focused on clear, defensible metrics that allow for direct comparison over time.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Meeting Land Health Standards" - For the purpose of the BLM Grazing Regulations, this phrase is defined as, the Authorized Officer has determined from quantitative monitoring that the Federal rangelands being grazed by an applicant for a renewal of a grazing permit/lease that a positive or stable trend is evident to accomplish, allotment objectives as expressed in the Land Use Plan or AMP or a functional equivalent of an AMP. Permit/lease renewals meeting this definition of land health standards shall be issued under a categorical exclusion under the NEPA as authorized under Section 3023 of Public Law 113-291."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kershner	Bryce		OR	1042	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Interested Public": definition of interested public should not be written in any way that would allow every member of the public to appeal every action taken in implementing or renewing an allotment management plan or other grazing management prescriptions. It should be limited to a person who has requested, in writing to the AO, to be an interest public and who have provided comments on the allotment management plan (this is on the front end of land planning, not in the renewal process) "Interested public" means an individual, group or organization that has submitted written comments to the BLM raising specific concerns during the public comment period regarding the adoption or renewal of an allotment management plan or other grazing management prescriptions, and has requested in wring to the AO to be an interested public
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Interested public" - The definition of "interested public" should not be written in a way that permits every member of the public to appeal every action in the implementation of an allotment management plan or other grazing management prescriptions and should be limited to a person who has requested, in writing, to the AO, to be an interested public on one or more allotments and who have provided comments on the adoption or renewal of an allotment management plan. We recommend revising the definition as follows: "Interested public means an individual, group or organization that has submitted written comments to the BLM raising specific concerns during the public comment period regarding the adoption or renewal of an allotment management plan or other grazing management prescriptions, and has requested in writing to the AO to be an interested public on one or more allotments."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	12	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Interested public" - The definition of "interested public" should distinguish between a member of the general public, who does not directly interact with the administrative action in question, and those who qualify as an "affected interest". The definition should not, however, eliminate opportunities for public participation where provided by law. The definition should be written in a way that recognizes the extent of investment in the proposed action and any associated legal or regulatory response (i.e. "Affected Interest"). The OCA seeks to draw inspiration from legal processes in which a court may determine standing for specific actions. Accordingly, this definition should make clear which members of the public may appeal an administrative action. To clarify, these individuals should have requested in writing to the AO to be an "interested public" on one or more allotments and have provided comments on the adoption of an allotment management plan, renewal of a term grazing permit, or other relevant administrative action. We recommend revising the definition as follows: "Interested public means an individual, group or organization that has submitted written comments to the BLM raising specific concerns during the public comment period regarding the adoption or renewal of an allotment management plan or other grazing management prescriptions, and has requested in writing to the AD to be an interested public on one or more allotments." (See also concerns with 43 C.F.R. Part 4160 - Administrative Remedies)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Consultation. cooperation. and coordination" - The definition should be returned to BLM's pre-1994 grazing regulations to maintain consistency with the language in the Federal Land Policy and Management Act (FLPMA). Collectively, these activities require consistent and robust participation by affected permittees or lessees. The regulation should read: "Consultation, cooperation and coordination means an interactive process for seeking advice, agreement, or interchange of opinions an issues, plans, or management actions from other agencies and effected permittees or lessees, landowners involved, the district grazing advisory boards where established, any state having lands within the area to be covered by an allotment management plan and other affected interests."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kershner	Bryce		OR	1042	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Consultation, cooperation, coordination": should return to the pre 1994 language to be consistent with FLPMA. "Consultation, cooperation and coordination means an interactive process for seeking advice, agreement, or An interchange of opinions on issues, plans, or management activities from other agencies and elected permitees or lessees, landowners involved, the district grazing advisory boards where established, and any state having lands within the area to be covered by an allotment management plan and other affected interests." "Affected Interest" means an individual or organization in possession of a Preference grazing right as defined in 43CFR 4100 or its equivalent."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Consultation, cooperation, and coordination" - The definition should be returned to BLM's pre-1994 grazing regulations to maintain consistency with the language in the Federal Land Policy and Management Act (FLPMA). Collectively, these activities require consistent and robust participation by affected permittees or lessees. The regulation should read: "Consultation, cooperation and coordination means an interactive process for seeking advice, agreement, or interchange of opinions on issues, plans, or management actions from other agencies and effected permittees or lessees, landowners involved, the district grazing advisory boards where established, any state having lands within the area to be covered by an allotment management plan and other affected interests."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Consultation, cooperation, and coordination" - The definition should be returned to BLM's pre1994 grazing regulations and is consistent with the language in FLPMA. The regulation should read: "Consultation, cooperation and coordination means an interactive process for seeking advice, agreement, or interchange of opinions on issues, plans, or management actions from other agencies and effected permittees or lessees, landowners involved, the district grazing advisory boards where established, any state having lands within the area to be covered by an allotment management plan and other affected interests."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Conservation use" - The Livestock Groups recommend removing this term from the regulations to maintain consistency with the opinion of the U.S. District Court for the District of Wyoming (Public Lands Council v. Babbitt, 929 F. Supp. 1436 (D. Wyo. 1996), and upheld by the Tenth Circuit Court of Appeals (Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir. 1999), which found that the term supersedes the BLM's authorities under the Taylor Grazing Act.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Conservation use" - Remove the term from the regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Conservation use" - OCA recommends removing this term from the regulations to maintain consistency with the opinion of the U.S. District Court for the District of Wyoming (Public Lands Council v. Babbitt, 929 F. Supp. 1436 (D. Wyo. 1996), and upheld by the Tenth Circuit Court of Appeals (Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir. 1999), which found that the term supersedes the BLM's authorities under the Taylor Grazing Act.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Carrying capacity" - The Livestock Groups recommend that the term be changed to "Domestic livestock carrying capacity" and be defined as follows: Domestic livestock carrying capacity is synonymous with stocking rate and means a quantifiable number of Animal Unit Months as determined by rangeland studies designed to determine and quantify a stocking rate on a sustained yield basis upon a given area of public lands without inducing damage to vegetation or related resources. For the purposes of these grazing regulations, the term "domestic livestock carrying capacity" should not be used to refer to the total on-range forage availability. In order to comply with the Bureau's multiple-use mandate, the distinction must be made between the forage made available to domestic livestock and other purposes such as wildlife and federally protected wild horses and burros, where applicable. This will better inform the Bureau in determining whether the causal factors of adverse range conditions due to over-utilization can be attributed to domestic livestock, wildlife, or federally protected wild horses and burros.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Carrying capacity" - OCA recommends that the term be changed to "Domestic livestock carrying capacity" and be defined as follows: Domestic livestock carrying capacity is synonymous with stocking rate and means a quantifiable number of Animal Unit Months as determined by rangeland studies designed to determine and quantify a stocking rate on a sustained yield basis upon a given area of public lands without inducing damage to vegetation or related resources.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"An AMP functional equivalent is an activity plan developed by another agency or permittee that describes grazing management and is approved by the authorized officer, or a plan developed by the BLM for other activities that also includes grazing management prescriptions".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	11	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Affected Interest" -The pre-1994 definition of "affected interest" reads: "Affected Interest" means an individual or organization that has expressed in writing to the authorized officer, (AD), concern for the management of livestock grazing on specific grazing allotments and has been determined by the AD to be an affected interest." OCA proposes the following updated definition of "Affected Interest" in order to effectively distinguish the comments and allow the agency to appropriately respond to permittees and their inherent commitment and investment in the public land resource: "Affected Interest" means an individual or organization in possession of a Preference grazing right as defined in 43CFR § 4100, or its equivalent."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	"Affected Interest" - The pre-Babbitt definition of "affected interest" reads: "Affected Interest" means an individual or organization that has expressed in writing to the authorized officer, (AO), concern for the management of livestock grazing on specific grazing allotments and has been determined by the AO to be an affected interest."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	44	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Original Text: § 1100.0-5 Definitions. Whenever used in this part, unless the context otherwise requires, the following definitions apply: The "Act" means the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.C. 315, 315a-315r). Original text: "Active use" means the current authorized use, including livestock grazing and conservation use. Active use may constitute a portion, or all, of permitted use. Active use does not include temporary nonuse or suspended use of forage within all of a portion of allotment. Proposed text: "Active use" means the current authorized use, including livestock grazing. Active use may constitute a portion, or all, of use preference. Active use does not include temporary nonuse or suspended use of forage within all of a portion of allotment. Original text: "Activity plan" means a plan for managing a resource use of value to achieve specific objectives. For example, an allotment management plan is an activity plan for managing livestock grazing use to improve or maintain rangeland conditions. "Actual use" means where, how many, what kind or class of livestock, and how long livestock graze on an allotment, or on a portion or pasture of an allotment. "Actual use report" means a report of the actual livestock grazing use submitted by the permittee or lessee. Proposed text (new): "Affected Interest" means an individual or organization that has expressed in writing to the authorized officer concern for the management of livestock grazing on a specific grazing allotments and who has been determined by the authorized officer to be an affected interest. Original text: "Affiliate" means an entity of person that controls, is controlled by, or is under common control with, and applicant permittee or lessee. The term "control" means having any relationship which gives an entity or person authority directly or indirectly to determine the manner in which the-an applicant, permittee or lessee conducts grazing operations. Proposed text: "Affiliate" means an entity of person that controls, is controlled by, or is under common control with, an applicant permittee or lessee. The term "control" means having any relationship which gives an entity or person authority directly or indirectly to determine the manner in which an applicant, permittee or lessee conducts grazing operations. Original text: "Allotment" means an area of land designated and managed for grazing of livestock. Orginal text: "Allotment management plan (AMP)" means a documented program developed as an activity plan, consistent with the definition at 43 U.S.C. 17029(k), that focuses on, and contains the necessary instructions for, the management of livestock grazing on specific public lands to meet resource condition, sustained yield, multiple use, economic and other objectives. Proposed text: "Allotment Objectives" means allotment specific measurable proposed outcomes for rangeland resource parameters
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	13	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT: Activity plan means a plan for managing a resource use or value to achieve specific objectives. For example, an allotment management plan is an activity plan for managing livestock grazing use to improve or maintain rangeland conditions. NEW TEXT: Activity plan means a plan for managing a resource use or value to achieve specific land use plan objectives. For example, an allotment management plan is an activity plan for managing livestock grazing use to improve or maintain rangeland conditions consistent with the land use plan. RATIONALE: See inserted text.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	30	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Utilization means the portion of forage that has been consumed by livestock, wild horses and burros, wildlife and insects during a specified period. The term is also used to refer to the pattern of such use. NEW TEXT (5) Utilization means the portion of the current year's forage that has been consumed by livestock, wild horses and burros, wildlife and insects taken at the end of the grazing season or at the end of the growing period, whichever is later. The term is also used to refer to the pattern of such use. RATIONALE See insertions and deletions

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	19	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Trend means the direction of change over time, either toward or away from desired management objectives. NEW TEXT Trend means the direction of change over time, either toward or away from desired management objectives and must be determined with quantitative data collected consistently over multiple years. The objectives, data collection, methods, place and timing should be specific for grazing, because data collection designed for other purposes may not be applicable to evaluating grazing management objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	26	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Rangeland studies means any study methods accepted by the authorized officer for collecting data on actual use, utilization, climatic conditions, other special events, and trend to determine if management objectives are being met. NEW TEXT Rangeland studies means any study methods accepted by the authorized officer and approved for use by BLM Manual, BLM Handbook, or BLM Technical Reference Manual for collecting data on actual use, utilization, climatic conditions, other special events, and trend to determine if applicable management objectives in the land use plan are being met. RATIONALE Comment [AS13]: This clarification is necessary to ensure that BLM, permittees, lessees, and interested publics have a reference from which a particular rangeland study is based, as opposed to any study that an authorized office my choose - that may also not reflect current science or current departmental policy.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	17	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Rangeland studies means any study methods accepted by the authorized of-ficer for collecting data on actual use, utilization, climatic conditions, other special events, and trend to determine if management objectives are being met. NEW TEXT Rangeland studies means scientifically defensible methods supported by rangeland management science for collecting rangeland attribute data , and for analysis, estimating available forage, and developing trends to determine or inform management
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	24	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Permitted use means the forage allocated by, or under the guidance of, an applicable land use plan for livestock grazing in an allotment under a permit or lease and is expressed in AUMs NEW TEXT _____. RATIONALE Comment [AS11]: The term "Permitted use" is removed because of the intended new definition of "Grazing preference" as stated herein.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	20	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT NONE NEW TEXT The specific period for utilization is annual production.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	18	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT NONE NEW TEXT Sustained Yield means the achievement and maintenance in perpetuity of a high-level annual or regular periodic output of the various renewable resources without impairment of the productivity of the land.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	16	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT NONE NEW TEXT Objectives: accomplishable, time constrained activities focusing on rangeland ecological attributes in which rangeland management may have an effect and that upon completion progresses towards the goal. RATIONALE NONE GIVEN
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	23	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Monitoring means the periodic observation and orderly collection of data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives. NEW TEXT Monitoring means the periodic observation and orderly collection of data over time in accordance with Rangeland studies to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meeting management objectives in the land use plan. Monitoring shall consider the ecological site and the ecological site potential in assessing the effects of management actions and the effectiveness of actions in meeting applicable management objectives in the land use plan. RATIONALE See insertions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	22	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Livestock carrying capacity means the maximum stocking rate possible without inducing damage to vegetation or related resources. It may vary from year to year on the same area due to fluctuating forage production. NEW TEXT Livestock Carrying capacity is synonymous with grazing capacity and means a quantifiable number of Animal Unit Months as determined by monitoring that exists on a sustained yield basis upon a given area of public lands and which is consistent with any forage allocation in the land use plan. RATIONALE Comment [AS10]: The redefinition is necessary to negate the perennial confusion by BLM, permittees, lessees, interested publics, and even by the Office of Hearings and Appeals and the Federal Courts as to concept of carrying capacity and grazing capacity. It must be clarified that carrying capacity is a quantifiable number and distinct from resource objectives (and any related terms to achieve such objectives, i.e. management practices). See Riddle Ranches, Inc. v. BLM, 138 IBLA 82, 9394 (1997) (wherein the Board stated, citing the ALJ Decision, that "... it is not possible to quantify the purported necessary reduction or the correct carrying capacity by reference to the ecological condition of the land and the trend data (Tr. 416420, 476). In sum, neither the 197981 Inventory nor the trend studies nor a combination of the two provides a reliable basis for estimating the carrying capacity of the range (Tr. 205, 416420, 447, 451, 476, 782782, 1543) and thus the estimation derived therefrom is clearly erroneous. At best, the trend studies indicate the need for some reduction in grazing use, but they do not permit reliable quantification of the reduction. Therefore, the reduction or Riddle Ranches' active grazing preference to the carrying capacity estimated by the 197981 Inventory must be set aside.")
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	14	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Interested public means an individual, group or organization that has submitted a written request to the authorized officer to be provided an opportunity to be involved in the decisionmaking process for the management of livestock grazing on specific grazing allotments or has submitted written comments to the authorized officer regarding the management of livestock grazing on a specific allotment. NEW TEXT DELETED OLD TEXT. RATIONALE The public has no right or experience in "management of livestock grazing" and should not be included within the grazing regulations. NEPA (43 CFR part 1600) allows the public an opportunity to provide input and opinion.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	21	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Interested public means an individual, group or organization that has submitted a written request to the authorized officer to be provided an opportunity to be involved in the decision making process for the management of livestock grazing on specific grazing allotments or has submitted written comments to the authorized officer regarding the management of livestock grazing on a specific allotment. NEW TEXT Interested public means an individual, group or organization that has annually submitted a written request to the authorized officer to be provided an opportunity to be involved in the decision making process for the management of livestock grazing on specific grazing allotments or has submitted written comments to the authorized officer during the last grazing season regarding the management of livestock grazing on a specific allotment. RATIONALE Comment [AS9]: This clarification is necessary because BLM needs to more periodically update its "Interested public" list. There has been more than several occasions wherein BLM wastes resources and permittees/lessee/interested publics waste resources on mailing documents, decisions, or appeals to those that no longer have any interest in an allotment, but yet they indefinitely remain on the interested public list. The redefinition will ensure that those interested publics that are interested in an allotment(s) will annually and affirmatively inform BLM of its interest.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	20	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Grazing preference or preference means a superior or priority position against others for the purpose of receiving a grazing permit or lease. This priority is attached to base property owned or controlled by the permittee or lessee. NEW TEXT Grazing preference or preference means the total number of animal unit months of livestock grazing on public lands apportioned and attached to base property. Grazing preference includes Active use and Suspended use. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. RATIONALE Comment [AS8]: "Grazing preference" should be redefined to be consistent with the definitions in the 1989 Hodel Rules and in the 2016 Bush Rules. The U.S. Supreme Court confirmed in Public Lands Council v. Babbitt, 529 U.S. 728, 747, 120 S.Ct. 1815, 146 L.Ed. 2d 753 (2000), the authority of the Secretary to define or redefine the definition of "Grazing preference", and it is contended that this proposed definition conforms to what was previously and historically used at and before the time of the 1989 Hodel Rules.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Conservation use means an activity, excluding livestock grazing, on all or a portion of an allotment for purposes of- (1) Protecting the land and its resources from destruction or unnecessary injury; (2) Improving rangeland conditions; or (3) Enhancing resource values, uses, or functions NEW TEXT DELETED OLD TEXT. RATIONALE See comment under "Active Use" and Public Lands Council v. Babbitt, 167 F.3d 1287.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	15	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Cancelled or cancellation means a permanent termination of a grazing permit or grazing lease and grazing preference, or free use grazing permit or other grazing authorization, in whole or in part. NEW TEXT Cancelled or cancellation means a permanent termination of a grazing permit or grazing lease and grazing preference, or free use grazing permit, or other grazing authorization, in whole or in part. If a grazing permit or grazing lease are cancelled in whole than the grazing preference is cancelled too. RATIONALE Comment [AS4]: This amendment is necessary to distinguish between the partial cancellation and the whole cancellation of a grazing permit or lease. If there is only a partial cancellation, then the grazing preference remains and is not cancelled. However, if there is a whole cancellation, then the grazing preference is cancelled.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Animal unit month (AUM) means the amount of forage necessary for the sus-tenance of one cow or its equivalent for a period of 1 month. NEW TEXT Animal unit month (AUM) means the amount of forage necessary for the sustenance of one cow and her calf up to 6 months of age or its equivalent for a period of 1 month.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Affiliate means an entity or person that controls, is controlled by, or is under common control with, an applicant, permittee or lessee. The term "control" means having any relationship which gives an entity or person authority directly or indirectly to determine the manner in which an applicant, permittee or lessee conducts grazing operations. NEW TEXT NONE RATIONALE This definition of control is different than the one below. It is unclear on the need for an "affiliate" to be part of permitted grazing, if they are not an applicant, permittee or lessee, what is the purpose? An example may help explain the purpose or reason.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	3	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Active use means the current authorized use, including livestock grazing and conservation use. Active use may constitute a portion, or all, of permitted use. Active use does not include temporary nonuse or suspended use of forage within all or a portion of an allotment. NEW TEXT Active use means the current authorized use, including livestock grazing and . Active use may constitute a portion, or all, of permitted use. Active use does not include temporary nonuse or suspended use of forage within all or a portion of an allotment. RATIONALE "Rather than annually evaluating range conditions to determine whether grazing levels should increase or decrease, as is done with temporary non-use, the Secretary's conservation use rule authorizes placement of land in non-use for the entire duration of a permit. This is an impermissible exercise of the Secretary's authority under section three of the Taylor Grazing Act of 1924 (TGA) because land that he has designated as "chiefly valuable for grazing livestock" will be completely excluded from grazing use even though range conditions could be good enough to support grazing. Congress intended that once the Secretary established a grazing district under the TGA, the primary use of that land should be grazing. ... We hold that the Secretary lacks the statutory authority to issue grazing permits intended exclusively for conservation use. Because there is no set of circumstances under which the Secretary could issue such a permit, the new conservation use regulation is invalid on its face". (Public Lands Council v. Babbitt, 167 F.3d 1287)

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357		Subpart 4100 - Grazing Administration - Exclusive of Alaska; General 4	OLD TEXT NEW TEXT Actual use report means a report of the actual livestock grazing use submitted by the permittee or lessee. Adaptive resource management (adaptive management) means treating management as an adaptive learning process, where management activities themselves are viewed as the primary tool for experimentation; this requires developing scientifically defensible data to evaluate management outcomes associated with specific management objectives and to inform potential changes in management. Affected stakeholder means an individual or entity in possession of a contract, lease or permit, right-ofway, easement or private property whose investment, management, earning or livelihood may be effected by a federal action. RATIONALE The BLM should be held to high standards with regards to monitoring, consultation, coordination and cooperation in management and decision-making because their decisions have direct and indirect impacts on cultures, communities, business, and families. BLM management decisions have direct impacts on economics (increased expenses and reduced incomes) of families, businesses, and communities. The long-term impacts could include the unwillingness to invest in the federal lands with constantly changing rules and regulations creating uncertainty in tenure of grazing and management. Poorly developed and indefensible data on rangeland conditions (rangeland health) creates a negative public perception of livestock grazing on federal lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Dearing Ranch		1311		Subpart 4100 - Grazing Administration - Exclusive of Alaska; General 1	OLD TEXT NEW TEXT 43 C.F.R. § 4100.0-5 Definitions. Grazing preference and preference: Restore pre-1995 definitions including a priority position for renewal of a grazing permit. Permits should recognize and restore AUMs levels reduced solely as a result of application of the 1995 change in definition. This does not suggest that AUM changes made as a result of monitoring or other range conditions should not be changed without proper analysis. Suggested language: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension, and other authorized forms of use. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans." Carrying capacity: The phrase "carrying capacity" should be changed to "Domestic livestock carrying capacity" and be defined as: Domestic livestock carrying capacity is a quantifiable number of Animal Unit Months as determined by rangeland studies on a sustainable yield basis that will not induce damage to vegetation or related resources. RATIONALE NONE GIVEN

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357		2 Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT NEW TEXT § 4100.0-2 Objectives. The objectives of these regulations are to promote healthy sustainable and improve rangeland ecosystems; to accelerate restoration and improvement of public rangelands to properly functioning conditions; to promote the orderly use, improvement and development of the public lands; to establish efficient and effective administration of grazing of public rangelands; and to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, healthy public rangelands. These objectives shall be realized in a manner that is consistent with land use plans, multiple use, sustained yield, environmental values, economic productivity and other objectives stated in 43 CFR part 1720, subpart 1725; the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.C. 315, 315a-315r); section 102 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1740). RATIONALE Healthy, proper functioning, and environmental values are value-laden terms, subjective and can't be measured, these are not good objectives and these terms can't be found in statute. An objective should be accomplishable and time constrained with monitoring that measures the progress or achievement of the objective. "accelerate restoration and improvement", this objective assumes there has been no improvement of BLM lands since 1934 (everything is in bad shape and it is due to grazing). Couldn't the agency admit that there has been improvements in the rangeland and come up with an objective that starts at a positive place to make improvements? "sustainability of the western livestock industry and communities" where within these regulations is this considered or regulated? The economics of these regulations, and in our experience the planning by the BLM, is an afterthought, but never an objective.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261		7 Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Carrying capacity: The phrase "carrying capacity" should be changed to "Domestic livestock carrying capacity" and be defined as: Domestic livestock carrying capacity is a quantifiable number of Animal Unit Months as determined by rangeland studies on a sustainable yield basis that will not induce damage to vegetation or related resources. Domestic livestock carrying capacity should refer to only the forage appropriated to livestock not total forage availability. Distinction must be made between livestock forage and forage appropriated to wildlife, wild horses and burros, and other conservation purposes in order to comply with the Bureau's multiple-use mandate. This will allow BLM to better determine the causal factors of adverse range conditions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Waite	Anita M.	Big Sandy NRDC	AZ	1437		3 Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	4100.0-5 Public Lands: Public lands should be referred to as Federal lands. Everywhere the statement "public lands" appears in the regulations it should be changed to "Federal lands". The term public lands misleads' a segment of the public into believing they are the owners of the land along with any improvements. Improvements are owned for the most part, by the ranchers. The public is led to believe they have the right do whatever they want on said lands along with the rancher's improvements, as well as, land owned by others within the allotment.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	11	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	§ 4100.0-2 Objectives. OLD TEXT: The objectives of these regulations are to promote healthy sustainable rangeland ecosystems; to accelerate restoration and improvement of public rangelands to properly functioning conditions; to promote the orderly use, improvement and development of the public lands; to establish efficient and effective administration of grazing of public rangelands; and to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, healthy public rangelands. NEW TEXT: The objectives of these regulations are to promote healthy sustainable rangeland ecosystems; ____; to promote the orderly use, improvement and development of the public lands; to establish efficient and effective administration of grazing of public rangelands; and to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, healthy public rangelands. RATIONALE: Comment [AS2]: This part of the "Objectives" should be removed because this objective may or may not be consistent with the applicable land use plans. These objectives shall be realized in a manner that is consistent with land use plans, multiple use, sustained yield, environmental values, economic and other objectives stated in 43 CFR part 1720, subpart 1725; the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.C. 315, 315a-315r); section 102 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1740). [60 FR 9960, Feb. 22, 1995]
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallidge	Samuel		NM	1319	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	§ 4100.0-2 Objectives We recommend deleting references to health of rangelands throughout the document, as it is a value- laden term that is not quantifiable in an agreeable nor timely and cost efficient manner. Similarly, we suggest deleting proper functioning condition throughout the document. Use of the phrase "proper functioning condition" is value-laden and difficult to determine in a scientifically defensible manner. Furthermore, established methods for determination tend to be subjective, one-time assessments, and not capable to quantifying incremental change among years. The hallmarks of science - objectivity, repeatability and quantitative methods - are best suited to provide reliable knowledge and ensure scientific defensibility. OLD TEXT: The objectives of these regulations are: to promote healthy sustainable rangeland ecosystems, and to accelerate restoration and improvement of public rangelands as guided by science to properly functioning conditions; to promote the orderly use, improvement and development of the rangelands; to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, healthy public rangelands. These objectives shall be realized in a manner that is consistent with, land use plans, multiple use, sustained yield, environmental values, economic and other objectives stated in 43 CFR part 1720, subpart 1725; the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.C. 315, 315a-315r); section 102 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1740). NEW TEXT: The objectives of these regulations are: 1) to maintain, restore or improve rangeland ecosystems, 2) to establish efficient and effective administration of grazing of public rangelands, and 3) promote the utilization of rangelands for the benefit of the western livestock industry and communities that rely on them. These objectives shall be realized in a manner that is consistent with, land use plans, multiple use, sustained yield, economic and other objectives stated in 43 CFR part 1720, subpart 1725; the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.C. 315, 315a-315r); section 102 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1740).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	Tony		ID	1087	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	“Interested Public” This is another area where we have seen attempts for disruption of the management for BLM and the ability of the permittees to have certainty, consistency, and standing on the administrative actions due to those claiming to be “interested public” but again, having underlying agendas While we understand and fully support multiple use and the public access to public lands, we do not support those claiming “interested public” to have the ability to directly affect and influence administrative actions arbitrarily. Those truly wanting to be considered as interested public should so at the (AMP) level or the renewal of an AMP, not at the permit renewal process. Law provides opportunities for public participation, and we support participation where defined and appropriate. The definition needs to be clear which members of the public can appeal and administrative action and clarify that the participation begins in the public comment period of the allotment management plan not at the decision level: the law must make clear those members of the public that can truly appeal an administrative action Furthermore the individual, group, or organization must have submitted written comments to BLM on specific concerns those written comments must be submitted during the public comment period for a new or renewed AMP and submitted in writing a request to the Authorized Officer to be interested public in specific allotment or allotments
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Muise	Brian			1300	1	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	-- The language contained in the regulations must be modified to eliminate subjective terminology such as "healthy" and "proper" -- terms that are not clearly defined and subject to biased interpretation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	29	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Trend means the direction of change over time, either toward or away from desired management objectives. NEW TEXT Trend means the direction of change over time, either toward or away from the applicable desired management objectives in an activity plan or land use plan RATIONALE Comment [AS16]: "Trend" should be redefined to be ensure that it is based upon objectives within an "Activity plan" or within the Land Use Plan, as opposed to some undocumented objective.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	21	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT The authorized officer shall manage livestock grazing on public lands under the principle of multiple use and sustained yield, and in accordance with applicable land use plans. Land use plans shall establish allowable resource uses (either singly or in combination), related levels of production or use to be maintained, areas of use, and resource condition goals and objectives to be obtained. The plans also set forth program constraints and general management practices needed to achieve management objectives. Livestock grazing activities and management actions approved by the authorized officer shall be in conformance with the land use plan as defined at 43 CFR 1601.0-5(b). NEW TEXT NONE RATIONALE Shouldn't this be covered under 43 CFR Part 1600 - PLANNING, PROGRAMMING, BUDGETING?Why does it have to be restated in the grazing regulations?

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	28	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Temporary nonuse means the authorized withholding, on an annual basis, of all or a portion of permitted livestock use in response to a request of the permittee or lessee. NEW TEXT Temporary nonuse means the authorized withholding, on an annual basis, of all or a portion of a Grazing preference from Active use through a decision issued by the authorized officer, by agreement with a permittee or lessee, in response to a request of the permittee or RATIONALE Comment [AS15]: "Temporary nonuse" should be redefined to be consistent with the definitions in the 1989 Hodel Rules and in the 2016 Bush Rules, as well as the redefined definition of "Grazing preference" proposed herein, as well as the means that such nonuse may be authorized.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	25	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Range improvement means an authorized physical modification or treatment which is designed to improve production of forage; change vegetation composition; control patterns of use; provide water; stabilize soil and water conditions; restore, protect and improve the condition of rangeland ecosystems to benefit livestock, wild horses and burros, and fish and wildlife. The term includes, but is not limited to, structures, treatment projects, and use of mechanical devices or modifications achieved through mechanical means. NEW TEXT Range improvement means an authorized installation, modification or treatment which is designed to improve production of forage; change vegetation composition; control patterns of use; provide water; stabilize soil and water conditions; restore, protect and improve the condition of rangeland ecosystems to benefit livestock, wild horses and burros, and fish and wildlife. The term includes, but is not limited to, structures, treatment projects, and use of mechanical devices or modifications achieved through mechanical means. RATIONALE Comment [AS12]: The definition should include "installation" since range improvements are inclusive of the authorization to construct an improvement, to modify an improvement, to remove an improvement, or to treat an area.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	13	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Grazing permit means a document authorizing use of the public lands within an established grazing district. Grazing permits specify all authorized use including livestock grazing, suspended use, and conservation use. Permits specify the total number of AUMs apportioned, the area authorized for grazing use, or both. NEW TEXT Grazing permit means a document authorizing use of the public lands within an established grazing district. Grazing permits specify all authorized use including livestock grazing, suspended use, and . Permits specify the total number of AUMs apportioned, the area authorized for grazing use, or both.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	19	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Grazing permit means a document authorizing use of the public lands within an established grazing district. Grazing permits specify all authorized use including livestock grazing, suspended use, and conservation use. Permits specify the total number of AUMs apportioned, the area authorized for grazing use, or both. NEW TEXT Grazing permit means a document authorizing grazing use of the public lands under Section 3 of the Act. A Grazing permit specifies Grazing preference and the terms and conditions under which permittees may make grazing use during the term of the permit. RATIONALE Comment [AS7]: "Grazing lease" and "Grazing permit" should be redefined to be consistent with the definitions in the 1989 Hodel Rules and in the 2016 Bush Rules, as well as the redefined definition of "Grazing preference" proposed herein.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	12	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Grazing lease means a document authorizing use of the public lands outside an established grazing district. Grazing leases specify all authorized use including livestock grazing, suspended use, and conservation use. Leases specify the total number of AUMs apportioned, the area authorized for grazing use, or both. NEW TEXT Grazing lease means a document authorizing use of the public lands outside an established grazing district. Grazing leases specify all authorized use including livestock grazing, suspended use, . Leases specify the total number of AUMs apportioned, the area authorized for grazing use, or both. RATIONALE NONE GIVEN
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	17	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Consultation, cooperation, and coordination means interaction for the purpose of obtaining advice, or exchanging opinions on issues, plans, or management actions. NEW TEXT Consultation, cooperation, and coordination means interaction for the purpose of obtaining advice, or exchanging opinions on issues, plans, or management actions. As part of this interaction, the authorized officer shall provide to affected permittees or lessees, States having lands or responsibility for managing resources within the affected area, and the interested public an opportunity to review reports that evaluate monitoring that are used as a basis for making decisions in advance of any decision issued under subpart 4160, unless the authorized officer independently determines it is not practical to do so due to emergent conditions. RATIONALE Comment [AS6]: It is necessary that ccc be defined to be inclusive of the affirmative obligation for the authorized officer to disclose reports in advance of any decision making.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Cancelled or cancellation means a per-manent termination of a grazing per-mit or grazing lease and grazing pref-erence, or free-use grazing permit or other grazing authorization, in whole or in part. NEW TEXT Cancelled or cancellation means a permanent termination of a grazing permit or grazing lease, or free-use grazing permit or other grazing authorization, in whole or in part.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	14	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Allotment management plan (AMP) means a documented program developed as an activity plan, consistent with the definition at 43 U.S.C. 1702(k), that focuses on, and contains the necessary instructions for, the management of livestock grazing on specified public lands to meet resource condition, sustained yield, multiple use, economic and other objectives. NEW TEXT Allotment management plan(AMP) means a documented program developed as an activity plan, consistent with the definition at 43 U.S.C. 1702(k), that focuses on, and contains the necessary instructions for, the management of livestock grazing on specified public lands to meet resource condition, sustained yield, multiple use, economic and other applicable objectives in the land use plan. RATIONALE See inserted text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	6	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Active use means the current author-ized use, including livestock grazing and conservation use. Active use may constitute a portion, or all, of per-mitted use. Active use does not include temporary nonuse or suspended use of forage within all or a portion of an al-lotment. NEW TEXT "Active use" means the current authorized use, including livestock grazing. Active use may constitute a portion, or all, of active use preference. Active use does not include temporary nonuse or suspended use of forage within all of a portion of allotment.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	30	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Utilization means the portion of for-age that has been consumed by live-stock, wild horses and burros, wildlife and insects during a specified period. The term is also used to refer to the pattern of such use. NEW TEXT "Utilization" means the percentage of forage that has been consumed at the end of the grazing season or the grazing season whichever is later.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	4	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT The objectives of these regulations are to promote healthy sustainable rangeland ecosystems; to accelerate restoration and improvement of public rangelands to properly functioning conditions; to promote the orderly use, improvement and development of the public lands; to establish efficient and effective administration of grazing of public rangelands; and to provide for the sustainability of the western live-stock industry and communities that are dependent upon productive, healthy public rangelands. These objectives shall be realized in a manner that is consistent with land use plans, mul-tiple use, sustained yield, environ-mental values, economic and other ob-jectives stated in 43 CFR part 1720, sub-part 1725; the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.C. 315, 315a-315r); section 102 of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1740). NEW TEXT The objectives of these regulations are to enhance healthy sustainable rangeland ecosystems; to improve resource conditions; ; to promote orderly use and development of the public lands; to establish efficient and effective administration of grazing of public rangelands; and to provide for the sustainability of the western livestock industry and communities that are dependent upon productive, healthy public rangelands. These objectives shall be realized in a manner that recognizes the requirements of the Taylor Grazing Act and reflects multiple use, sustained yield, environmental values, economic and other objectives stated in 43 CFR part 1720, subpart 1725; the Taylor Grazing Act of June 28, 1934, as amended (43 U.S.C. 315, 315a-315r); section 102 of the Federal Land Policy Management Act of 1976 (43 U.S.C. 1740) and the Public Rangeland Improvement Act of 1978 (PRIA) (Pub.L. 95-514)§ 4100.0-3 Authority.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	29	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Temporary nonuse means the author-ized withholding, on an annual basis, of all or a portion of permitted livestock use in response to a request of the per-mittee or lessee. NEW TEXT "Temporary nonuse" means the authorized withholding, on an annual basis, of all or a portion of active use in response to a request of the permittee or lessee.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	27	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Suspension means the temporary withholding from active use, through a decision issued by the authorized officer or by agreement, of part or all of the permitted use in a grazing permit or lease. NEW TEXT Suspension or "Suspended use" means the temporary withholding, in whole or in part, a Grazing preference from Active use, through a decision issued by the authorized officer or by agreement with a permittee or lessee. RATIONALE Comment [AS14]: "Suspension" should be redefined to be consistent with the definitions in the 1989 Hodel Rules and in the 2016 Bush Rules, as well as the redefined definition of "Grazing preference" proposed herein.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	26	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Service area means the area that can be properly grazed by livestock water-ing at a certain water. NEW TEXT "Service area" means the area that can be properly grazed by livestock watering at a certain water as may be necessary to permit the proper use of lands, water or water rights owned, occupied or leased by owners of water or water rights. "State Director" means the State Director, Bureau of Land Management, or his or her authorized representative.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	25	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Range improvement means an author-ized physical modification or treat-ment which is designed to improve pro-duction of forage; change vegetation composition; control patterns of use; provide water; stabilize soil and water conditions; restore, protect and im-prove the condition of rangeland eco-systems to benefit livestock, wild horses and burros, and fish and wild-life. The term includes, but is not lim-ited to, structures, treatment projects, and use of mechanical devices or modi-fications achieved through mechanical means. NEW TEXT "Range improvement" means an authorized physical modification or treatment which is designed to improve production of forage; change vegetation composition; control patterns of use; provide water; stabilize soil and water conditions; restore, protection and improve the condition of rangeland ecosystems to benefit livestock, wild horses and burros, and fish and wildlife. The term includes, but is not limited to, structures, treatment projects, and use of mechanical devices or modifications achieved through mechanical means. "Rangeland studies" means any study methods approved by the BLM Manuals, BLM Handbook or BLM Technical Reference Manualfor collecting data on actual use, utilization, climatic conditions, other special events, and trend to determine if management objectives are being met. "Secretary" means the Secretary of the Interior or his authorized officer.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	27	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT NONE NEW TEXT "Subleasing" means- the act of a permittee or lessee entering into an agreement that either: (1) allows someone other than the permittee or lessee to graze livestock on public lands without controlling the base property the base property supporting the permit or lease or (2) allows grazing on the public lands by livestock that are not owned and controlled by the permittee or lessee. To sublease, the authorized officer must be supplied with documentation that verifies the arrangement and specifies who is responsible for maintaining the terms and conditions of the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	18	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT NONE NEW TEXT "Impoundment" means to seize and retain in custody of unauthorized livestock on public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	7	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT NONE NEW TEXT "Affected Interest" means an individual or organization that has expressed in writing to the authorized officer concern for the management of livestock grazing on a specific grazing allotments and who has been determined by the authorized officer to be an affected interest.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	13	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT NONE NEW TEXT "Coordination" mean as it applies to State, Tribal and Local Governments and the Bureau of Land Management interacting government to government as equals, of the same order, rank, or degree of importance. Not subordinate.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	9	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT NONE NEW TEXT "Allotment Objectives" means allotment specific measurable proposed outcomes for rangeland resource parameters and other items that contribute to the sustainability of the permittees and/or the lessees on the allotment after a process of careful and considered consultation, coordination, cooperation, between the permittees or lessees, State Trust Lands and the BLM.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	15	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Monitoring means the periodic obser-vation and orderly collection of data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meet-ing management objectives. NEW TEXT Monitoring means the systematic collection of objective, repeatable and quantified data designed to measure specific rangeland attributes and be based on specific management objectives. Monitoring methods must be scientifically defensible, consistent, continuous, and comparable. It should also describe natural range of variability, inferential space for interpretation and specific analyses to evaluate: (1) Effects of grazing or rangeland improvement management actions; and (2) Effectiveness of grazing management actions in meeting grazing management objectives. (3) Inform adaptive resource management. RATIONALE Is this specific to grazing "management actions and objectives" or overall management and objectives? Monitoring should be more specific than "periodic observation and orderly collection of data", if "effects" or "effectiveness" is to be evaluated, then monitoring and associated objectives should focus on the collection of quantitative data using unbiased methods specifically designed to evaluate grazing management and development of trends. This data should be collected consistently, both temporally and spatially, using scientifically comparable methods.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	20	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Livestock carrying capacity means the maximum stocking rate possible with-out inducing damage to vegetation or related resources. It may vary from year to year on the same area due to fluctuating forage production. NEW TEXT "Livestock carrying capacity" means the stocking rate to support grazing domestic livestock such as cattle, sheep, horses or burros. It may vary from year to year based on fluctuating forage production.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	21	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Livestock carrying capacity means the maximum stocking rate possible with-out inducing damage to vegetation or related resources. It may vary from year to year on the same area due to fluctuating forage production. NEW TEXT "Livestock carrying capacity" means the stocking rate to support grazing domestic livestock such as cattle, sheep, horses or burros. It may vary from year to year based on fluctuating forage production.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	22	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Livestock carrying capacity means the maximum stocking rate possible with-out inducing damage to vegetation or related resources. It may vary from year to year on the same area due to fluctuating forage production. NEW TEXT "Livestock carrying capacity" means the stocking rate to support grazing domestic livestock such as cattle, sheep, horses or burros. It may vary from year to year based on fluctuating forage production.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	19	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Land use plan means a resource man-agement plan, developed under the pro-visions of 43 CFR part 1600, or a man-agement framework plan. These plans are developed through public participa-tion in accordance with the provisions of the Federal Land Policy and Man-agement Act of 1976 (43 U.S.C 1701 et seq.) and establish management direc-tion for resource uses of public lands. NEW TEXT "Land use plan" means a resource management plan or management framework plan. These plans must be developed under the direction provided under the policy of the Secretary of the Interior and in accordance with the provisions of the Federal Land Policy and Management Act and establish management direction for resource uses on public lands. "Livestock" or "kind of livestock" means species of domestic livestock-cattle, sheep, horses, burros, and goats.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	14	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Grazing lease means a document au-thorizing use of the public lands out-side an established grazing district. Grazing leases specify all authorized use including livestock grazing, sus-pended use, and conservation use. Leases specify the total number of AUMs apportioned, the area authorized for grazing use, or both. NEW TEXT "Grazing lease" means a document authorizing use of the public lands outside an established grazing districts.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	10	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Cancelled or cancellation means a per-manent termination of a grazing per-mit or grazing lease and grazing pref-erence, or free-use grazing permit or other grazing authorization, in whole or in part. NEW TEXT "Cancelled or cancellation" means a permanent termination of a grazing permit or grazing lease, or free-use grazing permit or other grazing authorization, in whole or in part.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	8	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Affiliate means an entity or person that controls, is controlled by, or is under common control with, an appli-cant, permittee or lessee. The term "control" means having any relation-ship which gives an entity or person authority directly or indirectly to de-termine the manner in which an appli-cant, permittee or lessee conducts grazing operations. NEW TEXT "Affiliate" means an entity of person that controls, is controlled by, or is under common control with, an applicant permittee or lessee. The term "control" means having any relationship which gives an entity or person authority directly or indirectly to determine the manner in which an applicant, permittee or lessee conducts grazing operations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	5	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT [43 FR 29067, July 5, 1978, as amended at 49 FR 6449, Feb. 21, 1984; 49 FR 12704, Mar. 30, 1984; 50 FR 45827, Nov. 4, 1985; 61 FR 4227, Feb. 5, 1996] NEW TEXT DELETED OLD TEXT

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	Tony		ID	1088	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	“Utilization” In reference to utilization in the current regulations, it should be changed to reflect that utilization refers to a certain amount of the current year’s forage production that has been consumed by livestock. It should also reflect that this should be measured at the end of that year’s growing season.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	31	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT The authorized officer shall manage livestock grazing on public lands under the principle of multiple use and sus-tained yield, and in accordance with applicable land use plans. Land use plans shall establish allowable resource uses (either singly or in combination), related levels of production or use to be maintained, areas of use, and resource condition goals and objectives to be ob-tained. The plans also set forth pro-program constraints and general manage-ment practices needed to achieve man-agement objectives. Livestock grazing activities and management actions ap-proved by the authorized officer shall be in conformance with the land use plan as defined at 43 CFR 1601.0-5(b). NEW TEXT The authorized officer shall manage livestock grazing on public lands under the principle of multiple use and sustained yield, and allow for adaptive management, and in accordance with applicable land use plans. Land use 43 CFR Ch. 11 (10-1-94 Edition) plans shall establish allowable resource uses (either singly or in combination), related levels of production or use to be maintained, areas of use, and resource condition goals and objectives to be obtained. The plans also set forth program constraints and general management practices needed to achieve management objectives. Livestock grazing activities and management actions approved by the authorized officer shall be in conformance with the land use plan as defined at 43 CFR 1601.0-5(b).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	23	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Monitoring means the periodic obser-vation and orderly collection of data to evaluate: (1) Effects of management actions; and (2) Effectiveness of actions in meet-ing management objectives. NEW TEXT "Monitoring" means the use of science-based field methods to assess, with qualitative data, the direction of the trend for accomplishment of allotment objectives or the orderly collection of data using scientifically- based techniques to determine the trend or condition of rangeland resources. Data may include historical information, but must be sufficiently reliable to evaluate: (a) Effects of ecological change and management action; and (b) Effectiveness of actions in meeting management objectives. Monitoring shall consider the ecological site potential in assessing the effects of actions in meeting management objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	11	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Conservation use means an activity, excluding livestock grazing, on all or a portion of an allotment for purposes of- (1) Protecting the land and its re-sources from destruction or unneces-sary injury; (2) Improving rangeland conditions; or (3) Enhancing resource values, uses, or functions. NEW TEXT DELETED OLD TEXT.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Dearing Ranch		1311	2	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	Domestic livestock carrying capacity should refer to only the forage appropriated to livestock not total forage availability. Distinction must be made between livestock forage and forage appropriated to wildlife, wild horses and burros, and other conservation purposes in order to comply with the Bureau's multiple-use mandate. This will allow BLM to better determine the causal factors of adverse range conditions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	28	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Supplemental feed means a feed which supplements the forage available from the public lands and is provided to im-prove livestock nutrition or rangeland management. NEW TEXT "Supplemental feed" means a feed which supplements the forage available from the public lands and is provided to improve livestock nutrition or rangeland management. "Suspended Use" means temporarily withholding in whole or in part, a grazing preference from active grazing use. The withholding may be done voluntarily by the permittee or lessee or through a decision issued by authorized officer or by agreement, of part or all of the active use in a grazing permit or lease.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	24	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Permitted use means the forage allo-cated by, or under the guidance of, an applicable land use plan for livestock grazing in an allotment under a permit or lease and is expressed in AUMs. NEW TEXT DELETED OLD TEXT.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	15	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Grazing permit means a document au-thorizing use of the public lands within an established grazing district. Grazing permits specify all authorized use in-cluding livestock grazing, suspended use, and conservation use. Permits specify the total number of AUMs ap-portioned, the area authorized for graz-ing use, or both. NEW TEXT "Grazing permit" means a document authorizing use of the public lands within an established grazing district(s) under section 3 of the act for the purpose of livestock grazing. Grazing permits specify all authorized use including livestock grazing, suspended use, and conservation use. Permits specify the total number of AUMs apportioned, the area authorized for grazing use, or both.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	17	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Grazing permit means a document au-thorizing use of the public lands within an established grazing district. Grazing permits specify all authorized use in-cluding livestock grazing, suspended use, and conservation use. Permits specify the total number of AUMs ap-portioned, the area authorized for graz-ing use, or both. NEW TEXT "Grazing permit" means a document authorizing use of the public lands within an established grazing district(s) under section 3 of the act for the purpose of livestock grazing. Grazing permits specify all authorized use including livestock grazing, suspended use, and conservation use. Permits specify the total number of AUMs apportioned, the area authorized for grazing use, or both.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	16	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Grazing permit means a document au-thorizing use of the public lands within an established grazing district. Grazing permits specify all authorized use in-cluding livestock grazing, suspended use, and conservation use. Permits specify the total number of AUMs ap-portioned, the area authorized for graz-ing use, or both. NEW TEXT "Grazing permit" means a document authorizing use of the public lands within an established grazing district(s) under section 3 of the act for the purpose of livestock grazing. Grazing permits specify all authorized use including livestock grazing, suspended use, and conservation use. Permits specify the total number of AUMs apportioned, the area authorized for grazing use, or both.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	12	Subpart 4100 - Grazing Administration - Exclusive of Alaska; General	OLD TEXT Consultation, cooperation, and coordi-nation means interaction for the pur-pose of obtaining advice, or exchanging opinions on issues, plans, or manage-ment actions. NEW TEXT "Consultation, cooperation and coordination" means an interactive process for advice, seeking advice, agreement or interchange of opinions on issues, plans or management actions from other agencies and affected permittee(s) or lessee(s), landowners involved, the district grazing advisory board, any State having lands within the area to be covered by a.
Subpart 4110 - Qualifications and Preference								

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schuldt	Cheryl	North Blaine Co Coop State Grazing District	MT	957	4	Subpart 4110 - Qualifications and Preference	We also strongly urge BLM to maintain the three year multiple use language so that grazing allotments can't be retired.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	19	Subpart 4110 - Qualifications and Preference	When wildfire requires the reduction of AUMS available for a permittee the BLM should restore those AUMs as quickly as possible.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris			1188	7	Subpart 4110 - Qualifications and Preference	Immediately restore all suspended AUMs on all grazing permits Nationwide. This includes permanently suspended AUMs. Our estimates are that this action would nearly double the number of animals eligible to graze the range and consume dangerous, excess fuels from the public lands. (Require federal agencies to give specific, proven science based reasons for any AUMs not eligible for this action, and require the agency to prove that their action is in best overall interest of the resource)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Zarrello	Dana	The Cloud Foundation		1337	6	Subpart 4110 - Qualifications and Preference	The understatement of forage consumption and overstocking of allotments results in extensive livestock damage to the range. This understatement of livestock usage must be taken into consideration and analyzed. Mature beef cows and weaned calves weigh 30-40% more than their counterparts in 1970. As a result, individual animals consume far larger amounts of forage than is currently calculated per AUM. (https://www.feedstuffs.com/markets/beef-production-projected-achieve-new-record-2020) Based on obsolete AUM calculations, The numbers of cattle currently permitted on public lands now significantly exceed carrying capacity, resulting in ongoing degraded rangeland quality. There is ample evidence that the current AUM cow/calf pair forage consumption is out of date and that cattle are substantially larger than when the AUM system was introduced more than 60 years ago, thereby warranting revising to the AUM cow/calf pair forage consumption equation. The following are just a few citations supporting this.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	27	Subpart 4110 - Qualifications and Preference	We support an Instruction Memo to all field offices to assess if rangeland management tools other than reductions in active AUMs will accomplish allotment objectives. BLM should document when other factors, such as fire, roads, wild horses, drought, or invasive species impact rangeland conditions. Changes to BLM management should address the cause of problems, not simply reduce livestock grazing. When grazing plays a role in problems, it is important to use appropriate management, not just reduce AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	11	Subpart 4110 - Qualifications and Preference	Suspended AUMs The UCCA has members that currently have suspended AUMs in nonuse. The BLM has not allowed use of these suspended AUMs for years nor have they created a review process to determine if the suspended AUMs could be reinstated. A solution would be to change the current regulation to require the BLM to review these suspended AUMs in a timely manner or reinstate the AUMs and allow them to be part of the yearly grazing review and management.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hall	D. Shane	Crawford Cattle LLC	NV	615	2	Subpart 4110 - Qualifications and Preference	-Release of Suspended AUMs -Many permits have AUMs that are suspended. In most cases it's unclear as to why they were suspended in the first place. Although the Code of Federal Regulations 4110.3-1 addresses this topic, we have never seen suspended AUMs placed back onto active status regardless of feed availability or as the regulation states "sustainable yield". The process of having them placed to Active AUMs needs to be clarified and streamlined. One reason the Martin Fire was so bad is that there are nearly 20,000 suspended AUMs with that permit and the fuel load was built up over the years due to under grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Hank	Nevada State Grazing Board N2 District	NV	1471	2	Subpart 4110 - Qualifications and Preference	Regarding altered land-management practices, the Board strongly suggests that AUM reductions be the last resort used by the BLM.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Zarrello	Dana	The Cloud Foundation		1337	2	Subpart 4110 - Qualifications and Preference	Proposal: Establish a regulation that brings grazing regulations into conformance with the 1971 Wild Free-Roaming Horses and Burros Act and devote AUMs or forage within Herd Areas principally but not necessarily exclusively to wild horses and burros. To satisfy this requirement livestock grazing within Herd Areas (including zeroed-out HAs and HMAs) should not exceed 45% of all forage allocations and wild horses and burros should be at least 55% or more of all forage allocations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	Tony		ID	1088	4	Subpart 4110 - Qualifications and Preference	Only if a land use plan deems that AUMs are no longer available for livestock grazing should the AO be able to make a decision based on long term monitoring data that said AUMs could not be returned to active use for livestock grazing. It does not cost the BLM anything to keep track and accurate record of suspended AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	20	Subpart 4110 - Qualifications and Preference	No reasoned, responsible determination about allowed AUMs can be made without first determining the current environmental health of the land on which allotments are located. If such grazing threatens or jeopardizes TNEB on the public lands, then AUMs should be reduced or permits retired in order to maintain or restore rangeland health. At a minimum, in NEPA documents, the BLM must require that numbers of livestock and seasons of use, as well as AUMs, be prescribed for the given area. See 43 C.F.R. § 4130.3-1(a); see also Nat. Res. Defense Counc. v. Hodel, 618 F. Supp. 848, 869-70 (E.D. Cal. 1985). To make a reasoned determination in this regard, detailed current rangeland conditions must be disclosed as described above.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Pfister	Don	Calf Creek Cattle Company, LLC	MT	1421	1	Subpart 4110 - Qualifications and Preference	During the lodge pole fire my ranch totally burned except the ranch buildings. The following year I would estimate we lost approximately 35-40% of the timber and approximately 80% of the sage. Since then the Native grasses came back thicker than ever. There are also seasonal springs and creeks that now run all year. I would be interested in increasing AUMs. Using the grazing practices of the past we are not getting the grasses grazed down enough leaving fire hazards.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miller	Stephen J.	Miller Land Co., Inc.	AZ	1484	1	Subpart 4110 - Qualifications and Preference	Courts have held the issue that AUMs associated with the base property are in fact property right of the landowner. When suspension or cancellation occurs there is no compensation to the base property owner. This is why suspended AUMs should always be identified in a permit decision, and thus tracked for the record. The term "suspension" carries with it a presumption that use could be sometime in the future be regained.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	19	Subpart 4110 - Qualifications and Preference	4110.3-2 Decreasing permitted use - Any reductions in permitted use must be preceded by an EIS to inform the deciding officer of the environmental impact of the reduction in use, particularly the increased potential for wildfires and subsequent loss of habitat for wildlife, including endangered species, as well as negative impacts on local economies, recreation, rangeland resources, watersheds and water quality.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Flores	Barbara		CO	1280	1	Subpart 4110 - Qualifications and Preference	4. Finally, the public would like to see an overall reduction in the number of AUMs and acres allocated to private livestock grazing and removal of all private livestock from areas where they are causing damage to the land, plants, wildlife and riparian areas, particularly on the 26,900,000 acres of BLM lands that have wild horses and/or burros. These areas are only a fraction of the herd areas where wild horses and burros were to be protected according to the 1971 Act, and are only 17% of the BLM land allocated for private livestock grazing. That 17% used by wild horses and/or burros is decreasing yearly and most areas are shared with private livestock, which are allocated the huge majority of the available forage.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlson	Kenneth	Moreau Grazing Assn (MGA)	SD	1470	1	Subpart 4110 - Qualifications and Preference	To determine what percentage of an AUM they are BLM should be following a nationally recognized, scientifically based method to determine livestock AUMs.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Katlyn	Nevada State Grazing Board N2	NV	1174	3	Subpart 4110 - Qualifications and Preference	Regarding altered land management practices, the Board strongly suggests that AUM reductions be the last resort used by the BLM. Reducing AUMs on an allotment may be a simple short-term solution for the BLM regarding allotment concerns, but the Board strongly feels that this is not a sustainable strategy for the environment, wildlife, livestock or the affected permittee(s). This strategy has continuously proved to be subjective due to the qualitative nature of this management practice, while also rarely being effective. The Board acknowledges this has been the typical solution for nearly three decades and feels that it is not an acceptable technique for the health of public lands. Grazing reductions on an allotment lead to an increase in fire hazards by allowing vegetation to cure longer than it should, which then creates a wolfy landscape that's perfect for disastrous wildfires. This then contributes to the spread of invasive species, such as cheatgrass, and provides an environment for pinyon-juniper encroachment that directly works against the nation-wide effort by multiple stakeholders to increase greater sage-grouse habitat. Reducing AUMs also does not address the rapidly growing population of feral horses that remain on allotments and degrade key areas across Nevada. The Board asks that flexible, adaptive management practices be the first step in addressing the BLM's concerns with an allotment instead of AUM reductions. This type of management should be in collaboration with the permittee(s) and utilize their observations of the landscape, since they are usually on the allotment more than anyone else. The Board strongly feels that using permittee observations and the best available quantitative science, as opposed to qualitative methods, will lead to more appropriate management practices than those currently used. This update should also recognize that science is an evolving field and that any management practices should be reviewed annually to ensure the specific needs and management goals of an allotment are being met. It should be noted that such goals should perpetuate new appropriate objectives, further cooperative activities between the BLM and the permittee(s) and increase the incentive for positive livestock management on public lands. Before resorting to AUM reductions, appropriate steps should be taken by the BLM to ensure that it is, in fact, livestock grazing that is causing any issues on the allotment. This should include observing any wild horse damages, flooding or drought conditions, wildfire impacts and any other circumstances that commonly put the health of the allotment at risk. If any of these conditions are found to be the source of negative allotment conditions, livestock grazing should be managed appropriately to help mitigate any impacts. The Board strongly requests that the BLM use livestock grazing as a tool for managers to use, instead of the often-unfounded source for
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	21	Subpart 4110 - Qualifications and Preference	Permit and Lease Transfers, allow issuance of renewals that only change ownership name without the need to issue a decision or create a subsequent appeal process. o If a grazing permit transferred to a new owner's name remains subject to the terms and conditions that were previously in effect, it is essentially being processed pursuant to section 402(c) of FLPMA. Thus, consider regulations for automatic renewal of such permits without the need to issue a decision or create a subsequent appeal process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	17	Subpart 4110 - Qualifications and Preference	Applicants must be in the livestock business, this has been a criteria since the enactment of the Taylor Grazing Act in 1934. We are not aware of ANY language from Congress that has conveyed an opinion that BLM permittees or lessees should not be required to be in the livestock business. Applicants who are not in the livestock business do not intend to stock a BLM permit or lease with livestock. Proper livestock grazing is supported by peer-reviewed science-based research and literature to be one of the only ways to maintain the health of Western rangelands and is a contributor to productive grouse and other wildlife habitats.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	16	Subpart 4110 - Qualifications and Preference	The regulations should ensure that any long-term grazing decision or permit renewal is based on long-term (not "snapshot" in time), objective quantitative data through valid monitoring protocols, acceptable under current rangeland science standards. Qualitative data is appropriate and should be used for short-term and day-to-day decision making through adaptive management. To assist with monitoring and data collection for both short-term and long-term grazing decision making, BLM should memorialize in the regulations Cooperative Monitoring, as outlined in the MOU with Public Lands Council.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	1	Subpart 4110 - Qualifications and Preference	Quantitative Monitoring: We have a comprehensive cooperative monitoring program on our ranch. We work with BLM so that we can use data to better manage our cattle and our resources. BLM has been hampered by current regulations when they try to do the right thing. We support improvements to the regulations so that we can better work together and use quantitative data collected cooperatively to manage our allotments. Quantitative monitoring efforts should be allotment specific and based on objectives. Monitoring should use current rangeland science, identify soil components, use Ecological Site concepts, and State and Transition Models and Disturbance Response Groups. The regulations should make it simple for BLM to use quality data and difficult to ignore it.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	19	Subpart 4110 - Qualifications and Preference	Quantitative monitoring efforts should be tailored to address allotment specific objectives that are impacted by grazing activities. As appropriate, such monitoring should be based on current rangeland science that recognizes the value of identifying soil components and using Ecological Site concepts and their associated State and Transition Models and Disturbance Response Groups or broader Great Groups.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	2	Subpart 4110 - Qualifications and Preference	Quantitative monitoring efforts should be tailored to address allotment specific objectives that are impacted by grazing activities. As appropriate, such monitoring should be based on current rangeland science that recognizes the value of identifying soil components and using Ecological Site concepts and their associated State and Transition Models and Disturbance Response Groups or broader Great Groups.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	Tony		ID	1088	1	Subpart 4110 - Qualifications and Preference	monitoring must consider not only the site, but the ecological potential of the site with all its factors. Guessing or a one size fits all approach must be avoided as it has unintended ecological impacts to the rangeland, and also has significant economic impacts and implications to us as permittees. We feel it is imperative to use quantitative data when determining management actions and the impacts and effects those actions could have. It is also imperative to use quantitative data in order to truly determine the effectiveness of any actions. This also allows the actions to be compared and show clarity and defensibility over time.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	14	Subpart 4110 - Qualifications and Preference	It is crucial for the regulations to mandate reliance on current rangeland science -Ecological Site Descriptions (EsD) and their associated State and Transition Models/Disturbance Response Groups to inform objectives and differing levels of grazing allowed. An understanding and description of the ecological shifts or transitions that have occurred due to disturbance, such as wildfire, or legacy management are imperative in order to frame management objectives under any grazing permit.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	36	Subpart 4110 - Qualifications and Preference	BLM AO's make a variety of Decisions in the course of their responsibilities. Some are administrative and have little impact on the recipient. But many grazing decisions have significant economic impact on family ranches and these types of decisions deserve to be made on the basis of science-based monitoring data that will stand the test of scrutiny. We recommend that the BLM develop science-based technical criteria for the quantity and quality of data in monitoring programs used as appropriate for the various types of grazing decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	16	Subpart 4110 - Qualifications and Preference	At present, the BLM is held to no science-based standard with respect to the information that the "authorized officer" can use to make grazing decisions. Science-based data should be the basis for grazing decisions in the future. * The existing narrative after "multiple use and sustained yield" conveys a level of detail for the contents and purpose of the LUP that may be in excess of Congressional intent in the FLPMA, and may also be restrictive on the ability of the current Secretary of Interior to determine the content and purpose of a BLM - LUP.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	11	Subpart 4110 - Qualifications and Preference	We suggest amending § 4110.3-2(b) to read as: * "When monitoring shows grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of the inconsistent use or carrying capacity. Any adverse determination that results in the nonrenewal of a grazing permit/lease only results in the nonrenewal of the grazing permit/lease, and not the cancellation of the preference which shall remain attached to the base property and be available through application and transfer to the new owner or lessee of the base property, or transferred to other qualified base property if the permittee/lessee whose permit/lease was canceled for cause continues to own the original base property." * Additionally, add subsection (c) to read as "Any decrease in active use shall be classified as suspended use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baltzor	Keith		OR	930	1	Subpart 4110 - Qualifications and Preference	I see a critical need for a grazing rule that would require wild horses and burritos to not exceed AML. While I believe horses and burritos are an important part of the multiple use objective, their over population on western rangelands has caused great degradation to range resources. In some cases the animals are subject to starvation and lack of water to to point of suffering and even death. The loss of healthy range ecosystems due to this AMP overage has caused economic hardship to permittees, the business' they support and and the communities in which the live. For these reasons I urge you to consider the implementation of the requested rule.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	9	Subpart 4110 - Qualifications and Preference	To qualify for grazing on public lands, Farm Bureau and CCA believe that it is essential that an entity own or control base property and actually graze livestock on the range to support a livestock business. We suggest amending the qualifications to require engagement in a livestock business. We suggest the following: * (a) Except as provided under §§ 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be...:"

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	10	Subpart 4110 - Qualifications and Preference	BLM's current approach resulting in automatic decreases in Animal Unit Months (AUMs) whenever transfers of grazing allotments take place should be addressed in the proposed regulation. Before an Authorized Officer decreases active use, BLM should be required to give documented, specific, and proven science-based reasons for the actions taken. Also, there should not be any decreases if conditions warrant continued permitted use. If conditions are not acceptable or carrying capacity is exceeded, BLM should first be required to consider modifying management practices and not automatically reduce active AUMs. Such management practices could include rotation, reevaluating the duration of grazing, etc.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Adams	Chase	American Sheep Industry Assn	CO	1031	4	Subpart 4110 - Qualifications and Preference	We would request that Mandatory Qualifications, §4110.1, should reflect that in order to qualify for a grazing use on public lands that an applicant shall own or control land or water base property and be engaged in livestock production and will use those lands for the grazing of livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	41	Subpart 4110 - Qualifications and Preference	Original text: 4100.3-3 Implementation of reductions in permitted use. Proposed text: 4100.3-3 Implementation of reductions in active use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klein	Tammy	Central Valley and Penasco Soil and Water Conservation Districts	NM	1144	7	Subpart 4110 - Qualifications and Preference	There is no legal basis for those who are not in the livestock business to qualify for a grazing permit or lease.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ball	Robert		CO	722	1	Subpart 4110 - Qualifications and Preference	On May 15, 2000, the Supreme Court of the United States issued their decision in Public Lands Council, etal v. Bruce Babbitt, Secretary of the Interior, etal; Case Number 98-1991. They ruled: "Ultimately it is both the Taylor act and the regulations promulgated thereunder that constrain the Secretary's discretion in issuing permits, The statute continues to limit the Secretary's authorization to issue permits to "bona fide settlers, residents and other stock owners" 43 U.S.C. @315b." The mandatory qualifications subsection of the grazing regulations (4110.1) must be revised to incorporate this directly relevant decision from the US Supreme Court. BLM has ignored this mandatory minimum requirment to hold a grazing permit for almost 20 years. As a result many non "[live]stock owners", have been issued BLM grazing permits. Examples include non-livestock owning branches of state governments (game and fish agencies, etc.), wild horse advocacy groups, as well as many others. A search of your automated grazing permit data base would quickly reveal the scope of this problem; with many more to be discovered if you would inspect each permittee case file. When scoped in an EIS, the mandatory requirment should tie the kind of livestock permitted (cattle, sheep, etc.) to the kind of livestock documented to be owned. Obviously the ownership of horses alone could not be used to qualify for a cattle or sheep grazing permit. The minimum numbers of livestock owned should also be address, for example a minimum of 50% of the permitted numbers, or some other figure. State livestock brand inspection paperwork would be one way to document ownership of livestock. This is inconveient, but BLM cannot continue to ignore this decsion by the US Supreme Court.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Correll	Leanne	SER Conservation District	WY	1066	4	Subpart 4110 - Qualifications and Preference	The Taylor Grazing Act, the Public Rangelands Improvement Act, and the establishment of actual grazing districts across the landscape speak to the original intent of Congress to ensure our nation's public lands were to incorporate livestock grazing as a primary use, and that to qualify for grazing on public lands, an entity must own or control land or water as base property and actually graze livestock on the range as a bona fide livestock business. Therefore, the mandatory qualifications to hold a BLM grazing permit should include a requirement to be engaged in the livestock business. The Mandatory Qualifications 4110.1 (a) should be reworded to include the new italicized language as follows : "...to qualify for grazing use on the public lands an applicant must own or control land or water base property, must be engaged in a business that produces livestock, must use the public land permit to graze livestock, and must...
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kershner	Bryce		OR	1047	1	Subpart 4110 - Qualifications and Preference	When there are conflicting applications for livestock grazing use, the current regulations allow the authorized officer to consider whether an applicant allows “public ingress or egress across privately owned or controlled land to public lands.” 43 C.F.R. § 4110.1-2(d). An applicant who does not allow public access across their own private land should not be penalized for not providing the general public access over its private land. Allowing public access across private land should not be a criteria for who may or may not obtain approval of an application for grazing use. Therefore, delete 43 C.F.R. § 4110.1-2(d) which provides as a factor “public ingress or egress across privately owned or controlled land to public lands

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	37	Subpart 4110 - Qualifications and Preference	When monitoring trends show grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the domestic livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of excess grazing documented by quantitative monitoring.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goetz	Katie	New Mexico Department of Agriculture		1115	7	Subpart 4110 - Qualifications and Preference	What quantitative data will qualify as "monitoring or field observations" under 4110.3-2 (b)? With what frequency and over what period of time will such data be considered?
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goetz	Katie	New Mexico Department of Agriculture		1115	8	Subpart 4110 - Qualifications and Preference	What quantitative data will qualify as "monitoring or field observations" under 4110.3-2 (b)? With what frequency and over what period of time will such data be considered?
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	10	Subpart 4110 - Qualifications and Preference	We encourage the BLM to consider use of advanced remote-sensed products in an appropriate way to streamline decision-making while improving accountability. One way to advance these products in regulations could include adjusting §4110.3(b), by explicitly calling out the use of "appropriate remote-sensed data" as an acceptable way to support condition assessment and determine whether changes to grazing management are warranted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	19	Subpart 4110 - Qualifications and Preference	We are recommending that language be added to 4110.3, "Changes in grazing status" to now read as follows to accommodate the concerns stated in the above paragraph: "The authorized officer shall periodically review the level of active use specified in a grazing permit/lease and may make changes to the terms and conditions as needed to accomplish allotment objectives. The AO shall first determine if livestock grazing is the causal factor for not achieving allotment objectives. If the current livestock grazing program is determined to be the causal factor, the AO shall first implement changes in the management program to include, but are not limited to, changes in seasons of use, duration and timing of use, or rangeland improvements to accomplish a trend towards achieving allotment objectives before reducing active AUM's. Any reductions in active use will be placed in suspension."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	20	Subpart 4110 - Qualifications and Preference	Use of Ecological Site Descriptions (ESD) should not be part of decision making because they are inaccurate and incomplete in development and untested. These ESDs are continually being updated and changed, therefore decisions and management changes should not be based on this incomplete information.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	21	Subpart 4110 - Qualifications and Preference	The regulations should include clarification that if a permitted use for a grazing permit is to be reduced due to another permitted multiple use, such as mining, any reduction would be based on field work and monitoring to quantify the actual forage lost. Not some simple math exercise as we have often seen occur (e.g., simply dividing total AUMs across an allotment into the acreage lost to grazing due to mining disturbance).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	15	Subpart 4110 - Qualifications and Preference	The regulations should include clarification that if a permitted use for a grazing permit is to be reduced due to another permitted mUltiple use, mainly mining, any reduction would be based on field work and monitoring to quantify the actual forage lost. Not some simple math exercise as we have often seen occur (e.g., simply dividing total AUMs across an allotment into the acreage lost to grazing due to mining disturbance).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Casey		NV	748	3	Subpart 4110 - Qualifications and Preference	The regulations should include clarification that if a permitted use for a grazing permit is to be reduced due to another permitted multiple use, mainly mining, any reduction would be based on field work and monitoring to quantify the actual forage lost. Not some simple math exercise as we have often seen occur (e.g., simply dividing total AUMs across an allotment into the acreage lost to grazing due to mining disturbance). The regulations should include wholesale changes from "permittee" to "preference holder." This would return to the intent of the Taylor Grazing Act and true grazing preference. The regulations should ensure that base property requirements, land and/or water, are retained. But, it should be clarified that base property is to support a ranching operation when livestock are not grazing BLM-administered land but is not required to fully sustain, on its own, the ranching operation (e.g., a ranch buys and feeds hay to fully sustain the herd when not grazing under the permit).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	16	Subpart 4110 - Qualifications and Preference	The regulations should ensure that every feasible option is pursued before any restrictive actions is taken against grazing. Before imposing grazing restrictions or seeking changes in livestock stocking rates or seasons of permitted use, identify and implement all economically and technically feasible livestock distribution, forage production enhancement, weed control programs, prescribed grazing systems, off-site water development by the water rights holder, shrub and pinyon/juniper control, livestock salting/supplementing plans, and establishment of riparian pastures and herding
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	24	Subpart 4110 - Qualifications and Preference	The regulations should ensure that base property requirements, land and/or water, are retained. But, it should be clarified that base property is to support a ranching operation when livestock are not grazing BLM-administered land but is not required to fully sustain, on its own, the ranching operation (e.g., a ranch buys and feeds hay to fully sustain the herd when not grazing under the permit).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	34	Subpart 4110 - Qualifications and Preference	The regulations should be amended to require that a permittee must be actively engaged in the livestock business and intend to use the permitted allotments to graze livestock: "§ 4110.1 Mandatory Qualifications. (a) Except as provided under §§ 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be..."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	23	Subpart 4110 - Qualifications and Preference	The grazing regulations should specify that whenever livestock grazing is reduced due to implementation of a conflicting use (mining, habitat improvement, etc.) the grazing reduction will be quantified based upon a determination of the actual reduction in the livestock carrying capacity due to the change in use based upon quantitative monitoring.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	4	Subpart 4110 - Qualifications and Preference	The grazing regulations should specify that whenever livestock grazing is reduced due to implementation of a conflicting use (mining, habitat improvement, etc.) the grazing reduction will be quantified based upon a determination of the actual reduction in the livestock carrying capacity due to the change in use based upon quantitative monitoring.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	35	Subpart 4110 - Qualifications and Preference	The grazing regulations should not obligate, nor imply, that BLM must impose automatic decreases in AUMs. Instead, Active use should be reduced only if other management practices (rotation, duration of deferment, improvement of distribution) do not work. Reduction of active use AUMs should only occur after modification of management practices fails to provide a solution and should only reduce AUMS to a level necessary to meet objectives with the implementation of the new practices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	12	Subpart 4110 - Qualifications and Preference	The grazing regulations should not obligate, nor imply, that BLM must impose automatic decreases in AUMs. Instead, Active use should be reduced only if other management practices (rotation, duration of deferment, improvement of distribution) do not work. Reduction of active use AUMs should only occur after modification of management practices fails to provide a solution and should only reduce AUMS to a level necessary to meet objectives with the implementation of the new practices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Shuman	Todd	Sierra Club Grazing Team	CA	1297	1	Subpart 4110 - Qualifications and Preference	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.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Quartuccio	Jacob		VA	769	1	Subpart 4110 - Qualifications and Preference	The BLM needs to retire permits and do everything in their power to reduce the amount of grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burton	David		UT	1057	4	Subpart 4110 - Qualifications and Preference	Suspended AUMs need to be reinstated if the range warrants increased carrying capacity.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	14	Subpart 4110 - Qualifications and Preference	Section 4110.3-2(b): The following statement " an unacceptable level or pattern of utilization or when use exceeds the livestock carrying capacity the authorized officer shall reduce permitted grazing" has the potential to create problems. There needs to be recognition that all of the methods described in this section essentially use a 50% utilization level as the criteria for determining carrying capacity. That utilization level may be appropriate as a growing season tool and/or for rangeland without widespread and abundant invasive annual grasses. When desired grasses are dormant carrying capacity (from a forage perspective) is much different than during the active growing period, especially around the boot growth stage. If targeted or outcome-based grazing is to be successful for controlling annual grasses and managing fuels, the regulations need to recognize that carrying capacity and utilization levels must vary by the growth stage of desired grasses and how stock may select species (e.g., willows) other than the desired, but dormant herbaceous species. The point is that past approaches may not fit the current situation, and every situation is different; thus, a one-size fits all approach will not work.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	12	Subpart 4110 - Qualifications and Preference	Section 4110.3. The worded "needed" in line 5 should be changed to "as appropriate". As currently worded in this entire sentence, there is an implication (perhaps unintended, but one hard to work around) that change in permitted use is downward, not upward. There needs to belanguage that readily directs management to permit increases in AUMs harvested, when appropriate (i.e., water can't be a limiting factor for stock numbers) post-fire. Upwards of two million acres in Nevada, at mid and upper elevations, has burned and become excellent stands of perennial bunchgrasses. These bunchgrasses drive most ecological processes for vegetation change, including the slow to non-existent establishment of sagebrush and other desired shrubs. Perennial herbaceous production has increased dramatically and fuel continuity in many situations is similar to areas with abundant cheatgrass. Some of these perennial grassland areas have now burned a second time, eliminating the few young shrubs that were becoming established. In these situations, maintaining the same AUM levels post-fire, as pre-fire does address changes in management conditions and allow for better fuels management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	16	Subpart 4110 - Qualifications and Preference	Require the use of the best available science in livestock grazing decision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chew	Scott H.	Chew Livestock, Inc	UT	1491	4	Subpart 4110 - Qualifications and Preference	Reductions in grazing preference due to horses; No permittee should lose any amount of preference due to wild hqrses
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon			1227	4	Subpart 4110 - Qualifications and Preference	Reductions in grazing preference due to horses; No permittee should lose any amount of preference due to wild horses.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	15	Subpart 4110 - Qualifications and Preference	recommend deletion of 43 C.F.R. § 4110.1-2(d) which provides as a factor "public ingress or egress across privately owned or controlled land to public lands."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hess	Carie	Petroleum County Conservation District	MT	1146	5	Subpart 4110 - Qualifications and Preference	Recognize statutory preference extended to those engaged in the livestock industry.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bailey	Ray & Jacqueline		NV	863	2	Subpart 4110 - Qualifications and Preference	Rancher's need to receive there "Temporary Suspended AUM's" that were suspended in the 1960's. They were to be given back when the range improved. The allotments have been fenced, reseeded after wildland fires, but no changes have been made to the AUM numbers.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rimmer	Karen		WY	1345	1	Subpart 4110 - Qualifications and Preference	Preference of Grazing Preference - BLM should redefine "preference" or "grazing preference" to include both a priority position for renewal of a grazing permit and the level of AUMs that were established in the permit
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	28	Subpart 4110 - Qualifications and Preference	Preference AUM's have been legally adjudicated to qualified private base property and specifically authorized by Congress in the TGA. BLM can cancel a grazing permit for cause, but the legal adjudication of Preference AUM's to qualified base property becomes one of the sticks in the bundle of economic values to the ranch and the disposition of Preference AUM's is NOT inexorably tied to the status of a grazing permit/lease. Preference AUM's are a covenant to the private base property. An applicant has to own a Preference to qualify for a grazing permit/lease, but the owner of the base property to which this Preference is attached is not required by federal law to activate this Preference unless they want to apply for a BLM grazing permit/lease. "Permit value" is based on the number of Preference AUM's attached to that ranch. If BLM can cancel Preference AUM's, then the western family ranches will have lost a BIG part of the stability to these ranches dependent on economic access to BLM grazing permits. The TGA, the FLPMA, and the PRIA ALL say that "stability of the livestock industry", is a goal.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	12	Subpart 4110 - Qualifications and Preference	Preference AUM's have been legally adjudicated to qualified private base property and specifically authorized by Congress in the TGA. BLM can cancel a grazing permit for cause, but the legal adjudication of Preference AUM's to qualified base property becomes one of the sticks in the bundle of economic values to the ranch and the disposition of Preference AU M's is NOT inexorably tied to the status of a grazing permit/lease. Preference AUM's are a covenant to the private base property. An applicant has to own a Preference to qualify for a grazing permit/lease, but the owner of the base property to which this Preference is attached is not required by federal law to activate this Preference unless they want to apply for a BLM grazing permit/lease. "Permit value" is based on the number of Preference AUM's attached to that ranch. If BLM can cancel Preference AUM's, then the western family ranches will have lost a BIG part of the stability to these ranches dependent on economic access to BLM grazing permits. The TGA, the FLPMA, and the PRIA ALL say that "stability of the livestock industry", is a goal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lee	Don L. (Bebo)	New Mexico Federal Lands Council	NM	1366	2	Subpart 4110 - Qualifications and Preference	Preference AUM's have been legally adjudicated to qualified private base property and specifically authorized by Congress in the Taylor Grazing Act (TGA). BLM can cancel a grazing permit for cause, but the legal adjudication of Preference AUM's to qualified base property becomes one of the sticks in the bundle of economic values to the ranch and the disposition of Preference AUM's is NOT inexorably tied to the status of a grazing permit/lease. Preference AUM's are a covenant to the private base property. An applicant has to own a Preference to qualify for a grazing permit/lease, but the owner of the base property to which this Preference is attached is not required by federal law to activate this Preference unless they want to apply for a BLM grazing permit/lease. "Permit value" is based on the number of Preference AUM's attached to that ranch. If BLM can cancel Preference AUM's, then the western family ranches will have lost a BIG part of the stability to these ranches dependent on economic access to BLM grazing permits. The TGA, the FLPMA, and the PRIA ALL say that "stability of the livestock industry", is a goal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1079	2	Subpart 4110 - Qualifications and Preference	Preference AUM’s have been legally adjudicated to qualified private base property and specifically authorized by Congress in the TGA. BLM can cancel a grazing permit for cause, but the legal adjudication of Preference AUM’s to qualified base property becomes one of the sticks in the bundle of economic values to the ranch and the disposition of Preference AUM’s is NOT inexorably tied to the status of a grazing permit/lease. Preference AUM’s are a covenant to the private base property. An applicant has to own a Preference to qualify for a grazing permit/lease, but the owner of the base property to which this Preference is attached is not required by federal law to activate this Preference unless they want to apply for a BLM grazing permit/lease. “Permit value” is based on the number of Preference AUM’s attached to that ranch. If BLM can cancel Preference AUM’s, then the western family ranches will have lost a BIG part of the stability to these ranches dependent on economic access to BLM grazing permits. The TGA, the FLPMA, and the PRIA ALL say that “stability of the livestock industry”, is a goal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	34	Subpart 4110 - Qualifications and Preference	No grazing reduces the amount of money paid to the state and federal governments for the authorized use of BLM allotments. The federal courts have ruled that it is illegal for the BLM to issue a grazing permit to NOT graze livestock which was Babbitt's conservation use idea. Since that ruling by the federal court, there is no logic or legal basis for those who are not in the livestock business to qualify for a grazing permit or lease.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kershner	Bryce		OR	1043	1	Subpart 4110 - Qualifications and Preference	It is important, given the purpose of the Taylor Grazing Act the establishment of grazing districts, and the Public Rangelands Improvement Act, that to qualify for grazing on public lands, the entity must own or control base property and actually graze livestock on the range to support a livestock business. Therefore, change the description of mandatory qualifications to include been engaged in the livestock business: "§4110.1 Mandatory Qualifications. Except as provided under §§4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be...."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	13	Subpart 4110 - Qualifications and Preference	It is critical, given the purpose underlying the Taylor Grazing Act and the Public Rangelands Improvement Act to authorize livestock grazing on public lands, that those who qualify for grazing public lands (1) actually own or control base property and (2) actually graze livestock on the range to support a livestock business. There has been abuse of the system in this area by self-style conservation groups. As such, §4110.1 {mandatory qualifications) should be amended to read: "(a) Except as provided under §§4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be ..."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Myrin	Nils		UT	1104	1	Subpart 4110 - Qualifications and Preference	If producers need to make cuts in aums for drought they need to have reassurance the cuts won't be permanent. In some situations, temporary voluntary reduction in numbers to improve ground cover would lead to greater production long term. Increasing aums if the forage is available should be a long term possibility for producers which would give them incentives to do improvement projects. To accomplish this, project approvals through NEPA need to be done in a timely manner.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spratling	Craig	N-1 Grazing Board Nevada	NV	807	1	Subpart 4110 - Qualifications and Preference	I would like to voice my continued support for Grazing Preference and Base Property requirements for all grazing permits. These two items are essential to the stability of the ranches depending on the use of federal lands grazing in their operations. Thank you for the opportunity to voice my concern on the section.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goodwin	Jay	BLM Caliente Field Office		1154	2	Subpart 4110 - Qualifications and Preference	I have the unusual situation of a permittee voluntarily relinquishing their preference/grazing permit on an allotment, rather than selling it to another operator. This has led to the realization that the CFRs (4100) do not address relinquishing preference. There is an IM from 2013, #184, that provides guidance for processing a relinquishment. So a second suggestion for revisions of the CFRs is add relinquishment to Section 4110. The IB cites 4110 in disposition of the AUMs, but reading 4110 does not help me in figuring out what to do with the relinquished preference.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kovalcik	Nicholas		WA	679	1	Subpart 4110 - Qualifications and Preference	I am writing today to ask that you allow grazing permits on public land to expire and retire them out right.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	11	Subpart 4110 - Qualifications and Preference	he BLM should address and implement protection to grazing permits that are waived without preference When a permittee retires their operation without someone specific to whom they pass the permit, the allotments within that permit should remain open to grazing. The BLM should implement regulations that protect the right of livestock grazing on public lands
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	22	Subpart 4110 - Qualifications and Preference	Existing restrictions on the use and placement of nutritional supplements on public grazing lands should also be revised. Supplementation with products that are currently restricted and/or in locations that are currently prohibited will often be necessary or beneficial to successfully implement targeted grazing and outcome based grazing projects or other prescriptive grazing programs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	24	Subpart 4110 - Qualifications and Preference	Existing restrictions on the use and placement of nutritional supplements on public grazing lands should also be revised. Supplementation with products that are currently restricted and/or in locations that are currently prohibited will often be necessary or beneficial to successfully implement targeted grazing and outcome based grazing projects or other prescriptive grazing programs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	3	Subpart 4110 - Qualifications and Preference	Conflicting Uses: We have mines surrounding our ranch. Sometimes they are great partners, sometimes they are not. The regulations should be changed so that expansion of a mine does not automatically create a reduction in grazing preference. If data show that forage is available on the remaining acres, preference should not be reduced. Working with mines can provide opportunity for more and better range improvements, which increase carrying capacity rather than reduce it.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lanham	Miteshell	Lander County, NV	NV	1219	5	Subpart 4110 - Qualifications and Preference	Clarification should be made that if a permitted use for a grazing permit is to be reduced due to another permitted multiple use, mainly mining, any reduction would be based on field work and monitoring to quantify the actual forage lost.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	12	Subpart 4110 - Qualifications and Preference	BLM should ensure that grazing permits not be retired or given a non-use classification when the land is capable of sustainably authorizing livestock grazing and resulting in meeting or moving toward rangeland health conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	25	Subpart 4110 - Qualifications and Preference	BLM lacks a systematic way to identify lands available or suitable for grazing that meet ecological criteria, grazing capability factors, and legal standards. The Forest Service requires that areas available for grazing produce a minimum amount of forage. BLM has no such minimum. The new regulations should call for one to be established. There are a number of requirements that require BLM to limit grazing to amounts that ensure wildlife needs are meet, productivity is unimpaired over the long term, and impacted habitat is restored. Lands suitable and available for livestock grazing should have a process defined in the regulations.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	24	Subpart 4110 - Qualifications and Preference	At 4110.3-2, Decreasing "permitted use": Please change the Title in this Section to "Decreasing active use". The WSGB comments that the Regulations at this section should be returned to the language that existed prior to RR reform 94 because the language in the BLM Grazing regulations before 2/22/95 more closely represented the range science state of the art positions on this subject. Reductions in active use must be based on science-based monitoring of whether or not allotment measurable objectives are being accomplished, over time. The WSGB also comments that the reference to Section 4180 should be removed from the BLM Grazing regulation at 4110.3-2 and at all other places in these Regulations. (See the WSGB comment at Section 4180)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	33	Subpart 4110 - Qualifications and Preference	Applicants must be in the livestock business, this has been a criteria since the enactment of the Taylor Grazing Act in 1934. We are not aware of ANY language from Congress that has conveyed an opinion that BLM permittees or lessees should not be required to be in the livestock business. Applicants who are not in the livestock business do not intend to stock a BLM permit or lease with livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	45	Subpart 4110 - Qualifications and Preference	Adjudicated AUM's in active use that could be canceled under this part are still in the carrying capacity of the allotment and they should become available to other qualified applicants to purchase from the BLM. This part of the Regulations should not be used to lower the amount of money received by the BLM for AUM's that, while no longer available to the permittee from whom they were canceled, remain a part of the carrying capacity
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	909	11	Subpart 4110 - Qualifications and Preference	Adjudicated AUM's in active use that could be canceled under this part are still in the carrying capacity of the allotment and they should become available to other qualified applicants to purchase from the BLM. This part of the Regulations should not be used to lower the amount of money received by the BLM for AUM's that, while no longer available to the permittee from whom they were canceled, remain a part of the carrying capacity
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1079	12	Subpart 4110 - Qualifications and Preference	Adjudicated AUM's in active use that could be canceled under this part are still in the carrying capacity of the allotment and they should become available to other qualified applicants to purchase from the BLM. This part of the Regulations should not be used to lower the amount of money received by the BLM for AUM's that, while no longer available to the permittee from whom they were canceled, remain a part of the carrying capacity
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallwood	Lori	Big Horn County Commissioners	WY	1223	5	Subpart 4110 - Qualifications and Preference	Additionally, when BLM determines that a reduction in AUMs is necessary, the AUMs should be suspended, not permanently reduced.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	39	Subpart 4110 - Qualifications and Preference	4110.4 Changes in public land acreage. OLD TEXT: § 4110.4-1 Additional land acreage. (a) When lands outside designated allotments become available for livestock grazing under the administration of the Bureau of Land Management, the forage available for livestock shall be made available to qualified applicants. at the discretion of the authorized officer. Grazing use shall be apportioned under § 4130.1-2 of this title. NEW TEXT: (a) When lands outside designated allotments become available for livestock grazing under the administration of the Bureau of Land Management, the forage available for livestock shall be made available to qualified applicants. Grazing use shall be apportioned under § 4130.1-2 of this title. (b) When lands inside designated allotments become available for livestock grazing under the administration of the Bureau of Land Management, the forage available for livestock shall be made available to the permittee(s) or lessee(s) grazing the allotment. Grazing use shall be apportioned 4130.1-2 of this title to the extent there is more than one permittee or lessee in the application. RATIONALE: Comment: This is a situation where preference comes into play.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kershner	Bryce		OR	1042	1	Subpart 4110 - Qualifications and Preference	"Grazing preference or preference means the total number of animal unit months on public lands apporoned and aached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference include active use and use held in suspension. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease.The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans." (Note here that "Preference" should also be added to Section 4130.2 - addressing grazing permits or leases)

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329		Subpart 4110 - Qualifications and Preference	Where lands have been acquired by the Bureau of Land Management through purchase, exchange, gift, or Congress or Executive Order, and an agreement or the terms of the act or Executive Order provide that the Bureau of Land Management shall honor existing grazing permits or leases, such permits or leases are governed by the terms and conditions in effect at the time of acquisition by the Bureau of Land Management, and are not subject to the requirements of § 4110.1. [60 FR 9962, Feb. 22, 1995] § 4110.2 Grazing preference. § 4110.2-1 Base property. (a) The authorized officer shall find land or water owned or controlled by an applicant to be base property (see § 4100.0 5) if: (1) It is capable of serving as a base of operation for livestock use of public lands within a grazing district; or (2) It is contiguous land, or, when no applicant owns or controls contiguous land, noncontiguous land that is capable of being used in conjunction with a livestock operation which would utilize public lands outside a grazing district. (b) After appropriate consultation, cooperation, and coordination, the authorized officer shall specify the length of time for which land base property shall be capable of supporting authorized livestock during the year, relative to the multiple use management objective of the public lands. (c) An applicant shall provide a legal description, or plat, of the base property and shall certify to the authorized officer that this base property meets the requirements under paragraphs (a) and (b) of this section. A permittee's or lessee's interest in water previously recognized as base property on public land shall be deemed sufficient in meeting the requirement that the applicant control base property. Where such waters become unusable and are replaced by newly constructed or reconstructed water developments that are the subject of a range improvement permit or cooperative range improvement agreement, the permittee's or lessee's interest in the replacement water shall be deemed sufficient in meeting the requirement that the applicant control base property. (d) If a permittee or lessee loses ownership or control of all or part of his/her base property, the permit or lease, to the extent it was based upon such lost property, shall terminate immediately without further notice from the authorized officer. However, if, prior to losing ownership or control of the base property, the permittee or lessee requests, in writing, that the permit or lease be extended to the end of the grazing season or grazing year, the termination date may be extended as determined by the authorized officer after consultation with the new owner. When a permit or lease terminates because of a loss of ownership or control of a base property, the grazing preference shall remain with the base property and be available through application and transfer procedures at 43 CFR 4110.2-3, to the new owner or person in control of that base property. (e) Applicants who own or control
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169		Subpart 4110 - Qualifications and Preference	The WSGB justification for this comment is that the level of preference for each holder of a section 3 grazing permit should be shown in the LUP in order to document this subject in the LUP.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204		Subpart 4110 - Qualifications and Preference	The regulations should specify that increases in permitted use should not be authorized until it has been determined through rangeland health assessments and evaluations or allotment plan monitoring that the allotment is meeting rangeland health standards. This assures that we are not increasing use when the allotment is not achieving rangeland health standards.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	30	Subpart 4110 - Qualifications and Preference	The regulations should make explicit that when "permitted grazing use" is reduced under 43 C.F.R. § 4110.3-2(b), BLM must cancel those AUMs, not place them in suspension. This addition to the regulations would codify BLM's current practice of removing those AUMs from the permit rather than moving them to suspended use. ¹³³ The change is also consistent with BLM's definition of permitted use, which includes suspended use. Because suspended use is a subset of permitted use, moving AUMs from active to suspended does not reduce permitted use as required by the regulation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329	13	Subpart 4110 - Qualifications and Preference	The authorized officer shall periodically review the permitted use specified in a grazing permit or lease and shall make changes in the permitted use as needed to manage, maintain or improve rangeland productivity, to assist in restoring ecosystems to properly functioning condition, to conform with land use plans or activity plans, or to comply with the provisions of subpart 4180 of this part. These changes must be supported by monitoring, field observations, ecological site inventory or other data acceptable to the authorized officer. Rangeland productivity is maintaining or improving the ecosystem. Monitoring(see definition of monitoring), if you have good monitoring and trend data then field observation and ecological site inventory and other data are unnecessary. There is no assurance to the quality or impartiality this data, which allows abuse and arbitrary decisions based on bias or opinion. [60 FR 9963, Feb. 22, 1995]
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	17	Subpart 4110 - Qualifications and Preference	Section 4110.3 Topic Changes in grazing preference Comment/Observation NEPA is mentioned only twice in the guidelines. "(c) Before changing grazing preference, the authorized officer will undertake the appropriate analysis as required by the National Environmental Policy Act of 1969 (NEPA) (42 U.S.C. 4321 et seq.). Under NEPA, the authorized officer will analyze and, if appropriate, document the relevant social, economic, and cultural effects of the proposed action." Action Requested Action: To avoid subsequent analysis, grazing actions that require NEPA should be specified or referenced in the guidelines to provide clarity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ruyle	George	University of Arizona	AZ	913	3	Subpart 4110 - Qualifications and Preference	Revise section 4110.1 to eliminate the requirement for an EA for grazing permit renewal when there is no need or intention to make significant changes in management. There is no need to spend the time and money writing and defending such decisions, and thereby delaying permit renewals, when no significant problems have been identified by monitoring or rangeland health assessments and no significant changes needed for management have been identified. Eliminate the term “conservation use” from the regulations. This term carries the implication that active use is contrary to the concept of conservation, which means “wise use”. The regs contain provisions for reduction or elimination of livestock grazing when range conditions and/or conflicting uses require it (4110.3-2b).Such determinations should be based on scientifically valid monitoring data along with professional judgment by qualified BLM personnel.The permittee may request temporary non-use due to personal reasons for a specified period.If the permittee chooses to take non-use after that period it should be offered to other qualified applicants to graze livestock.It should not be the right of the permittee to decide that the allotment should be permanently destocked or devoted to another use.To allow this, is to allow individuals or groups to set BLM grazing policy.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Vonda		NM	899	4	Subpart 4110 - Qualifications and Preference	Preference, which is defined as a prior right or claim, was legally adjudicated to the surface base property owner in a split estate and is controlled by the owner of said preference. Therefore, neither the Secretary of the Interior nor BLM officials have the legal authority to cancel a preference.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eisenach	Kurt	Wyoming Wild Sheep Foundation		1161	2	Subpart 4110 - Qualifications and Preference	Permit and Lease Transfers The proposed actions are seen as beneficial, issuing permits without decision when only a name change on the permit is required, and requiring 10 year versus a 3 year term. If no significant change in permit conditions is expected or required due to the allotment/parcel meeting land health standards and guidelines, then we would recommend a longer permit period be considered.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	2	Subpart 4110 - Qualifications and Preference	OLD TEXT: 4110.3 Changes in permitted use. 4110.3-1 Increasing permitted use. 4110.3-2 Decreasing permitted use. 4110.3-3 Implementation of reductions in permitted use. COMMENTER'S SUGGESTED NEW TEXT: 4110.3 Changes in active use. 4110.3-1 Increasing active use. 4110.3-2 Decreasing active use. 4110.3-3 Implementation of reductions in active use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	1	Subpart 4110 - Qualifications and Preference	OLD TEXT: 4110.2-2 Specifying permitted use. COMMENTER'S SUGGESTED NEW TEXT: 4110.2-2 Specifying active use. Comment: Active use is the language used to describe AUM's not permitted use. This comment applies to all places where 'permitted use' is contained in this document.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	29	Subpart 4110 - Qualifications and Preference	OLD TEXT: 4110.1 Mandatory qualifications. (a) Except as provided under §§4110.1-1, 4130.5 and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, and must be: NEW TEXT: 4110.1 Mandatory qualifications. (a) Except as provided under §§4110.1-1, 4130.5 and 4130.6-3, to qualify for grazing use on the public lands an applicant must be engaged in the livestock business, must own or control land or water base property, and must be: RATIONALE: Comment: The Taylor Grazing Act of 1934 was specifically for 'stock raising', therefore applicants must own, and intend to graze, livestock.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	36	Subpart 4110 - Qualifications and Preference	OLD TEXT: §4110.3-1 Increasing permitted use (a) Additional forage temporarily available for livestock grazing use, be apportioned on a nonrenewable basis. (b) Additional forage available on a sustained yield basis for livestock grazing use shall first be apportioned in satisfaction of permitted use to the permittee(s) or lessee(s) authorized to graze in the allotment in which the forage is available. (c) After consultation, cooperation, and coordination, with the affected permittees or lessees, and the State having lands or managing resources within the area, and the additional forage on a sustained yield basis available for livestock grazing use, in an allotment may be apportioned to permittees or lessees or other applicants, provided the permittee, lessee, or other applicant is found to be qualified under subpart 4110 of this part. Additional forage shall be apportioned in the following priority: (1) Permittee(s) or lessee(s) in proportion to the contribution or stewardship efforts which resulted in increased forage production; (2) Permittees or lessees in proportion to the amount of their permitted use and (3) Other qualified applicants under Sec. 4130.1-2 of this title. NEW TEXT: §4110.3-1 Increasing active use. Additional forage shall be apportioned to qualified applicants for livestock grazing use consistent with multiple-use management objectives. (a) Additional forage temporarily available for livestock grazing use, including forage which is temporarily available within an allotment because of a change in grazing use under Sec. 4130.1 shall be apportioned on a nonrenewable basis. (b) Additional forage available on a sustained yield basis for livestock grazing use shall first be apportioned in satisfaction of suspended use to the permittee(s) or lessee(s) authorized to graze in the allotment in which the forage is available. (c) After consultation, cooperation, and coordination, with the affected permittees or lessees, the affected counties and the State having lands or managing resources within the area, and the affected interest, additional forage on a sustained yield basis available for livestock grazing use, over and above preference(s) in an allotment, may be apportioned to permittees or lessees or other applicants, provided the permittee, lessee, or other applicant is found to be qualified under subpart 4110 of this part. Additional forage shall be apportioned in the following priority: (1) Permittee(s) or lessee(s) in proportion to the contribution or stewardship efforts which resulted in increased forage production; (2) Permittees or lessees in proportion to the amount of their grazing preference; and (3) Other qualified applicants under Sec. 4130.1-2 of this title. RATIONALE: Comment: Changes have been addressed above.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	32	Subpart 4110 - Qualifications and Preference	OLD TEXT: §4110.2-2 Specifying permitted use (a) Permitted use is granted to holders of grazing preference and shall be specified in all grazing permits or grazing leases. Permitted use shall encompass all authorized use including livestock use, any suspended use, and conservation use, except for permit and leases for designated ephemeral rangelands, or annual rangelands where livestock use is occasionally authorized based upon forage availability. Permitted livestock use shall be based upon the amount of forage available for livestock grazing as established in the land use plan, activity plan or decision of the authorized officer under §4110.3-3, except in the case of designated ephemeral or annual rangelands, a land use plan or activity or activity plan may alternatively prescribe vegetation standards to be met in the use of such rangelands. (b) The permitted use specified shall attach to the base property supporting the grazing permit or grazing lease. (c) The animal unit months of permitted use attached to: (1) The acreage of land base property on a pro rata basis, or (2) Water base property on the basis of livestock forage production within the service area of the water. NEW TEXT: §4110.2-2 Specifying active use. (a) Grazing preference shall be specified in all grazing permits or grazing leases. It shall include active use and suspended use and shall be based upon the amount of forage available or livestock grazing established by the original permit or lease adjudication (b) The grazing preference specified shall attach to the base property supporting the grazing permit or grazing lease. (c) Active use shall be based upon the amount of forage available for livestock grazing, as specified in an activity plan or decision of the authorized officer under 4110.3-3, except in the case of designated ephemeral or annual rangelands, a use plan activity or activity plan may be alternatively prescribe vegetation objectives to be met in the use of such rangelands. RATIONALE: Comment: The grazing preference refers to 'active use' and 'suspended use', not permitted use.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	40	Subpart 4110 - Qualifications and Preference	OLD TEXT: § 4110.4-2 Decrease in land acreage. (a) Where there is a decrease in public land acreage available for livestock grazing within an allotment: (1) Grazing permits or leases may be canceled or modified as appropriate to reflect the changed area of use (2) Permitted use may be canceled in whole or in part. Cancellations determined by the authorized officer to be necessary to protect the public lands will be apportioned by the authorized officer based upon the level of available forage and the magnitude of the change in public land acreage available, or as agreed to among the authorized users and the authorized officer. (b) When public lands are disposed of or devoted to a public purpose which precludes livestock grazing, the permittees and lessees shall be given 2 years' prior notification except in cases of emergency (national defense requirements in time of war, natural disasters, national emergency needs, etc.) before their grazing permit or grazing lease and grazing preference may be canceled. A permittee or lessee may unconditionally waive the 2-year prior notification. Such a waiver shall not prejudice the permittees or lessees right to reasonable compensation for, but not to exceed the fair market value of his or her interest in authorized permanent range improvements located on these public lands (see §4120.3-6). NEW TEXT: § 4110.4-2 Decrease in land acreage. (a) Where there is a decrease in public land acreage available for livestock grazing within an allotment: (1) Grazing permits or leases may be canceled or modified as appropriate to reflect the changed area of use. If the land is permanently decreased with no foreseeable return to grazing, as in a military installation, preference may be cancelled. (2) Active use may be canceled in whole or in part. Reductions determined by the authorized officer to be necessary to protect the public lands will be apportioned by the authorized officer based upon the level of available forage and the magnitude of the change in public land acreage available, or as agreed to among the authorized users and the authorized officer. (b) When public lands are disposed of or devoted to a public purpose which precludes livestock grazing, the permittees and lessees shall be given 2 years' prior notification except in cases of emergency (national defense requirements in time of war, natural disasters, national emergency needs, etc.) before their grazing permit or grazing lease and grazing preference may be canceled. A permittee or lessee may unconditionally waive the 2-year prior notification. Such a waiver shall not prejudice the permittees or lessees right to reasonable compensation for, but not to exceed the fair market value of his or her interest in authorized permanent range improvements located on these public lands (see §4120.3-6). RATIONALE: Comment: For Clarification.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	37	Subpart 4110 - Qualifications and Preference	OLD TEXT: § 4110.3-2 Decreasing permitted use. (a) Permitted use may be suspended in whole or in part on a temporary basis due to drought, fire, or other natural causes, or to facilitate installation, maintenance, or modification of range improvements (b) When monitoring or field observation show grazing use or patterns of use are not consistent with the provisions of subpart 4180, or grazing use is causing an unacceptable level or pattern of utilization or, when use exceeds the livestock carrying capacity as determined through monitoring, ecological site inventory or other acceptable methods, the authorized officer shall reduce permitted grazing use or otherwise modify management practices. NEW TEXT: § 4110.3-2 Decreasing active use (a) Active use may be suspended in whole or in part on a temporary basis due to drought, fire, or other natural causes, or to facilitate installation, maintenance, or modification of range improvements or if there unacceptable level of use when livestock exceed carrying capacity. (b) When monitoring shows that active use may need to be decreased, the authorized officer shall consult with affected permittee(s) or lessee(s), the affected counties, and State to consider a range of actions that will meet resource objectives including the consideration of actions that will have the least negative impact to the affect permittee(s) or lessee(s). RATIONALE: Comment: The permittee or lessee, who have a vested interest, must be included in the discussions and decisions as well as the counties in which the permittee or lessee operates.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	35	Subpart 4110 - Qualifications and Preference	OLD TEXT: § 4110.3 Changes in permitted use. The authorized officer shall periodically review the permitted use specified in a grazing permit or grazing lease and shall make changes in the permitted. as needed to manage, maintain or improve rangeland productivity, to assist in restoring ecosystems to properly function condition, to conform with land use plans or activity plans, or to comply with the provisions of subpart 4180 of this part. These changes must be supported by monitoring, field observations, ecological site inventory or other data acceptable to the authorized officer. NEW TEXT: § 4110.3 Changes in permitted use active use. The authorized officer shall periodically review the permitted active use specified in a grazing permit or grazing lease and shall may make changes in the permitted active use through agreement or decision. These changes must be supported by science based monitoring, unless the change is necessary to manage, maintain or improve rangeland productivity under and emergency situation. RATIONALE: Comment: Active use changes must involve the affected permittee or lessee and decisions must be based on scientific monitoring. Data must be collected in a scientifically defensible manner.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	34	Subpart 4110 - Qualifications and Preference	OLD TEXT: § 4110.2-4 Allotments. After consultation, cooperation, and coordination with the affected grazing permittees or lessees, the State having lands or responsible for managing resources within the area, and the interested public the authorized officer may designate and adjust allotment boundaries The authorized officer may combine or divide allotments, through an agreement or by decision, when necessary for the proper and efficient management of public rangelands. NEW TEXT: § 4110.2-4 Allotments. After consultation, cooperation, and coordination with the affected grazing permittees or lessees, the affected counties, the State having lands or responsible for managing resources within the area, and affected interest, the authorized officer may designate and adjust allotment boundaries through an agreement with the permittee or lessee. RATIONALE: Comment: Counties are just as affected, if not more so, than the states. They must be included in the consultation, cooperation, and coordination phase. The permittee or lessee must be included in any change of their adjudicated allotment boundaries.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	33	Subpart 4110 - Qualifications and Preference	OLD TEXT: (b) If base property is sold or leased, the transferee shall within 90 days of the date of sale or lease file with the authorized officer a properly executed transfer application showing the base property and the amount of permitted use use being transferred in animal unit months. NEW TEXT ["permitted use" changed "active use"]: (b) If base property is sold or leased, the transferee shall within 90 days of the date of sale or lease file with the authorized officer a properly executed transfer application showing the base property and the amount of active use use being transferred in animal unit months. (c) If a grazing preference is being transferred from one base property to another base property, the transferor shall own or control the base property from which the grazing preference is being transferred and file with the authorized officer a properly completed transfer application for approval. If the applicant leases the base property, no transfer will be allowed without the written consent of the owner(s), and any person or entity holding an encumbrance of the base property from which the transfer is to be made. Such consent will not be required where the applicant for such transfer is a lessee without whose livestock operations the grazing preference would not have been established. (d) At the date of approval of a transfer, the existing grazing permit or lease shall terminate automatically and without notice to the extent of the transfer. (e) If an unqualified transferee acquires rights in base property through operation of law or testamentary disposition, such transfer will not affect the grazing preference or any outstanding grazing permit or lease, or preclude the issuance or renewal of a grazing permit or lease based on such property for a period of 2 years after the transfer. However, such a transferee shall qualify under paragraph (a) of this section within the 2-year period or the grazing preference shall be subject to cancellation. The authorized officer may grant extensions of the 2-year period where there are delays solely attributable to probate proceedings. (f) Transfers shall be for a period of not less than 3 years unless a shorter term is determined by the authorized officer to be consistent with management and resource condition objectives. (g) Failure of either the transferee or the transferor to comply with the regulations of this section may result in rejection of the transfer application or cancellation of grazing preference.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mori	Pete	Mori Ranches, LLC	NV	1440	2	Subpart 4110 - Qualifications and Preference	-must own base property to have a permit
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	35	Subpart 4110 - Qualifications and Preference	Mandatory Qualifications Sec 4110.1 (a) Except as provided under 4110.1-1, 4130.5 AND 4130.6-3, to qualify for grazing use on the public lands and applicant must be engaged in the livestock business, must own or control land or water base property, and must be:.....
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schickedanz	Jerry			1244	6	Subpart 4110 - Qualifications and Preference	Mandatory Qualifications Sec 4110.1 (a) Except as provided under 4110.1-1, 4130.5 AND 4130.6-3, to qualify for grazing use on the public lands and applicant must be engaged in the livestock business, must own or control land or water base property, and must be:...

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gammett	Glenda		OR	1382	2	Subpart 4110 - Qualifications and Preference	It is important, given the purpose of the Taylor Grazing Act, the establishment of grazing districts, and the Public Rangelands Improvement Act, that to qualify for grazing on public lands, the entity must own or control base property and actually graze livestock on the range to support a livestock business. Therefore, change the description of mandatory qualifications to include been engaged in the livestock business:
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Olson	Vicki		MT	941	5	Subpart 4110 - Qualifications and Preference	In the Mandatory qualifications section This should be specifically someone that is engaged in the production of livestock. The Taylor Grazing Act was passed for the purpose of the sustainability of the livestock industry. This in the regs would keep with that law. When you are talking about monitoring there should be the word quantitative data . There are times when the best guess is sometimes used and this def. would make it more clear what is allowed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	36	Subpart 4110 - Qualifications and Preference	If quantitative data shows a need to reduce active AUMs, those AUMs should be held as suspended use AUMs. A permanent reduction in Preference AUMs must not occur unless the Land Use Plan conveys that these AUMs are no longer available for livestock grazing and the Authorized Officer makes a formal finding on the basis of long-term quantitative monitoring data that there is no "realistic expectation that the AUMs can be returned to active livestock use in the foreseeable future." See 60 Fed. Reg. 9931 (2/22/1995).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	35	Subpart 4110 - Qualifications and Preference	Further, OCA recommends that language be added to 4110.3, "Changes in grazing status" to accommodate the concerns stated in the above paragraph: "The authorized officer shall periodically review the level of active use specified in a grazing permit/lease and may make changes to the terms and conditions as needed to accomplish allotment objectives. The AO shall first determine if livestock grazing is the causal factor for not achieving allotment objectives based on long-term rangeland monitoring trends. If the current livestock grazing program is determined to be the causal factor, the AO shall first implement changes in the management program to include, but are not limited to, changes in seasons of use, duration and timing of use, or rangeland improvements to accomplish a trend towards achieving allotment objectives before reducing active AUM's. Any reductions in active use will be placed in suspension."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gammett	Glenda		OR	1382	3	Subpart 4110 - Qualifications and Preference	Except as provided under If 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in. or facilitating the production of livestock and will use the public lands to graze livestock, and must be...: " 43 C.F.R. § 4110.3-2(b) Decreasing "permitted" use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Neil		ID	1097	1	Subpart 4110 - Qualifications and Preference	AUM reduction - BLM should be prohibited from reducing AUMs from a permit without quantifiable data collection over a period of time proves that vegetative production does not support the existing preference. Any reduction should be placed in suspension and not removed from preference.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	19	Subpart 4110 - Qualifications and Preference	At item (2)(c) in this section, please remove the existing language that an applicant shall certify to the AO that this base property meets the requirements under paragraphs (a) and (b) of this Section because there are NO REQUIREMENTS under (a) or (b) in 4110.2-1.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	25	Subpart 4110 - Qualifications and Preference	At 4110.3-3, implementing reductions in "permitted use": Please change this title to "Implementing reductions in active use". Please also remove the "interested public" from those with whom the local BLM must consult in this section because the "interested public" are not professional range scientist and should not try to influence BLM professionals on the basis of a political point of view. Also at 4110.3-3 (b), Please modify the last part of (b). The WSGB comments that Grazing decisions that adversely impact a Section 3 permittee that are not placed into Full Force and Effect, FFE, by the AO should be stayed during the appeal because a permittee appellant should not have to live under the terms and conditions under Appeal for the often very lengthy time it takes to adjudicate the issues in the appeal. Having to live under the terms and conditions during an Appeal often leads' to adverse economic consequences from which permittees cannot recover. An adverse grazing decision on a Section 3 permittee, placed in effect during an Appeal, is the same as being guilty before the permittee is actually found guilty.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	23	Subpart 4110 - Qualifications and Preference	At 4110.3-1- Increasing "permitted use". Please change this Title to "Increasing active use". At 4110.3-1, (c), please remove " and the interested public" from this paragraph because, in the opinion of the WSGB, with support language at Section 204 of the FLPMA, members of the "Interested public" do not have the professional training to be involved in the subjects in this paragraph. The "interested public" has the right to provide comments to the BLM on these subjects, but only "Affected citizens" should be granted the right to be directly involved with BLM Professionals on issues related to either increasing or decreasing active use. At this Section, the WSGB again comments that increases or decreases in active use must be based on data from a science-based monitoring program that assesses if allotment measurable objectives are being accomplished, over time.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	22	Subpart 4110 - Qualifications and Preference	At 4110.3, " Changes in Grazing Preference status: please remove the term, "data acceptable to the AO", and replace this phrase with " and science-based data as evidenced by rangeland studies conducted over time." The WSGB agrees that the BLM has the right to determine the percent of preference to allow as "active use" AUM's. The term "data acceptable to the AO" leaves too much discretion to the AO and can lead to the AO accepting less than science-based information as the basis for Grazing Decisions. The WSGB is aware of instances where BLM Decisions have been overturned because the information used by an AO on a Grazing Decision was not science-based. Acceptance of this comment with help insure that Decisions are based on science-based data and not on something less.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	25	Subpart 4110 - Qualifications and Preference	At 4110.2-4 Allotments: Please add an item (b) to say, " The AO shall not convert a dedicated stock driveway into an allotment. The WSGB has received proof that a Stock Driveway in Wyoming that was dedicated as such many years ago has been converted into a BLM allotment that now contains terms and conditions that are inconsistent with the traditional uses of that driveway by the permittees whose ranches have used this driveway for decades.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	21	Subpart 4110 - Qualifications and Preference	At 4110.2-4 Allotments: Please add an item (b) to say, " The AO shall not convert a dedicated stock driveway into an allotment. The WSGB has received proof that a Stock Driveway in Wyoming that was dedicated as such many years ago has been converted into a BLM allotment that now contains terms and conditions that are inconsistent with the traditional uses of that driveway by the permittees whose ranches have used this driveway for decades.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	20	Subpart 4110 - Qualifications and Preference	At 4110.2-2, please remove all references to "permitted use" and replace with the word "preference" and add the requirement that the total Preference level of AUM's now recognized by the BLM be included in the LUP for each section 3 permittee. At 4110.2-2: Please replace the term "permitted use" in this Title with the word "preference". Also in (a), please replace the requirement that the ..."permitted livestock use be based on the amount of forage available for livestock grazing as established in the LUP," to " the level of preference recognized by the BLM shall be listed in the LUP for each Section 3 permittee.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	17	Subpart 4110 - Qualifications and Preference	At 4110.1-1, the WSGB comments that the language currently at 4110.1-1 is not consistent with the direction at either Sections' 4110.3-1 or 4130.1-2. The WSGB recommends that language at 4110.1-1 convey that acquired lands within a grazing District be classified as Section 3 BLM lands and that the livestock carrying capacity be offered to existing permittees, or other qualified applicants per Section 4130.1-2. At 4130.1-2, please remove item (d) as recommended by the PLC and the WSGB.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	16	Subpart 4110 - Qualifications and Preference	At 4110.1 Mandatory qualifications, the WSGB recommends that this Section include the requirement that applicants must be engaged in the livestock business, as intended in the Taylor Grazing Act. The WSGB supports the language recommended by the PLC on this subject.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329	14	Subpart 4110 - Qualifications and Preference	Additional forage may be apportioned to qualified applicants for livestock grazing use consistent with multiple-use management objectives. (a) Additional forage temporarily available for livestock grazing use may be apportioned on a nonrenewable basis. (b) Additional forage available on a sustained yield basis for livestock grazing use shall first be apportioned in satisfaction of suspended permitted use to the permittee(s) or lessee(s) authorized to graze in the allotment in which the forage is available. (c) After consultation, cooperation, and coordination with the affected permittees or lessees, the State having lands or managing resources within the area, and the interested public, additional forage on a sustained yield basis available for livestock grazing use in an allotment may be apportioned to permittees or lessees or other applicants, provided the permittee, lessee, or other applicant is found to be qualified under subpart 4110 of this part. Additional forage shall be apportioned in the following priority: This is likely to be something that would require NEPA and would involve public comments. Interested public should not be consulted, involved in cooperation or coordination at this point, they don't have an affected interest or any expertise. (1) Permittees or lessees in proportion to their contribution or stewardship efforts which result in increased forage production; (2) Permittee(s) or lessee(s) in proportion to the amount of their permitted adjudicated preference use; and After decades of management and investment into the allotments the permittee(s) or lessee(s) that have grazing preference should be entitled to any increase in permitted use, at least back to the previous adjudicated preference numbers. (3) Other qualified applicants under § 4130.1-2 of this title. [53 FR 10233, Mar. 29,1988, as amended at 60 FR 9963, Feb. 22, 1995]

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	16	Subpart 4110 - Qualifications and Preference	4110.3 Topic Changes in grazing preference Comment/Observation In an areas where thresholds for wild horses and burro are exceeded, how are livestock carrying capacities determined? Action Requested Action: Guidelines should include more detail on the process for change grazing preferences and implementation of changes. The Department requests consultation to determine appropriate management levels to assist with the equitable distribution of resources, including available forage between wildlife, and livestock, (and when applicable wild horses and burros).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	6	Subpart 4110 - Qualifications and Preference	4110.2-3 - Transfer of Grazing Preference Rationale Decisions to transfer grazing preference should be made administratively to decrease time and resources necessary to affect change without environmental impacts.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329	11	Subpart 4110 - Qualifications and Preference	(d) Transfers of grazing preference in whole or in part are subject to the following requirements. (1) The transferee shall meet all qualifications and requirements of §§ 4110.1, 4110.2-1, and 4110.2-2. (2) The transfer applications under paragraphs (b) and (c) of this section shall evidence assignment of interest and obligation in range improvements authorized on public lands under § 4120.3 and maintained in conjunction with the transferred preference (see § 4120.3-5). The terms and conditions of the cooperative range improvement agreements and range improvement permits are binding on the transferee. (3) The transferee shall accept the terms and conditions of the terminating grazing permit or lease (see § 4130.2) with such modifications as he may request which are approved by the authorized officer or with such modifications as may be required by the authorized officer. (4) The transferee shall file an application for a grazing permit or lease to the extent of the transferred preference simultaneously with filing a transfer application under paragraph (b) or (c) of this section. (b) If base property is sold or leased, the transferee shall within 90 days of the date of sale or lease file with the authorized officer a properly executed transfer application showing the base property and the amount of permitted use being transferred in animal unit months. (c) If a grazing preference is being transferred from one base property to another base property, the transferor shall own or control the base property from which the grazing preference is being transferred and file with the authorized officer a properly completed transfer application for approval. If the applicant leases the base property, no transfer will be allowed without the written consent of the owner(s), and any person or entity holding an encumbrance of the base property from which the transfer is to be made. Such consent will not be required where the applicant for such transfer is a lessee without whose livestock operations the grazing preference would not have been established. (d) At the date of approval of a transfer, the existing grazing permit or lease shall terminate automatically and without notice to the extent of the transfer. (e) If an unqualified transferee acquires rights in base property through operation of law or testamentary disposition, such transfer will not affect the grazing preference or any outstanding grazing permit or lease, or preclude the issuance or renewal of a grazing permit or lease based on such property for a period of 2 years after the transfer. However, such a transferee shall qualify under paragraph (a) of this section within the 2-year period or the grazing preference shall be subject to cancellation. The authorized officer may grant extensions of the 2-year period where there are delays solely attributable to probate proceedings. (f) Transfers shall be for a period of not less than 3 years unless a shorter term is determined by the authorized officer to be

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329	10	Subpart 4110 - Qualifications and Preference	(a) Permitted use is granted to holders of grazing preference and shall be specified in all grazing permits and leases. Permitted use shall encompass all authorized use including livestock use, any suspended use, and conservation use, except for permits and leases for designated ephemeral rangelands where livestock use is authorized based upon forage availability, or designated annual rangelands. Permitted livestock use shall be based upon the amount of forage available for livestock grazing as established in the land use plan, activity plan, or decision of the authorized officer under § 4110.3-3, except, in the case of designated ephemeral or annual rangelands, a land use plan or activity plan may alternatively prescribe vegetation standards to be met in the use of such rangelands. (b) The permitted use specified shall attach to the base property supporting the grazing permit or grazing lease. The definition of" Grazing preference or preference means a superior or priority position against others for the purpose of receiving a grazing permit or lease. This priority is attached to base praperty owned or controlled by the permittee or lessee." Now it appears that "permitted use" is attached to base property. If permitted use is attached to base property shouldn't that be included in the definition of grazing preference? (c) The animal unit months of permitted use attached to: (1) The acreage of land base property on a pro rata basis, or (2) Water base property on the basis of livestock forage production within the service area of the water. [53 FR 10233, Mar. 29, 1988, as amended at 60 FR 9963, Feb. 22, 1995; 61 FR 4227, Feb. 5, 1996]

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329	8	Subpart 4110 - Qualifications and Preference	(a) Except as provided under §§ 4110.1-1, 4150.3, and 4150.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, and must be: (1) A citizen of the United States or have properly filed a valid declaration of intention to become a citizen or a valid petition for naturalization; or (2) A group or association authorized to conduct business in the State in which the grazing use is sought, all members of which are qualified under paragraph (a) of this section; or (3) A corporation authorized to conduct business in the State in which the grazing use is sought. (b) Applicants for the renewal or issuance of new permits and leases and any affiliates must be determined by the authorized officer to have a satisfactory record of performance. See comment under the definition of affiliates (1) Renewal of permit or lease. (i) The applicant for renewal of a grazing permit or lease, and an." affiliate, shall be deemed to have a satisfactory record of performance if the authorized officer determines the applicant and affiliates to be in substantial compliance with the terms and conditions of the existing Federal grazing permit or lease for which renewal is sought, and with the rules and regulations applicable to the permit or lease. See comment under the definition of affiliates. (ii) The authorized officer may take into consideration circumstances beyond the control of the applicant or affiliate in determining whether the applicant and affiliates are in substantial compliance with permit or lease terms and conditions and applicable rules and regulations. (2) New permit or lease. Applicants for new permits or leases, and any affiliates, shall be deemed not to have a record of satisfactory performance when (i) The applicant or affiliate has had any Federal grazing permit or lease cancelled for violation ofthe permit or lease within the 36 calendar months immediately preceding the date of application; or (ii) The applicant or affiliate has had any State grazing permit or lease, for lands within the grazing allotment for which a Federal permit or lease is sought, cancelled for violation of the permit or lease within the 36 calendar months immediately preceding the date of application; or (iii) The applicant or affiliate is barred from holding a Federal grazing permit or lease by order of a court of competent jurisdiction. Ic) In determining whether affiliation e)(ists, the authorized officer shall consider all appropriate factors, including, but not limited to, common ownership, common management, identity of interests among family members, and contractual relationships. (d) Applicants shall submit an application and any other relevant information requested by the authorized officer in order to determine that all qualifications have been met. [43 FR 29067, July 5,1978, as amended at 49 FR 6450, Feb. 21, 1984; 60 FR 9962, Feb. 22, 1995]

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329	16	Subpart 4110 - Qualifications and Preference	(a) After consultation, cooperation, and coordination with the affected permittee or lessee, the State having lands or managing resources within the area, and the interested public, reductions of permitted use shall be implemented through a documented agreement or by decision of the authorized officer. Decisions implementing § 4110.3-2 shall be issued as proposed decisions pursuant to § 4160.1, except as provided in paragraph (b) of this section. (b) When the authorized officer determines that the soil, vegetation, or other resources on the public lands require immediate protection because of conditions such as drought, fire, flood, insect infestation, or when continued grazing use poses an imminent likelihood of significant resource damage, after consultation with, or a reasonable attempt to consult with, affected permittees or lessees, the interested public, and the State having lands or responsible for managing resources within the area, the authorized officer shall close allotments or portions of allotments to grazing by any kind of livestock or modify authorized grazing use notwithstanding the provisions of paragraph (a) of this section. Notices of closure and decisions requiring modification of authorized grazing use may be issued as final decisions effective upon issuance or on the date specified in the decision. Such decisions shall remain in effect pending the decision on appeal unless a stay is granted by the Office of Hearings and Appeals in accordance with 43 CFR 4.21. [60 FR 9963, Feb. 22,1995] § 4110.4 Changes in public land acreage. § 4110.4-1 Additional land acreage. When lands outside designated allotments become available for livestock grazing under the administration of the Bureau of Land Management, the forage available for livestock shall be made available to qualified applicants at the discretion of the authorized officer. Grazing use shall be apportioned under § 4130.1-2 of this title. [53 FR 10234, Mar. 29, 1988] § 4110.4-2 Decrease in land acreage. (a) Where there is a decrease in public land acreage available for livestock grazing within an allotment: (1) Grazing permits or leases may be cancelled or modified as appropriate to reflect the changed area of use. (2) Permitted use may be cancelled in whole or in part. Cancellations determined by the authorized officer to be necessary to protect the public lands will be apportioned by the authorized officer based upon the level of available forage and the magnitude of the change in public land acreage available, or as agreed to among the authorized users and the authorized officer. (b) When public lands are disposed of or devoted to a public purpose which precludes livestock grazing, the permittees and lessees shall be given 2 years' prior notification except in cases of emergency (national defense requirements in time of war, natural disasters, national emergency needs, etc.) before their grazing permit or grazing lease and grazing

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	31	Subpart 4110 - Qualifications and Preference	(2) New permit or lease. Applicants for new permits or leases, and any affiliates, shall be deemed not to have a record of satisfactory performance when--- (i) The applicant or affiliate has had any Federal grazing permit or lease canceled for violation of the permit or lease within the 36 calendar month immediately preceding the date of application; or (ii) The applicant or affiliate has had any State grazing permit or lease, for land within the grazing allotment for which a Federal permit or lease is sought, canceled for violation of the permit or lease within the 36 calendar months immediately preceding the date of application; or (iii) The applicant or affiliate is barred from holding a Federal grazing permit or lease by order of a court of competent jurisdiction. (c) In determining whether affiliation exists, the authorized office shall consider all appropriate factors, including, but not limited to, common ownership, common management, identity of interests among family members, and contractual relationships. (d) Applicants shall submit an application and any other relevant information requested by the authorized office in order to determine that all qualifications have been met. COMMENTER RECOMMENDS ADDING AN (e) and (f): (e) Categories of actions excluded (categorical exclusions) from documentation in an environmental assessment (EA) or environmental impact statement (EIS): In the absence of extra ordinary circumstances, the following actions shall be considered routine actions for the grazing of public lands and shall be excluded from documentation in an EA or an EIS: (1) Renewal of 10 year Grazing Permits (2) Issuance of Temporary Non Renewable (TNR) Grazing Permits (f) Extra ordinary circumstances: The presence of an extra ordinary circumstance does not preclude the use of a categorical exclusion. In considering the proposed action, the authorized officer should determine whether or not any extra ordinary circumstances are present, and if so, the degree of the effects on the listed resources. If the authorized officer determines that the degree of the effect of the proposed action will significantly alter resource condition, the extra ordinary circumstance exists, that precludes use of a categorical exclusion. RATIONALE: Comment: Categorical exclusions are a lawful tool to use that will streamline the permitting process saving money and time for both parties.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	30	Subpart 4110 - Qualifications and Preference	(1) A citizen of the United States or have properly filed a valid declaration of intention to become a citizen or a valid petition for naturalization; or (2) A group or association authorized to conduct business in the State in which the grazing use is sought, all members of which are qualified under paragraph (a) of this section; or (3) A corporation authorized to conduct business in the State in which the grazing use is sought. (b) Applicants for the renewal or issuance of new permits and leases and any affiliates must be determined by the authorized officer to have a satisfactory record of performance. (1) Renewal of permit or lease. (i) The applicant for renewal of a grazing permit or lease, and any affiliate, shall be deemed to have a satisfactory record of performance if the authorized officer determines the applicant and affiliates to be in substantial compliance with the terms and conditions of the existing Federal grazing permit or lease for which renewal is sought, and with the rules and regulations applicable to the permit or lease. (ii) The authorized office may take into consideration circumstances beyond the control of the applicant or affiliate in determining whether the applicant and affiliates are in substantial compliance with permit or lease terms and conditions and applicable rules and regulations. COMMENTER RECOMMENDS ADDING (iii): (iii) Any determination must be based upon valid existing rights, previous adjudicated claims of non-compliance or upon claims of non-compliance that would be subject to adjudication either before or simultaneously with making the determination. Any adverse determination that results in the non-renewal of the expiring grazing permit only results in the non-renewal of the grazing permit, and not the cancellation of the grazing preference and associated active us which shall remain attached to the base property and be available through application and transfer procedures at 43 C.F.R. 4110.2-3 to the owner or controller of the base property that can qualify for the grazing permit. Any cancellation of preference or active use shall only occur as part of Subpart 4170. RATIONALE: Comment: Solely relying on the authorized officer to determine whether or not a permit or lease is granted a renewal leaves the door open for capricious decisions. There must be a documented reason for non-renewal.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	50	Subpart 4110 - Qualifications and Preference	Where lands have been acquired by the Bureau of Land Management through purchase, exchange, gift or Congress or Executive Order, and an agreement or the terms of the act or Executive Order provide that the Bureau of Land Management shall honor existing grazing permits or leases, such permittees or lessees are governed by the terms and condition in effect at the time of acquisition by the Bureau of Land Management, and are not subject to the requirements of §4110.1.. (49 FR 6450, Feb. 21, 1984) § 4110.2 Grazing preference. 5 4110.2 1 Base property. Proposed text: delete original text above Original text: (a) The authorized officer shall find land or water owned or controlled by Bureau of Land Management, Interior an applicant to be base property (see §4100.0-5) if: (1) It is capable of serving as a base of operations for livestock use of public lands within a grazing district; or (2) It is contiguous land, or when no applicant owns or controls contiguous land, noncontiguous land that is capable of being used in conjunction with a livestock operation which would utilize public lands outside a grazing district. (b) After appropriate consultation, cooperation, and coordination, the authorized officer shall specify the length of time for which land base property shall be capable of supporting authorized livestock during the year, relative to the multiple use management objective of the public lands. (c) An applicant shall provide a legal description, or plat, of the base property and shall certify to the authorized officer that this base property meets the requirements under paragraphs (a) and (b) of this section. A permittee's of lessee's interest in water previously recognized as base property on public land shall be deemed sufficient in meeting the requirement that the applicant control base property. Where such waters become unusable and are replaced by newly constructed or reconstructed water development that are the subject of a range improvement permit or cooperative range improvement agreement the permittee's or lessee's interest in the replacement water shall be deemed sufficient in meeting the requirement that the applicant control base property. (d) If a permittee or lessee loses ownership or control of all or part of his/ her base property, the permit or lease, to the extent it was based upon such lost property, shall terminate immediately without further notice from the authorized officer. However, if, prior to losing ownership or control of the base property, the permittee or lessee requests, in writing, that the permit or lease be extended to the end of the grazing season or grazing year, the termination date may be extended as determined by the authorized officer after consultation with the new owner. When a permit or lease terminates because of a loss of ownership or control of a base property, the grazing preference shall remain with the base property and be available through application and transfer
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gammatt	Glenda		OR	1382	6	Subpart 4110 - Qualifications and Preference	When there are conflicting applications for livestock grazing use, the current regulations allow the authorized officer to consider whether an applicant allows "public ingress or egress across privately owned or controlled land to public lands." 43 C.F.R. § 4110.1-2(d). An applicant who does not allow public access across their own private land should not be penalized for not providing the general public access over its private land. Allowing public access across private land should not be a criteria for who may or may not obtain approval of an application for grazing use. Therefore, delete 43 C.F.R. § 4110.1-2(d) which provides as a factor "public ingress or egress across privately owned or controlled land to public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lanham	Miteshell	Lander County, NV	NV	1219	7	Subpart 4110 - Qualifications and Preference	Updated regulations should ensure that the base property requirements, land and/or water are retained. However, it should be clarified that base property is to support a ranching operation when livestock are not grazing BLM-administered land. In addition that it is not required to fully sustain, on its own, the ranching operation (e.g., a ranch buys and feeds hay to fully sustain the herd when not grazing under the permit).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lally	Meghan	Salisbury Livestock Company		1119	1	Subpart 4110 - Qualifications and Preference	Under the current rules, if anything happens to degrade the quality or quantity of feed in a permit, the only recourse the BLM seems to have is to reduce or eliminate AUMs. This includes fires, floods, overgrazing by wildlife or wild horses. Currently, throughout the west, wild horses are over AML in almost every HMA. Rather than performing gathers, permittees are being asked to leave early, go to other permits, or not turn on at all, due to the depletion of feed and water by these horses. There needs to be other methods to allow permittees to graze their permits, which they have paid for and rely on. Alternative permits, offered nearby to the original permit, might be a solution. If the permittee currently trails to their permit, then they need to be offered a trail to the new permit. If a permittee is offered a permit 200 miles from their original permit, it is not cost effective to truck those animals a long distance, due to circumstances that are not their fault.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	12	Subpart 4110 - Qualifications and Preference	Transitioning between updating definitions and moving into essential changes for permits, we offer the proposal for evaluation in the EIS of changes to the present language associated with Subpart 4110.1 on Mandatory qualifications. Please include this update to section (a) of Subpart 4110.1 with the underlined wording... (a) Except as provided under §§ 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be..." (Continue with subsection numbering of (1), (2) and (3) as is currently worded)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	12	Subpart 4110 - Qualifications and Preference	Transfer of grazing preference CFB supports changes to Subpart 4110.3-2(b) to replace the present BLM approach of being obligated for automatic decreases in AUMs whenever transfers of grazing allotments take place. BLM should be required to give documented, specific, and science-based reasons for any actions taken. When range conditions support continued permitted use, AUMs should not be decreased. When range conditions which are not acceptable or the level of livestock use is exceeding carrying capacity, BLM should be required to consider modifying management practices rather than automatically reducing permitted AUMS. These management practice changes should evaluate whether different rotations, duration of grazing, etc. might assist to accomplish improvements in range conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Laurie		NM	1374	10	Subpart 4110 - Qualifications and Preference	The transfer of grazing preferences to areas that are presently not authorized for livestock grazing use, or are held in suspension, is negligent to say the least. These lands are not currently being used for a reason usually related to land and riparian area health concerns, threatened wildlife habitat, or due to livestock operators not adhering to grazing regulations, or the terms of their permit, that have resulted in ecological damages

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	5	Subpart 4110 - Qualifications and Preference	The Taylor Grazing Act, grazing districts, and Public Rangelands Improvement Act all require that grazing permits be issued to entities that own or control base property and actually graze livestock on the range. The regulations should be amended to require that a permittee must be actively engaged in the livestock business and intend to use the permitted allotments to graze livestock: OLD TEXT "§ 4110.1 Mandatory Qualifications. (a) Except as provided under §§ 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, and must be..." NEW TEXT "§ 4110.1 Mandatory Qualifications. (a) Except as provided under §§ 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be..." 43 C.F.R. § 4110.3-2(b) Decreasing active use. BLM has used rangeland heath determinations under Section 4180.2(c) and/or made land use plan objective determinations under Section 4100.0-8 or Section 4130.3-3 that unnecessarily reduced grazing. The grazing regulations should not obligate, nor imply, that BLM must impose automatic decreases in AUMs. Instead, Active use should be reduced only if other management practices (rotation, duration of deferment, improvement of distribution) do not work. Reduction of active use AUMs should only occur after modification of management practices fails to provide a solution and should only reduce AUMS to a level necessary to meet objectives with the implementation of the new practices. If quantitative data shows a need to reduce active AUMs, those AUMs should be held as suspended use AUMs. A permanent reduction in Preference AUMs must not occur unless the Land Use Plan conveys that these AUMs are no longer available for livestock grazing and the Authorized Officer makes a formal finding on the basis of long-term quantitative monitoring data that there is no "realistic expectation that the AUMs can be returned to active livestock use in the foreseeable future." See 60 Fed. Reg. 9931 (2/22/1995). OLD TEXT "§ 4110.3-2 Decreasing Use (b) When monitoring trends show grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the domestic livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall NEW TEXT "§ 4110.3-2 Decreasing Active Use (b)When monitoring trends show grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the domestic livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Lone Tree Cattle Company	CA	1344	2	Subpart 4110 - Qualifications and Preference	The Taylor Grazing Act, grazing districts, and Public Rangelands Improvement Act all require that grazing permits be issued to entities that own or control base property and actually graze livestock on the range. The regulations should be amended to require that a permittee must be actively engaged in the livestock business and intend to use the permitted allotments to graze livestock: "§ 4110.1 Mandatory Qualifications. (a) Except as provided under §§ 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be..." 43 C.F.R. § 4110.3-2(b) Decreasing active use. BLM has used rangeland health determinations under Section 4180.2(c) and/or made land use plan objective determinations under Section 4100.0-8 or Section 4130.3-3 that unnecessarily reduced grazing. The grazing regulations should not obligate, nor imply, that BLM must impose automatic decreases in AUMs. Instead, Active use should be reduced only if other management practices (rotation, duration of deferment, improvement of distribution) do not work. Reduction of active use AUMs should only occur after modification of management practices fails to provide a solution and should only reduce AUMS to a level necessary to meet objectives with the implementation of the new practices. If quantitative data shows a need to reduce active AUMs, those AUMs should be held as suspended use AUMs. A permanent reduction in Preference AUMs must not occur unless the Land Use Plan conveys that these AUMs are no longer available for livestock grazing and the Authorized Officer makes a formal finding on the basis of long-term quantitative monitoring data that there is no "realistic expectation that the AUMs can be returned to active livestock use in the foreseeable future." See 60 Fed. Reg. 9931 (2/22/1995). "§ 4110.3-2 Decreasing Active Use (b) When monitoring trends show grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the domestic livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of excess grazing documented by quantitative monitoring. (c) Any decrease in active use shall be classified as suspended use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	4	Subpart 4110 - Qualifications and Preference	The regulations should include wholesale changes from "permittee" to "preference holder." This would return to the intent of the Taylor Grazing Act and true grazing preference. The definition of "grazing preference or preference" should be restored to its pre-1995 version and include a priority position for renewal of a grazing permit. The amended definition should also recognize and restore the level of AUMs that were established for the grazing permit for permits that were decreased solely as a result of application of the 1995 definitional change; AUM changes, including increased AUM apportionments, that were made as a result of monitoring or other range conditions should not be adjusted as a result of the suggested definitional change - except through regularly scheduled land planning processes. Based on the prior regulations, the definition should be: "Grazing preference or preference means the total number of animal unit months on public lands apportioned and attached to base property owned or controlled by a permittee, lessee, or an applicant for a permit or lease. Grazing preference includes active use and use held in suspension, and other uses as authorized under these regulations and provided in agency guidance and policy. Grazing preference holders have a superior or priority position against others for the purpose of receiving a grazing permit or lease. The Preference number of AUMs should be documented and shown for each grazing permit in the respective Land Use Plans."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	3	Subpart 4110 - Qualifications and Preference	The regulations should include clarification that if a permitted use for a grazing permit is to be reduced due to another permitted multiple use, mainly mining, any reduction would be based on field work and monitoring to quantify the actual forage lost, not some simple math exercise as we have often seen occur (e.g., simply dividing total AUMs across an allotment into the acreage lost to grazing due to an anthropogenic disturbance).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	5	Subpart 4110 - Qualifications and Preference	The regulations should ensure that base property requirements, land and/or water, are retained. But, it should be clarified that base property is to support a ranching operation when livestock are not grazing BLM-administered land but is not required to fully sustain, on its own, the ranching operation (e.g., a ranch buys and feeds hay to fully sustain the herd when not grazing under the permit).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	18	Subpart 4110 - Qualifications and Preference	The notice indicates BLM may consider ways to "improve" transfers of grazing preference from one qualified permittee to another. 85 Fed. Reg. 3411. In order to provide any meaningful comment on this proposed issue, BLM must provide to the public detailed information on perceived problems and the agency's intended "clarifications." Any changes to grazing preference and qualifications should specify that no person may qualify for grazing use who has ever failed to comply with grazing permit terms and conditions (in particular, utilization levels), repeatedly trespassed grazed on public lands, or failed to maintain exclosures or other fences on public lands. See, e.g., W. Watersheds Proj. v. Bernhardt, --F. Supp. 3d --, 2019 WL 7040923 (D. Or. Dec. 20, 2019) (Secretary's failure to make a finding of satisfactory performance, in reissuing cancelled grazing permit was arbitrary, capricious, an abuse of discretion, and not in accordance with FLPMA). The regulations should be equally specific in setting forth the criteria for disqualifying a person for receiving a grazing preference, as are the current rules for base property and grazing preference requirements. Moreover, any updates to transfer rules should authorize managers to consider options for grazing permit/lease retirement.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	13	Subpart 4110 - Qualifications and Preference	The grazing regulations should assure that every allotment is reasonably being grazed The Taylor Grazing Act requires that preference to permits be given to applicants "engaged in the livestock business."3 Traditionally this was interpreted so that only someone who was engaged in the livestock business could own a permit. However, in the 1995 revision of the grazing regulations, the qualification for owning a permit were opened to individuals who owned or controlled base property that is capable of being used in the livestock business.4 As a consequence some organizations own BLM grazing permits and find ways to maintain ownership of the permit without livestock grazing or very limited, temporary grazing.5 The BLM should revise regulations to resolve this issue. If the permit holder is not grazing an allotment, that allotment should be available to a qualified individual who will utilize the forage and graze the allotment.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	16	Subpart 4110 - Qualifications and Preference	The DCA holds that BLM has, in a number of cases, made adverse rangeland health determinations under Section 4180.2(c) and/or has made adverse land use plan objective determinations under Section 4100.0-8 or Section 4130.3-3. Historically, the BLM has used these adverse determinations to justify decreasing permitted AUMs under Section 4110.3-2(b) without quantifying the decrease. This occurs most frequently when BLM is attempting to rationalize any decrease in Permitted Use based upon two of the three conditions, i.e. Subpart 4180 and Utilization Patterns, in Section 4110.3-2(b) which do not, in-and-of-themselves, quantify grazing capacity and the associated decrease in Permitted Use AU Ms
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	14	Subpart 4110 - Qualifications and Preference	Subpart 4110.3-2(b) - Transfer of grazing preference AFBF supports changes to Subpart 4110.3-2(b) to replace the present BLM approach of being obligated for automatic decreases in AUMs whenever transfers of grazing allotments take place. BLM should be required to give documented, specific, and science-based reasons for any actions taken. When range conditions support continued permitted use, AUMs should not be decreased. When range conditions which are not acceptable or the level of livestock use is exceeding carrying capacity, BLM should be required to consider modifying management practices rather than automatically reducing permitted AUMS. These management practice changes should evaluate whether different rotations, duration of grazing, etc. might assist to accomplish improvements in range conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	3	Subpart 4110 - Qualifications and Preference	Subpart 4110.3-2 - Decreasing Permitted Use The proposed regulation updates should replace the present BLM approach of automatically decreasing Animal Unit Months (AUMs) whenever transfers of grazing allotments take place. The Authorized Officer should give documented, specific, science-based reasons that are attributable to livestock utilization, for any reductions to occur. BLM should modify management practices prior to reducing AUMS. Include the following wording in Section (b) & add part (c): (b) When monitoring shows grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of the inconsistent use or carrying capacity. (c) Any decrease in active use shall be classified as suspended use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	13	Subpart 4110 - Qualifications and Preference	Subpart 4110.1 - Qualifications and Preference (Mandatory qualifications) Subpart 4110.1 on Mandatory qualifications should be modified as follows: REVISE WITH FOLLWING TEXT: (a) Except as provided under §§ 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be..."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	2	Subpart 4110 - Qualifications and Preference	Subpart 4110.1 - Qualifications and Preference Include the following language: (a) "To qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in or facilitating the production of livestock; and will use the permit for livestock production, ..."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	2	Subpart 4110 - Qualifications and Preference	Short term transfers are used to sublease the permit and base property. Under the existing transfer rules, a transfer requires application with approval by the authorized officer. 43 C.F.R. § 4110.2-3. Transfers "shall be for a period of not less than 3 years" unless a shorter term is determined to be consistent with resource objectives. Id. at § 4110.2-3(f). Short-term(e.g. 3 year) permit transfers should be issued without a decision when the effect of that transfer is purely administrative. Changes in the name of the permittee should proceed without a formal decision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Rosemary			1194	3	Subpart 4110 - Qualifications and Preference	Section 4110.4-2 (b) Preference grazing allotments were legally adjudicated by the Taylor Grazing Act of 1934, and these are tied to the qualified base property owned or controlled by the owner of that "preference." Therefore, neither the Secretary of the Interior nor the BLM have a legal right to cancel a "preference" that would preclude livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Rosemary			1194	2	Subpart 4110 - Qualifications and Preference	Section 4110.2-3 (4)(f) The 3 year minimum on transfers of grazing preference permits should be extended up to 10 years which would help to eliminate government waste of time and resources. Another government saving would be to use the categorical exclusion for renewing some permits and eliminate the protest period.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	11	Subpart 4110 - Qualifications and Preference	Section 4110.2-2: The statement, "Permitted livestock use shall be based upon the amount of forage available for livestock grazing ... in the case of designated ephemeral or annual rangelands" does not address the reality of many rangelands in the Great Basin and broader Intermountain West. Many of these rangelands are a mix of annual grasses (primarily cheatgrass or medusahead, but other species also occur), with a residual component of perennial grasses (often Sandberg bluegrass and squirreltail are the primary species). They are mixed communities for which management must address both lifeforms, with the intent of reducing seed production, seed survival, seed germination (often by modification of the litter component at the soil surface) and/or seedling survival of the annual species, while providing at a minimum, no harm to the desired residual perennial grasses and ideally some benefit, most years. Much of this can be accomplished by targeted and strategic grazing outside the growing season of the perennial species, when removal of dead leaves and stems from the summer/fall dormant perennial grasses has little to no effect on their live plant parts, which are at or below the soil surface. The current utilization limits that are in place for an entire grazing year often do not allow for the removal of additional biomass from the perennial vegetation, yet such removal when the plant is dormant would have no adverse effect on those perennial plants. Utilization needs to be used as a growing season management tool, not as a tool with the same applicability year-round.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	15	Subpart 4110 - Qualifications and Preference	Section (b) of 4110.3-2, Decreasing Preference should be modified as follows: (b) When monitoring shows grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of the inconsistent use or carrying capacity. Any adverse determination that results in the nonrenewal of a grazing permit/lease only results in the nonrenewal of the grazing permit/lease, and not the cancellation of the preference which shall remain attached to the base property and be available through application and transfer to the new owner or lessee of the base property, or transferred to other qualified base property if the permittee/lessee whose permit/lease was canceled for cause continues to own the original base property. (c) Any decrease in active use shall be classified as suspended use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	O'Toole	Sharon	Salisbury Livestock Co., Banjo Sheep Company, LLC	WY	1299	1	Subpart 4110 - Qualifications and Preference	Reduction of AUMs needs to be a last resort, not the first tool turned to by BLM personnel. First, wild horses, a non-native species, should be kept at AML numbers before reduction of livestock AUMs is ever considered. Horses are a valued part of the landscape, but their interests should not be held above all other uses, including wildlife and rangeland management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Coombs	Cody		NV	855	2	Subpart 4110 - Qualifications and Preference	Pursuant to the Taylor Grazing Act, BLM should manage lands for livestock grazing, and ensure permit holders are in the livestock business and/or intend to use public lands for grazing. Please revise the regulations at 43 CFR 4110.1(a) to require that an individual, corporation or other entity be a stock owner, or intends to become a stock owner within two years before issuing long term grazing preference permit. A temporary permit could be issued to an individual, business or other for two years if they are a start-up livestock business. If the applicant fails to utilize their preference permit within two years, their preference could be cancelled and available for application by other qualified applicants. Rationale: There are some groups posing as "conservation groups" who purchase grazing preference from permittees with the sole purpose of closing an allotment from grazing, or to "relinquish" the permit to BLM for purposes of retiring the permit. Regulations need to meet the intent of the Taylor Grazing Act, which states in part: "Secretary of the Interior is authorized to issue...permits to graze livestock...to such bonafide settlers, residents, and other stock owners as under his rules and regulations are entitled to participate in the use of the range..." 43 U.S.C §315b. Ensuring the regulations meet this intent of the Taylor Grazing Act would reduce abuse by those who intend to remove livestock from public range. See example below where a group was issued a grazing preference, nearly 20 years ago, and they still fail to graze the areas they are permitted: https://casetext.com/case/stewart-v-kempthorne-4 (Stewart v. Kempthorne, 593 F. Supp.2d 1240 (D. Utah 2008)).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhalde	John		NV	1013	1	Subpart 4110 - Qualifications and Preference	Pursuant to the Taylor Grazing Act, BLM should manage lands for livestock grazing, and ensure permit holders are in the livestock business and/or intend to use public lands for grazing. Please revise the regulations at 43 CFR 4110.1(a) to require that an individual, corporation or other entity be a stock owner, or intends to become a stock owner within two years before issuing long term grazing preference permit. A temporary permit could be issued to an individual, business or other for two years if they are a start-up livestock business. If the applicant fails to utilize their preference permit within two years, their preference could be cancelled and available for application by other qualified applicants. Rationale: There are some groups posing as “conservation groups” who purchase grazing preference from permittees with the sole purpose of closing an allotment from grazing, or to “relinquish” the permit to BLM for purposes of retiring the permit. Regulations need to meet the intent of the Taylor Grazing Act, which states in part: “Secretary of the Interior is authorized to issue...permits to graze livestock...to such bonafide settlers, residents, and other stock owners as under his rules and regulations are entitled to participate in the use of the range...” 43 U.S.C §315b. Ensuring the regulations meet this intent of the Taylor Grazing Act would reduce abuse by those who intend to remove livestock from public range. See example below where a group was issued a grazing preference, nearly 20 years ago, and they still fail to graze the areas they are permitted: https://casetext.com/case/stewart-v-kempthorne-4 (Stewart v. Kempthorne, 593 F. Supp.2d 1240 (D. Utah 2008)).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	HANSEN	NIELS		WY	794	3	Subpart 4110 - Qualifications and Preference	Preference: Preference should be returned to it's pre-Reform 94 definition. The courts and the IRS recognize the value and standing of a Grazing Preference, it's time BLM's regulations returned to a point where BLM recognizes the value also.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Rankin		NM	1179	4	Subpart 4110 - Qualifications and Preference	Preference, which is defined as a prior right or claim, was legally adjudicated to the surface base property owner in a split estate and is controlled by the owner of said preference. Therefore, neither the Secretary of the Interior nor BLM officials have the legal authority to cancel a preference.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	6	Subpart 4110 - Qualifications and Preference	Preference was legally adjudicated to the qualified base property owned or controlled by the owner of the preference and as such, neither the Secretary of the Interior nor BLM officials have the legal authority to cancel a preference.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	12	Subpart 4110 - Qualifications and Preference	Preference Holder instead of Permittee should be used. As well, AUM'S that were once suspended but on the record should be returned under the new regulations and should be able to be used during times of abundant forage or when rangeland conditions Improve and objectives are being met.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klein	Tammy	Central Valley and Penasco Soil and Water Conservation Districts	NM	1144	4	Subpart 4110 - Qualifications and Preference	Preference AUM's have been legally adjudicated to private base property and authorized by Congress. Permit value is based on Preference AUM's attached to that ranch. BLM should not be able to cancel Preference AUM's without peer science Review of Measurable Data
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klein	Tammy	Central Valley and Penasco Soil and Water Conservation Districts	NM	1144	5	Subpart 4110 - Qualifications and Preference	Preference AUM's are dependent of the value of permit. Also, bank loan capabilities and cutting grazing permits hurt counties' tax base in which the counties tax the number of cattle on the ranch. Families lose stability of having economics of making a living.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	13	Subpart 4110 - Qualifications and Preference	Please amend the updated to section b of 4110.3-2 Decreasing Preference with the underlined wording... also add sub (c) ORIGINAL TEXT (b) When monitoring or documented field observations show grazing use or patterns of use are not consistent with the provisions of subpart 4180 of this part, or grazing use is otherwise causing an unacceptable level or pattern of utilization, or when use exceeds the livestock carrying capacity as determined through monitoring, ecological site inventory, or other acceptable methods, the authorized officer will reduce active use, otherwise modify management practices, or both. To implement reductions under this paragraph, BLM will suspend active use. COMMENTER'S SUGGESTED NEW TEXT (b) When monitoring shows grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of the inconsistent use or carrying capacity. Any adverse determination that results in the nonrenewal of a grazing permit/lease only results in the nonrenewal of the grazing permit/lease, and not the cancellation of the preference which shall remain attached to the base property and be available through application and transfer to the new owner or lessee of the base property, or transferred to other qualified base property if the permittee/lessee whose permit/lease was canceled for cause continues to own the original base property. (c) Any decrease in active use shall be classified as suspended use; and all suspended use for each allotment, over time, must be noted and accounted for.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris			1188	2	Subpart 4110 - Qualifications and Preference	PERMIT AND LEASE TRANSFERS- 10 year minimums make total sense here and it's the Agencies that make this process difficult. If same terms are to be maintained, it's reasonable for ranchers to be able to transfer permits as part of their legitimate property right.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris	Ninety-Six Ranch LLC		1285	2	Subpart 4110 - Qualifications and Preference	PERMIT AND LEASE TRANSFER5- 10 year minimums make total sense here and it's the Agencies that make this process difficult. If same terms are to be maintained, it's reasonable for ranchers to be able to transfer permits as part of their legitimate property right.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	38	Subpart 4110 - Qualifications and Preference	Original text: Changes in permitted use Proposed change: 4110.3 Changes in active use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	40	Subpart 4110 - Qualifications and Preference	Original text: 4110.3-2: Decreasing permitted use. Proposed text: 4110.3-2: Decreasing active use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	39	Subpart 4110 - Qualifications and Preference	Original text: 4110.3-1 Increasing permitted use. Proposed change: 4110.3-1 Increasing active use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	37	Subpart 4110 - Qualifications and Preference	Original text: 4110.2-2 Specifying permitted use Proposed change: 4110.2-2 Specifying active use

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	49	Subpart 4110 - Qualifications and Preference	<p>Original text: (c) After consultation, cooperation, and coordination, with the affected permittees or lessees the State having lands or managing resources within the area, and the interested public, additional forage on a sustained yield basis available for livestock grazing use in an allotment may be apportioned to permittee(s) or lessee (s) or other applicants, provided the permittee, lessee, or other applicant is found to be qualified under subpart 4110 of this part. Additional forage shall be apportioned in the following priority: (1) Permittee(s) or lessee(s) in proportion to the contribution or effort which resulted in increased forage production (1) Permittees or lessees in proportion to their contribution or stewardship effort which result in increased forage production (2) Permittee(s) or lessee(s) in proportion to the amount of their permitted use and (3) Other qualified applicants under Sec. 4130.1-3 of this title. [53 FR 10233, Mar. 29, 1988] Proposed text: (c) After consultation, cooperation, and coordination, with the affected permittees or lessees and the State having lands or managing resources within the area, additional forage on a sustained yield basis available for livestock grazing use over and above preference(s) of the permittee(s) or lessee(s) in an allotment may be apportioned. Additional forage shall be apportioned in the following priority: (1) Permittee(s) or lessee(s) in proportion to the contribution or effort which resulted in increased forage production (2) Permittees or lessees in proportion to their contribution or stewardship effort which result in increased forage production (3) Permittee(s) or lessee(s) in proportion to the amount of their grazing preference and; (4) Other qualified applicants under Sec. 4130.1-3 of this title. Original text: § 4110.3-2 Decreasing permitted use (a) Permitted use may be suspended in whole or in part on a temporary basis due to drought, fire, or other natural causes, Of to facilitate installation, maintenance, or modification of range improvements Proposed text: § 4110.3-2 Decreasing active use (a) Active use may be suspended in whole or in part on a temporary basis due to drought, fire, or other natural causes, to facilitate installation, maintenance, or modification of range, improvements or if there unacceptable level of use when livestock exceed carrying capacity. Original text: (b) When monitoring of field observations show grazing use or patterns of use are not consistent with the provision of subpart 4180, or grazing use i scausing an unacceptable level or ppattern of utilization or, when use exceeds the livestock carrying capapcity as determined through monitoring, ecological site inventory or other acceptable methods, the authorized officer shall reduce permitted grazing use or otherwise modify management practices. [53 FR 10234, Mar. 29, 1988] Proposed text: (b) When decreasing active use, the authorized officer shall consult with affected permittee(s) or lessee(s)</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	52	Subpart 4110 - Qualifications and Preference	<p>Original text: (a) Except as provided under §§4110.1-1, 4130.5 and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, and must be: Proposed text: (a) Except as provided under §§4110.1-1, 4130.5 and 4130.6-3, to qualify for grazing use on the public lands an applicant must be engaged in the livestock business, must own or control land or water base property, and must be: Original text: (1) A citizen of the United States or have properly filed a valid declaration of intention to become a citizen or a valid petition for naturalization; or (2) A group or association authorized to conduct business in the State in which the grazing use is sought, all members of which are qualified under paragraph (a) of this section; or (3) A corporation authorized to conduct business in the State in which the grazing use is sought. (b) Applicants for the renewal or issuance of new permits and leases and any affiliates must be determined by the authorized officer to have a satisfactory record of performance. Proposed text (new): Any determination must be based upon previous adjudicated claims of non-compliance or upon claims of non-compliance that would be subject to adjudication either before or simultaneously with making the determination. Any adverse determination that results in the non-renewal of the expiring grazing permit only results in the non-renewal of the grazing permit, and not the cancellation of the grazing preference and associated active us which shall remain attached to the base property and be available through application and transfer procedures at 43 C.F.R. 4110.2-3 to the owner or controller of the base property that can qualify for the grazing permit. Any cancellation of preference or active use shall only occur as part of Subpart 4170. Original text: (1) Renewal of permit or lease. (i) The applicant for renewal of a grazing permit or lease, and any affiliate, shall be deemed to have a satisfactory record of performance if the authorized officer determines the applicant and affiliates to be in substantial compliance with the terms and conditions of the existing Federal grazing permit or lease for which renewal is sought, and with the rules and regulations applicable to the permit or lease. (ii) The authorized office may take into consideration circumstances beyond the control of the applicant or affiliate in determining whether the applicant and affiliates are in substantial compliance with permit or lease terms and conditions and applicable rules and regulations. (2) New permit or lease. Applicants for new permits or leases, and any affiliates, shall be deemed not to have a record of satisfactory performance when: (i) The applicant or affiliate has had any Federal grazing permit or lease canceled for violation of the permit or lease within the 36 calendar month immediately preceding the date of application or (ii) the applicant or affiliate has had any State</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	51	Subpart 4110 - Qualifications and Preference	<p>Original text: (a) Except as provided under §§4110.1-1, 4130.5 and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, and must be: Proposed text: (a) Except as provided under §§4110.1-1, 4130.5 and 4130.6-3, to qualify for grazing use on the public lands an applicant must be engaged in the livestock business, must own or control land or water base property, and must be: Original text: (1) A citizen of the United States or have properly filed a valid declaration of intention to become a citizen or a valid petition for naturalization; or (2) A group or association authorized to conduct business in the State in which the grazing use is sought, all members of which are qualified under paragraph (a) of this section; or (3) A corporation authorized to conduct business in the State in which the grazing use is sought. (b) Applicants for the renewal or issuance of new permits and leases and any affiliates must be determined by the authorized officer to have a satisfactory record of performance. Proposed text (new): Any determination must be based upon previous adjudicated claims of non-compliance or upon claims of non-compliance that would be subject to adjudication either before or simultaneously with making the determination. Any adverse determination that results in the non-renewal of the expiring grazing permit only results in the non-renewal of the grazing permit, and not the cancellation of the grazing preference and associated active use which shall remain attached to the base property and be available through application and transfer procedures at 43 C.F.R. 4110.2-3 to the owner or controller of the base property that can qualify for the grazing permit. Any cancellation of preference or active use shall only occur as part of Subpart 4170. Original text: (1) Renewal of permit or lease. (i) The applicant for renewal of a grazing permit or lease, and any affiliate, shall be deemed to have a satisfactory record of performance if the authorized officer determines the applicant and affiliates to be in substantial compliance with the terms and conditions of the existing Federal grazing permit or lease for which renewal is sought, and with the rules and regulations applicable to the permit or lease. (ii) The authorized office may take into consideration circumstances beyond the control of the applicant or affiliate in determining whether the applicant and affiliates are in substantial compliance with permit or lease terms and conditions and applicable rules and regulations. (2) New permit or lease. Applicants for new permits or leases, and any affiliates, shall be deemed not to have a record of satisfactory performance when: (i) The applicant or affiliate has had any Federal grazing permit or lease canceled for violation of the permit or lease within the 36 calendar month immediately preceding the date of application or (ii) the applicant or affiliate has had any State</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	38	Subpart 4110 - Qualifications and Preference	OLD TEXT: § 4110.3-3 Implementing reductions in permitted use. (a) After consultation, coordination and cooperation with the affected permittee or lessee the State have lands or managing resources within the area and the interested public reduction of permitted use shall be implemented though a documented agreement or by decision of the authorized officer. Decisions implementing §4110.3-2 shall be issued as proposed decisions pursuant to §4160.1, except as provided in paragraph (b) of this section. (b) When the authorized officer determines that the soil, vegetation, or other resources on the public lands require immediate protection because of conditions such as drought, fire, flood, or insect infestation, or when continued grazing use poses an imminent likelihood of significant resource damage, after consultation with, or a reasonable attempt to consult with, affected permittees or lessees, the interested public, and the State having lands or responsible for managing resources within the area, the authorized officer shall close allotments or portions of allotments to grazing by any kind of livestock or modify authorized use notwithstanding the provisions of paragraph (a) of this section. Notices of closure and decisions requiring modification of authorized grazing use may be issued as final decisions effective upon issuance or on the date specified in the decision. Such decisions shall remain in effect pending the decision on appeal unless a stay is granted by the Office of Hearings and Appeals in accordance with 43 CFR 4.21. Notices of closure and decisions requiring modification of authorized grazing use may be issued as final decisions effective upon issuance or on the date specified in the decision. Such decisions shall remain in effect pending the decision on appeal unless a stay is granted by the Office of Hearings and Appeals in accordance with 43 CFR 4.21. NEW TEXT: § 4110.3-3 Implementing reductions in active use. (a) After consultation, coordination and cooperation with the affected permittee or lessee, the affected counties, and the State have lands or managing resources within the area and the affected public, reduction of active use shall be implemented though a documented agreement or by decision of the authorized officer. Decisions implementing §4110.3-2 shall be issued as proposed decisions pursuant to §4160.1, except as provided in paragraph (b) of this section. (b) When the authorized officer determines that the level of active use by livestock is not contributing to achievement of allotment management plan and/or allotment objectives that have been develop in close consultation, cooperation and coordination with the permittee(s) or lessee(s), the authorized officer determines the soil, vegetation, or other resources on the public lands require immediate temporary protection because of conditions such as drought, fire, flood, or insect infestation, or when continued grazing use poses an imminent likelihood of significant resource
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	12	Subpart 4110 - Qualifications and Preference	OLD TEXT [2006 Grazing Regulations] § 4110.3-2 Decreasing Active Use (b) When monitoring or documented field observations show grazing use or patterns of use are not consistent with the provisions of subpart 4180 of this part, or grazing use is otherwise causing an unacceptable level or pattern of utilization, or when use exceeds the livestock carrying capacity as determined through monitoring, ecological site inventory, or other acceptable methods, the authorized officer will reduce active use, otherwise modify management practices, or both. To implement reductions under this paragraph, BLM will suspend active use. COMMENTER'S RECOMMENDED NEW TEXT: § 4110.3-2 Decreasing Active Use (b) When monitoring trends show grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the domestic livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of excess grazing documented by quantitative monitoring. (c) Any decrease in active use shall be classified as suspended use.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	26	Subpart 4110 - Qualifications and Preference	OLD TEXT The authorized officer shall periodi-cally review the permitted use speci-fied in a grazing permit or lease and shall make changes in the permitted use as needed to manage, maintain or improve rangeland productivity, to as-sist in restoring ecosystems to prop-erly functioning condition, to conform with land use plans or activity plans, or to comply with the provisions of subpart 4180 of this part. These changes must be supported by monitoring, field observations, ecological site inventory or other data acceptable to the author-ized officer. NEW TEXT The authorized officer shall periodically review the permitted use specified in a grazing permit or lease and shall make changes in the permitted use as needed to manage, maintain or improve rangeland productivity, , to conform with land use plans or activity plans, or to comply with the provisions of subpart 4180 of this part. These changes must be supported by monitoring, acceptable to the authorized officer. RATIONALE Monitoring(see definition of monitoring), if you have good monitoring and trend data then field observation and ecological site inventory and other data are unnecessary. There is no assurance to the quality or impartiality of these other types of information, which allows abuse and arbitrary decisions based on bias or opinion.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	1	Subpart 4110 - Qualifications and Preference	OLD TEXT 4110.2-2 Specifying permitted use. NEW TEXT 4110.2-2 Specifying active use. RATIONALE NONE GIVEN
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lally	Meghan	Salisbury Livestock Company		1119	3	Subpart 4110 - Qualifications and Preference	Many BLM permits have been held for decades, with no use made of their AUMs. This leads to AUMs on the books that are not used. The BLM should more closely resemble the USFS regulations that AUMs must be used or lost. The current system does not allow new operators to get into the business, because so many AUMs are not in use. AUMs that are leased are not the problem. The BLM system that allows permittees to lease to other operators is a good one.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keck	John E.			1482	5	Subpart 4110 - Qualifications and Preference	Mandatory Qualifications, Sec 4110.l(a) except as provided under 4110.1-1, 4130.5 and 4130.6-3, must be parties engaged in the livestock business without nonuse violations. They must own or control land or water base property.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cozzens	Paul	Iron County Commission	UT	1492	2	Subpart 4110 - Qualifications and Preference	Mandatory Qualifications -require that qualifications of grazing on public lands be strictly tied to base property where the allotment holder is engaged in the production of livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	Tony		ID	1088	5	Subpart 4110 - Qualifications and Preference	Maintaining Preference In addition to the change back to the pre-1995 definition on preference, we also advocate that if there is a situation where range conditions are deemed unsatisfactory, and it has been sufficiently proven through monitoring and proper procedure and documentation to be the result of livestock grazing, and this has led to a grazing permit not being renewed, that action cannot affect the preference position held by the permittee.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Clark	Haley			1236	2	Subpart 4110 - Qualifications and Preference	It would also be useful to have a refund for limited use on allotments as well. This should not be an issue since our BLM authorized officer would know the actual use compared to the amount charged for initial use. This would help our bottom line as producers who are truly reliant on the weather for a successful growing season on allotments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schickedanz	Jerry			1244	2	Subpart 4110 - Qualifications and Preference	Increased AUM's that occur from range improvement practices such as brush control under "Restore New Mexico and Equip" programs should available to be allocated to livestock, not only to wildlife and watershed. Exclusion of any AUM's allocated to livestock is very demeaning to the Permittee as it implies that grazing is bad and wildlife are good. Not a good way to encourage cooperation. The application of the standards and guidelines already take into consideration the watershed needs. This limitation needs to be removed. This limitation needs to be clarified in the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	13	Subpart 4110 - Qualifications and Preference	If quantitative data shows a need to reduce active AUMs, those AUMs should be held as suspended use AUMs. A permanent reduction in Preference AUMs must not occur unless the Land Use Plan conveys that these AUMs are no longer available for livestock grazing and the Authorized Officer makes a formal finding on the basis of long-term quantitative monitoring data that there is no "realistic expectation that the AUMs can be returned to active livestock use in the foreseeable future." See 60 Fed. Reg. 9931 (2/22/1995).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	38	Subpart 4110 - Qualifications and Preference	However, in cases where an adverse determination that allotment objectives are not being met due to current livestock grazing practices, BLM is currently failing to consider the full range of these "appropriate actions[s]" under these Subparts. At this time, BLM is ignoring some, or all, of its "toolbox" that could be utilized to address resource concerns. This is particularly apparent in the application of Subpart 4120 wherein BLM has refused to consider, or has excluded, range improvements that could or would fix purported resource concerns. If BLM finds that allotment management objectives are not being met, then BLM should limit any adverse findings and/or adverse modifications of otherwise lawful grazing to a specific and discrete piece of "public lands," as opposed to extrapolating adverse determinations to an entire pasture allotment. BLM currently interprets Section 4180.2(c) as allowing the BLM to apply any adverse rangeland health determination in a pasture (or discrete confined area enclosed by fence and/or natural topography) to another pasture(s) resulting in an adverse determination for such other pasture(s). This occurs even though BLM's own monitoring data for the adverse determination is specific to a pasture and not to any other pasture(s).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	15	Subpart 4110 - Qualifications and Preference	Given the purpose of the Taylor Grazing Act, the establishment of grazing districts, and the Public Rangelands Improvement Act, it is important that to qualify for grazing on public lands, the entity must own or control base property and actually graze livestock on the range to support a livestock business. Therefore, the DCA recommends including a requirement that a permittee must be actively engaged in the livestock business and intend to use the permitted allotments as part of their livestock operation: "§ 4110.1 Mandatory Qualifications. (a) Except as provided under §§ 4110.1-1,4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock. and must be ... "

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	11	Subpart 4110 - Qualifications and Preference	Furthermore, grazing preference is recognized in Idaho law as an appurtenance to base property, and therefore is a property right. Idaho Code 25-901 states: "The United States Congress, in fulfilling the constitutional obligation to manage the property of the United States, passed the Taylor grazing act in 1934. Through this act, congress acknowledged grazing preference rights and provided for adjudication of allotments on which the grazing preference right was exercised. Livestock ranches are bought, sold, traded and inherited with an assurance that the appurtenant grazing preference rights will be transferred to the new base property owner. Therefore, a grazing preference right shall be considered an appurtenance of the base property through which the grazing preference is maintained." Idaho Code 25-902 states in part: "When a grazing preference right is made use of through sale, rental or other equitable distribution of base property to another person . . . such person . . . shall not thereafter, without his consent, be deprived of the same without just compensation." And Idaho Code 25-903 states in part: "Any person who willfully or negligently interferes with the legal herding, grazing or pasturing of livestock . . . on an adjudicated allotment is guilty of a misdemeanor and additionally shall be subject to restitution under section 19-5304, Idaho Code." Western livestock producers have seen a consistent and dramatic erosion of the AUMs allotted to their permits, particularly over the last three decades, through the placement of AUMs into suspended use status. Suspended AUMs should only be suspended for a temporary period with the presumption that suspended AUMs will be returned to active status whenever the resource permits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	24	Subpart 4110 - Qualifications and Preference	Further, the Livestock Groups recommend that language be added to 4110.3, "Changes in grazing status" to accommodate the concerns stated in the above paragraph: "The authorized officer shall periodically review the level of active use specified in a grazing permit/lease and may make changes to the terms and conditions as needed to accomplish allotment objectives. The AO shall first determine if livestock grazing is the causal factor for not achieving allotment objectives based on long-term rangeland monitoring trends. If the current livestock grazing program is determined to be the causal factor, the AO shall first implement changes in the management program to include, but are not limited to, changes in seasons of use, duration and timing of use, or rangeland improvements to accomplish a trend towards achieving allotment objectives before reducing active AUM's. Any reductions in active use will be placed in suspension."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chandler	Britney			1160	3	Subpart 4110 - Qualifications and Preference	Fourth suspended use AUMs should be reinstated if there has been no issues for a period of time. Permits have been put in suspend use and never really looked at again. Ours were put in suspend use two previous owners before us. Many permits have had cattle on them for many years and that many cattle ran on them and the effects on the environment and the forage was known. To require additional studies is redundant as the history and impact is known.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	18	Subpart 4110 - Qualifications and Preference	Finally, if the AD ultimately reduces active AUMs, those AUMs should be converted to suspended use AUMs. A permanent reduction in Preference AUMs must not occur unless the Land Use Plan conveys that these AUMs are no longer available for livestock grazing and the AD makes a formal finding on the basis of long-term quantitative monitoring data that there is no "realistic expectation that the AUMs can be returned to active livestock use in the foreseeable future." See 60 Fed. Reg. 9931 (2/22/1995).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	17	Subpart 4110 - Qualifications and Preference	DCA believes that regulations should not obligate, nor should they have the appearance of obligating, BLM to impose an automatic decrease in AUMs. Instead, before the AD decreases active use because of an unacceptable level of use or exceeding carrying capacity, BLM should first be required to consider modifying management practices (e.g., rotation, duration, etc.) and not automatically reduce active AUMs. Reduction of active use AUMs should only occur: (1) after modification of management practices is first attempted as a solution; and (2) then if unsuccessful, active use AUMs will be reduced only in direct proportion to the quantity of inconsistent use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	14	Subpart 4110 - Qualifications and Preference	Changes in grazing status 43 CFR 4110.3 should be changed to reflect the above: OLD TEXT "The authorized officer shall periodically review the level of active use specified in a grazing permit/lease and may make changes to the terms and conditions as needed to accomplish allotment objectives. The AO shall first determine if livestock grazing is the causal factor for not achieving allotment objectives based on long-term rangeland monitoring trends. If the current livestock grazing program is determined to be the causal factor, the AO shall first implement changes in the management program to include, changes in seasons of use, duration and timing of use, or rangeland improvements to accomplish a trend towards achieving allotment objectives before reducing active AUM's. Any reductions in active use will be placed in suspension." NEW TEXT "The authorized officer shall periodically review the level of active use specified in a grazing permit/lease and may make changes to the terms and conditions as needed to accomplish allotment objectives. The AO shall first determine if livestock grazing is the causal factor for not achieving allotment objectives based on long-term rangeland monitoring trends. If the current livestock grazing program is determined to be the causal factor, the AO shall first implement changes in the management program to include, but not be limited to, changes in seasons of use, duration and timing of use, or rangeland improvements to accomplish a trend towards achieving allotment objectives before reducing active AUM's. Any reductions in active use will be placed in suspension." We support an Instruction Memo to all field offices to assess if rangeland management tools other than reductions in active AUMs will accomplish allotment objectives. BLM should document when other factors, such as fire, roads, wild horses, drought, or invasive species impact rangeland conditions. Changes to BLM management should address the cause of problems, not simply reduce livestock grazing. When grazing plays a role in problems, it is important to use appropriate management, not just reduce AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	22	Subpart 4110 - Qualifications and Preference	Base property requirements should be simplified Changing the base-property certification process to a self-certification process by the permittees would simplify the base process and increase efficiency.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cozzens	Paul	Iron County Commission	UT	1492	3	Subpart 4110 - Qualifications and Preference	AUM Preference or History -The permit should include the history of AUMs from the time of the allotment creation and include AUMs that are suspended or active. Suspended AUMs should include the reason suspended and if the AUMs have been diverted for other uses such as wild horses, sensitive wildlife species, big game, etc. Range Improvement Fund: Eliminate requirement to Consult Cooperate and Coordinate with the RAC on Range Improvement Projects. Impossible to coordinate with RAC on every project. Draws out decisions where, in many cases, the opportunity for range improvement is lost or delayed.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	18	Subpart 4110 - Qualifications and Preference	At Sec. 4110.2-1, Base property, please remove item (2) (b) because item (b) is a "commensurability" requirement that neither the BLM nor the WSGB has supported for many years as a criteria for what is, or is not, base property. The WSGB does not support this portion of the Base property Regulation, and we are advised that the local BLM AO's do not comply with part (2) (b) that requires the BLM to assess the capability of private lands to produce crops or forage when livestock authorized on a BLM grazing permit are not on the Federal lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	23	Subpart 4110 - Qualifications and Preference	At Sec. 4110.2-1, Base property, please remove item (2) (b) because item (b) is a "commensurability" requirement that neither the BLM nor the WSGB has supported for many years as a criteria for what is, or is not, base property. The WSGB does not support this portion of the Base property Regulation, and we are advised that the local BLM AO's do not comply with part (2) (b) that requires the BLM to assess the capability of private lands to produce crops or forage when livestock authorized on a BLM grazing permit are not on the Federal lands. At item (2) (c) in this section, please remove the existing language that an applicant shall certify to the AO that this base property meets the requirements under paragraphs (a) and (b) of this Section because there are NO REQUIREMENTS under (a) or (b) in 4110.2-1.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	12	Subpart 4110 - Qualifications and Preference	At present, the BLM is held to no science-based standard with respect to the information that the "authorized officer" can use to make grazing decisions. I think we all want to require science-based DATA as the basis for grazing decisions in the future. "Data acceptable to the authorized officer" must be removed from these Grazing Regs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	29	Subpart 4110 - Qualifications and Preference	At 4110.3-3, implementing reductions in "permitted use": Please change this title to "Implementing reductions in active use". Please also remove the "interested public" from those with whom the local BLM must consult in this section because the "interested public" are not professional range scientist and should not try to influence BLM professionals on the basis of a political point of view.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	28	Subpart 4110 - Qualifications and Preference	At 4110.3-2, Decreasing "permitted use": Please change the Title in this Section to "Decreasing active use". The WSGB comments that the Regulations at this section should be returned to the language that existed prior to RR reform 94 because the language in the BLM Grazing regulations before 2/22/95 more closely represented the range science state of the art positions on this subject. Reductions in active use must be based on science-based monitoring of whether or not allotment measurable objectives are being accomplished, over time. The WSGB also comments that the reference to Section 4180 should be removed from the BLM Grazing regulation at 4110.3-2 and at all other places in these Regulations. (See the WSGB comment at Section 4180)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	27	Subpart 4110 - Qualifications and Preference	At 4110.3-1- Increasing "permitted use". Please change this Title to "Increasing active use". At 4110.3-1, (c), please remove " and the interested public" from this paragraph because, in the opinion of the WSGB, with support language at Section 204 of the FLPMA, members of the "Interested public" do not have the professional training to be involved in the subjects in this paragraph. The "interested public" has the right to provide comments to the BLM on these subjects, but only "Affected citizens" should be granted the right to be directly involved with BLM Professionals on issues related to either increasing or decreasing active use.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	26	Subpart 4110 - Qualifications and Preference	At 4110.3, " Changes in Grazing Preference status: please remove the term, "data acceptable to the AO", and replace this phrase with " and science-based data as evidenced by rangeland studies conducted over time."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	24	Subpart 4110 - Qualifications and Preference	At 4110.2-2: Please replace the term "permitted use" in this Title with the word "preference". Also in (a), please replace the requirement that the ..."permitted livestock use be based on the amount of forage available for livestock grazing as established in the LUP," to " the level of preference recognized by the BLM shall be listed in the LUP for each Section 3 permittee. The WSGB justification for this comment is that the level of preference for each holder of a section 3 grazing permit should be shown in the LUP in order to document this subject in the LUP.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	21	Subpart 4110 - Qualifications and Preference	At 4110.1-1, the WSGB comments that the language currently at 4110.1-1 is not consistent with the direction at either Sections' 4110.3-1 or 4130.1-2. The WSGB recommends that language at 4110.1-1 convey that acquired lands within a grazing District be classified as Section 3 BLM lands and that the livestock carrying capacity be offered to existing permittees, or other qualified applicants per Section 4130.1-2. At 4130.1-2, please remove item (d) as recommended by the PLC and the WSGB.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	20	Subpart 4110 - Qualifications and Preference	At 4110.1 Mandatory qualifications, the WSGB recommends that this Section include the requirement that applicants must be engaged in the livestock business, as intended in the Taylor Grazing Act. The WSGB supports the language recommended by the PLC on this subject.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	30	Subpart 4110 - Qualifications and Preference	Also at 4110.3-3 (b), Please modify the last part of (b). The WSGB comments that Grazing decisions that adversely impact a Section 3 permittee that are not placed into Full Force and Effect, FFE, by the AO should be stayed during the appeal because a permittee appellant should not have to live under the terms and conditions under Appeal for the often very lengthy time it takes to adjudicate the issues in the appeal. Having to live under the terms and conditions during an Appeal often leads' to adverse economic consequences from which permittees cannot recover. An adverse grazing decision on a Section 3 permittee, placed in effect during an Appeal, is the same as being guilty before the permittee is actually found guilty.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	15	Subpart 4110 - Qualifications and Preference	8. The number of livestock authorized to graze on public land in Eureka County and Nevada has been reduced over the years and there has been an increase in unjustified and arbitrary restrictions of livestock grazing in certain areas due to subjective determinations of adverse impacts. We assert that the monitoring data and background information going into making these restrictive decisions is often based on flawed and/or subjective observations and is not based on current rangeland science. These grazing restrictions often place ranchers in an untenable position of not being able to provide for the needs of livestock at the right time of the year and, in some examples, these restrictions could be seen as a taking since the grazing season-of-use is not in line with the permitted use of the water right appurtenant to riparian areas. Since most of the prime and invaluable wildlife and riparian habitat in Eureka County is under private control, grazing restrictions placed upon the federally administered land only increases the possibility and occurrences of land degradation on private lands. The grazing regulations must avoid these arbitrary and subjective restrictions and impacts.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Waite	Anita M.	Big Sandy NRDC	AZ	1437	4	Subpart 4110 - Qualifications and Preference	43 C.F.R.4 4110.1 Mandatory qualifications. It is important, given the purpose of the Taylor Grazing Act, the establishment of grazing districts, and the Public Rangelands Improvement Act, that to qualify for grazing on public lands, the entity must own or control base property and actually graze livestock on the range to support a livestock business. Therefore, change the description of mandatory qualifications to include been engaged in the livestock business: ", 4110.1 Mandatory Qualifications. (a) Except as provided under §§ 4110.1-1, 4130.5 and 4130.6-3, to qualib, for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of livestock and will use the federal lands to graze livestock,
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	9	Subpart 4110 - Qualifications and Preference	43 C.F.R. § 4110.3-2(b) Decreasing active use. BLM has used rangeland heath determinations under Section 4180.2(c) and/or made land use plan objective determinations under Section 4100.0-8 or Section 4130.3-3 that unnecessarily reduced grazing. The grazing regulations should not obligate, nor imply, that BLM must impose automatic decreases in AUMs. Instead, Active use should be reduced only if other management practices (rotation, duration of deferment, improvement of distribution) do not work. Reduction of active use AUMs should only occur after modification of management practices fails to provide a solution and should only reduce AUMS to a level necessary to meet objectives with the implementation of the new practices. If quantitative data shows a need to reduce active AUMs, those AUMs should be held as suspended use AUMs. A permanent reduction in Preference AUMs must not occur unless the Land Use Plan conveys that these AUMs are no longer available for livestock grazing and the Authorized Officer makes a formal finding on the basis of long-term quantitative monitoring data that there is no "realistic expectation that the AUMs can be returned to active livestock use in the foreseeable future." See 60 Fed. Reg. 9931 (2/22/1995). "§ 4110.3-2 Decreasing Active Use (b) When monitoring trends show grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the domestic livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of excess grazing documented by quantitative monitoring. (c) Any decrease in active use shall be classified as suspended use.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	23	Subpart 4110 - Qualifications and Preference	43 C.F.R. § 4110.3-2(b) Decreasing active use. BLM has used rangeland heath determinations under Section 4180.2(c) and/or made land use plan objective determinations under Section 4100.0-8 or Section 4130.3-3 that unnecessarily reduced grazing. The grazing regulations should not obligate, nor imply, that BLM must impose automatic decreases in AUMs. Instead, Active use should be reduced only if other management practices (rotation, duration of deferment, improvement of distribution) do not work. Reduction of active use AUMs should only occur after modification of management practices fails to provide a solution and should only reduce AUMS to a level necessary to meet objectives with the implementation of the new practices. If quantitative data shows a need to reduce active AUMs, those AUMs should be held as suspended use AUMs. A permanent reduction in Preference AUMs must not occur unless the Land Use Plan conveys that these AUMs are no longer available for livestock grazing and the Authorized Officer makes a formal finding on the basis of long-term quantitative monitoring data that there is no "realistic expectation that the AUMs can be returned to active livestock use in the foreseeable future." See 60 Fed. Reg. 9931 (2/22/1995). "§ 4110.3-2 Decreasing Permitted Active Use (b) When monitoring trends show grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the domestic livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of excess grazing documented by quantitative monitoring. (c) Any decrease in active use shall be classified as suspended use.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	26	Subpart 4110 - Qualifications and Preference	is C.F.R. § 4110.3-2(b) Decreasing permitted use. BLM has a track record of making adverse rangeland heath determinations under Section 4180.2(c) and/or making adverse land use plan objective determinations under Section 4100.0-8 or Section 4130.3-3. Based upon these determinations, BLM then decreases permitted AUMs under Section 4110.3-2(b) without quantifying the decrease. This is particularly occurring when BLM is attempting to rationalize any decrease in Permitted Use based upon two of the three conditions, i.e. Subpart 4180 and Utilization Patterns, in section 4110.3-2(b) which do not, in and-of-themselves, quantify grazing capacity and the associated decrease in Permitted Use AUMs. PLC and CCA believe that BLM should not be obligated to impose an automatic decrease in AUMs. Instead, before the authorized officer decreases active use because of an unacceptable level of use or exceeding carrying capacity, BLM should first be required to consider modifying management practices (e.g., rotation, duration, etc.) and not automatically reduce active AUMs. Reduction of active use AUMs should only occur: (1) after modification of management practices is first attempted as a solution; and (2) then if unsuccessful, active use AUMs will be reduced only in direct proportion to the quantity of inconsistent use. Finally, if the authorized officer ultimately reduces active AUMs, those AUMs should be converted to suspended use AUMs. A permanent reduction in Preference AUMs cannot occur unless the Land Use Plan conveys that these AUM's are no longer available for livestock grazing and the authorized officer makes a formal finding on the basis of long-term quantitative monitoring data that there is no "realistic expectation that the AUMs can be returned to active livestock use in the foreseeable future." See 60 Fed. Reg. 9931 (2/22/1995). "§ 4110.3-2 Decreasing "Permitted" Use (b) When monitoring shows grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of the inconsistent use or carrying capacity. Any adverse determination that results in the nonrenewal of a grazing permit/lease only results in the nonrenewal of the grazing permit/lease, and not the cancellation of the preference which shall remain attached to the base property and be available through application and transfer to the new owner or lessee of the base property, or transferred to other qualified base

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	13	Subpart 4110 - Qualifications and Preference	43 C.F.R. § 4110.3-2(b) Decreasing permitted use: The Livestock Groups note that BLM has, in a number of cases, made adverse rangeland health determinations under Section 4180.2(c) and/or has made adverse land use plan objective determinations under Section 4100.0-8 or Section 4130.3-3. Historically, the BLM has used these adverse determinations to justify decreasing permitted AUMs under Section 4110.3-2(b) without quantifying the decrease. This occurs most frequently when BLM is attempting to rationalize any decrease in Permitted Use based upon two of the three conditions, i.e. Subpart 4180 and Utilization Patterns, in Section 4110.3-2(b) which do not, in-and-of-themselves, quantify grazing capacity and the associated decrease in Permitted Use AUMs. The Livestock Groups believe that regulations should not obligate, nor should they have the appearance of obligating, BLM to impose an automatic decrease in AUMs. Instead, before the AO decreases active use because of an unacceptable level of use or exceeding carrying capacity, BLM should first be required to consider modifying management practices (e.g., rotation, duration, etc.) and not automatically reduce active AUMs. Reduction of active use AUMs should only occur: (1) after modification of management practices is first attempted as a solution; and (2) then if unsuccessful, active use AUMs will be reduced only in direct proportion to the quantity of inconsistent use. Finally, if the AO ultimately reduces active AUMs, those AUMs should be converted to suspended use AUMs. A permanent reduction in Preference AUMs must not occur unless the Land Use Plan conveys that these AUMs are no longer available for livestock grazing and the AO makes a formal finding on the basis of long-term quantitative monitoring data that there is no "realistic expectation that the AUMs can be returned to active livestock use in the foreseeable future." See 60 Fed. Reg. 9931 (2/22/1995). "§ 4110.3-2 Decreasing "Permitted" Use (b) When monitoring trends show grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the domestic livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of the inconsistent use or carrying capacity. Any adverse determination that results in the nonrenewal of a grazing permit/lease only results in the nonrenewal of the grazing permit/lease, and not the cancellation of the preference which shall remain attached to the base property and be available through application
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	12	Subpart 4110 - Qualifications and Preference	43 C.F.R. § 4110.3-2(b) Quantification of AUM Decreases/Carrying Capacity BLM should determine carrying capacity before reducing permitted AUMS. It is currently the case that often, BLM is making adverse rangeland health determinations under Section 4180.2(c) and/or making adverse land use plan objective determinations under Section 4100.0-8 or Section 4130.3-3. Based upon these determinations, BLM then decreases Permitted Use AUMs under Section 4110.3-2(b) without quantifying the decrease. This is particularly occurring when BLM is attempting to rationalize any decrease in Permitted Use based upon two of the three conditions, i.e. Subpart 4180 and Utilization Patterns, in section 4110.3-2(b) which don't, in-and-of-themselves, quantify grazing capacity and the associated decrease in Permitted Use AUMs. Further, any decrease in active use should be classified as suspended use, not permanently cancelled.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	11	Subpart 4110 - Qualifications and Preference	43 C.F.R. § 4110.1(a) Mandatory Qualifications The revised regulations should include a requirement that a permittee must be actively engaged in the livestock business and intend to use the permitted allotments as part of their livestock operation.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	27	Subpart 4110 - Qualifications and Preference	43 C.F.R. § 4110.1 Mandatory qualifications. Given the purpose of the Taylor Grazing Act and the Public Rangelands Improvement Act, that to qualify for grazing on public lands, the entity must own or control base property and actually graze livestock on the range to support a livestock business. Therefore, change the description of mandatory qualifications to include being engaged in the livestock business: "§ 4110.1 Mandatory Qualifications. (a) Except as provided under §§ 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be...."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	8	Subpart 4110 - Qualifications and Preference	43 C.F.R. § 4110.1 Mandatory qualifications. The Taylor Grazing Act, grazing districts, and Public Rangelands Improvement Act all require that grazing permits be issued to entities that own or control base property and actually graze livestock on the range. The regulations should be amended to require that a permittee must be actively engaged in the livestock business and intend to use the permitted allotments to graze livestock: "§ 4110.1 Mandatory Qualifications. (a) Except as provided under §§ 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be..."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	11	Subpart 4110 - Qualifications and Preference	43 C.F.R. § 4110.1 Mandatory qualifications. The Taylor Grazing Act, grazing districts, and Public Rangelands Improvement Act all require that grazing permits be issued to entities that own or control base property and actually graze livestock on the range. The regulations should be amended to require that a permittee must be actively engaged in the livestock business and intend to use the permitted allotments to graze livestock: "§ 4110.1 Mandatory Qualifications. (a) Except as provided under §§ 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be..."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	22	Subpart 4110 - Qualifications and Preference	43 C.F.R. § 4110.1 Mandatory qualifications. The Taylor Grazing Act, grazing districts, and Public Rangelands Improvement Act all require that grazing permits be issued to entities that own or control base property and actually graze livestock on the range. The regulations should be amended to require that a permittee must be actively engaged in the livestock business and intend to use the permitted allotments to graze livestock: "§ 4110.1 Mandatory Qualifications. (a) Except as provided under §§ 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be..."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	11	Subpart 4110 - Qualifications and Preference	43 C.F.R. § 4110.1 Mandatory qualifications. The Taylor Grazing Act, grazing districts, and Public Rangelands Improvement Act all require that grazing permits be issued to entities that own or control base property and actually graze livestock on the range. The regulations should be amended to require that a permittee must be actively engaged in the livestock business and intend to use the permitted allotments to graze livestock: "§ 4110.1 Mandatory Qualifications. OLD TEXT: (a) Except as provided under §§4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, and must be: COMMENTER'S RECOMMENDED NEW TEXT: (a) Except as provided under §§ 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be..."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miyamoto	Doug	Wyoming Department of Agriculture	WY	910	3	Subpart 4110 - Qualifications and Preference	4110.4-2 Decreased Land acreage -We urge the BLM update and clarify the disposal and devotion of public lands to other purposes. We are concerned the rise In new land designations and public Interest to remove livestock grazing will negatively Impact our Industry. Additionally, we believe NEPA should analyze the actions prior to any disposal, devotion to other purposes, or proposed allotment closures.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	18	Subpart 4110 - Qualifications and Preference	4110.3-1 Increasing permitted use - Any increase in permitted use up to the historic preference AUMs should be done by CAT EX. As grazing on these lands has occurred for more than 100 years, the environmental impact is known. There is no need for any additional studies. Every allotment has had multiple EAs and/or EISs prepared previously. At the very least, a Determination of NEPA Adequacy should be made specifying that NEPA has been conducted and is adequate to provide the information necessary to make an informed decision. Range Conservation Officers are authorized to assess range conditions and to increase stocking rates based upon forage availability and progress towards meeting rangeland health goals. Stocking rates will not exceed carrying capacity of the allotment. BLM should only require an EA when historic preference AUM numbers are proposed to be exceeded. Furthermore, increasing permitted use would not likely qualify as a "major federal action" under the current CEQ definition of such for which NEPA analysis is required. It would be even less likely to qualify under the newly proposed definition of a major federal action which is being considered currently in the NEPA reform process. Therefore, for a variety of reasons, additional NEPA should not be required to increase permitted use up to historic numbers.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miyamoto	Doug	Wyoming Department of Agriculture	WY	910	2	Subpart 4110 - Qualifications and Preference	4110.2-3 - Transfer of Grazing Preference -We support the streamlining of the permit and lease renewal process and reduction of staff workload by making transfer of a grazing preference to another permlttee/lessee an Administrative DecIsion. We support the ability of the authorized officer to make these decisions administratively and be effective Immediately and not subject to the Proposed DecIsion and Protest process.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ure	Amy			1352	4	Subpart 4110 - Qualifications and Preference	3), When abundance of feed is available, grazing regulations should provide for additional livestock use. This could be accomplished from allowing increased numbers or duration of grazing season. Preference should be given to those permittees with suspended AUM's. 4), When there is a five-year documented trend of increased rangeland health, suspended AUM's should be returned to Active status in proportion to the documented percentage increase in each year following the five-year trend establishment. Once all suspended numbers are returned to active status, wildlife increases should be supported also to the degree rangeland health continues at stable and upward trending.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Meeks	Shari	Sublette County Conservation District	WY	1353	2	Subpart 4110 - Qualifications and Preference	§4110.3-2(b) Decreasing active use. BLM grazing regulations should be revised to require that any decreases in permitted use should be based on quantitative monitoring data, not mere "field observations" or qualitative assessments. If monitoring shows unacceptable patterns of use rather than excessive use levels, changes to grazing distribution should be implemented to try and remedy the situation before any decreases in permitted use are imposed. When active use AUM's are decreased because carrying capacity is being exceeded and use levels are excessive, or because efforts to address unacceptable patterns of use through other management adjustments are unsuccessful, the decreased active AUM's should be converted to suspended use AUM's. Current regulation states "(a) The authorized officer may suspend active use in whole or in part on a temporary basis due to reasons specified in §4110.3-3(b)(1), or to facilitate installation , maintenance, or modification of range improvements. (b) When monitoring or documented field observations show grazing use or patterns of use are not consistent with the provisions of subpart 4180 of this part, or grazing use is otherwise causing an unacceptable level or pattern of utilization, or when use exceeds the livestock carrying capacity as determined through monitoring, ecological site inventory, or other acceptable methods, the authorized officer will reduce active use, otherwise modify management practices, or both. To implement reductions under this paragraph, BLM will suspend active use." SCCD offers the following changes as it pertains to (b) "When quantitative monitoring show grazing use or patterns of use are not consistent with the provisions of subpart 4180 of this part, or grazing use is otherwise causing an unacceptable level or pattern of utilization, or when use exceeds the livestock carrying capacity as determined through quantitative monitoring , the authorized officer shall first try to remedy the situation through the modification of grazing distribution. Should grazing management modification efforts be unsuccessful , then the authorized officer will reduce active use and convert reduced AUM's to suspended AUM 's."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Johnson	Roger			1234	1	Subpart 4110 - Qualifications and Preference	§ 4110.3-1 Increasing active use. When monitoring or documented field observations show that additional forage is available for livestock grazing, (or livestock can be used to control invasive species, fire fuel or improve habitat for desired species) either on a temporary or sustained yield basis, BLM may apportion additional forage to qualified applicants for livestock grazing use consistent with multiple-use management objectives specified in the applicable land use plan.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	ortega	adam	Colorado Department of Agriculture	CO	981	7	Subpart 4110 - Qualifications and Preference	§ 4110.3 Changes in permitted use. These changes must be supported by monitoring, field observations, ecological site inventory or other data acceptable to the authorized officer. Site specific quantitative monitoring is the best available science that should inform decisions regarding changes in permitted use. As stated above, CDA requests addition of the word "quantitative" and a clarifying definition of field observations.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallidge	Samuel		NM	1319	9	Subpart 4110 - Qualifications and Preference	§ 4110.3 Changes in permitted use Changes to permitted use should be based on data collected in a scientifically defensible manner. We recommend removal of field observations as the term is inclusive with our recommended changes. We recommend deletion of ecological site inventory (ESI) in relation to changes in permitted use. While ESIs and resultant site descriptions are conceptually appealing, they have not been validated to a point of operational maturity useful for informing real-time management decisions. We recommend removing deference to the authorized officer in determining what data is acceptable as it places an undue burden on the officer to evaluate data quality that is better placed on group of qualified individuals. OLD TEXT The authorized officer shall periodically review the permitted use specified in a grazing permit or lease and shall make changes in the permitted use as needed to manage, maintain or improve rangeland productivity, to assist in restoring ecosystems to properly functioning condition, to or conform with land use plans or activity plans, or to comply with the provisions of subpart 4180 of this part. These changes must be supported by monitoring data field observations, ecological site inventory or other data acceptable to the authorized officer. NEW TEXT The authorized officer shall periodically review the permitted use specified in a grazing permit or lease and shall make changes in the permitted use as needed to manage, maintain or improve rangeland productivity, to assist in restoring ecosystems, to or conform with land use plans, or to comply with the provisions of subpart 4180 of this part. These changes must be supported by monitoring data collected using scientifically defensible methods appropriate for reliably informing decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Oxarango	Rochelle		ID	889	3	Subpart 4110 - Qualifications and Preference	* 4110.3-2(b) - Quantification of AUM Decreases/Carrying Capacity BLM should determine carrying capacity before reducing permitted AUMS

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	53	Subpart 4110 - Qualifications and Preference	(a) After consultation, coordination and cooperation with the affected permittee or lessee, the State have lands or managing resources within the area, and the interested public, reduction of permitted use shall be implemented through a document agreement or by decision of the authorized officer. Decisions implementing §4110.3-2 shall be issued as proposed decisions pursuant to §4160.1 of this part, except as provided in paragraph (b) of this section. Proposed text: (a) After consultation, coordination and cooperation with the affected permittee or lessee, and the State have lands or managing resources within the area and reduction of active use shall be implemented though a documented agreement or by decisions of the officer. Decisions implementing §4110.3-2 shall be issued as proposed decisions pursuant to §4160.1 of this part, except as provided in paragraph (b) of this section. Original text: (b) When the authorized officer determines that the soil, vegetation, or other resources on the public lands require immediate protection because of conditions such as drought, fire, flood, or insect infestation, or when continued grazing use poses a significant risk of resource damage, after consultation with, or a reasonable attempt to consult with, affected permittees or lessees, the interested area, the authorized office, shall close allotments or portions of allotments to grazing by any kind of livestock or modify authorized grazing use notwithstanding the provisions of paragraph 410.3 3(a) of this section. Proposed text: b) When the authorized officer determines that the level of active use by livestock is not contributing to achievement of allotment management plan and/or allotment objectives that have been develop in close consultation, cooperation and coordination with the permittee(s) or lessee(s), the authorized officer determines the soil, vegetation, or other resources on the public lands require temporary protection because of conditions such as drought, fire, flood, or insect infestation, or when continued grazing use poses a significant risk of resource damage, after consultation with, or a reasonable attempt to consult with, affected permittees or lessees, action shall address grazing by any kind of livestock or modify active grazing use, notwithstanding the provisions of 4110.3-2(a) of this section. Notices or decisions requiring modification of livestock active grazing use may be issued as a final decision. Changes in active use over 10% shall be implemented over a 5 year period, unless after consultation with the affected permittee(s) or lessee(s) an agreement is reached to implement the decrease in less than 5 years or the decision shall be issued in "full force and effect." Notices of closure and decisions requiring modification of authorized active use may be issued as final decisions effective upon issuance or on the date specified in the decision. Such decisions shall remain in effect pending the
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kershner	Bryce		OR	1042	2	Subpart 4110 - Qualifications and Preference	"Permitted use" - Remove this term from the regs and replace it with "preference". Preference is our right and was recognized by the Supreme Court when PLC challenged the regs. "Conservation Use" - This term should be taken out of the regs. (conservation is in the eye if the beholder and can be different with each specific instance. Grazing could be determined conservation in the right plan)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	4	Subpart 4110 - Qualifications and Preference	"Permitted use" - Remove the term from the regulations. The term "preference" should replace the term "permitted use" everywhere that it is now being used.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	13	Subpart 4110 - Qualifications and Preference	"Consultation, cooperation, and coordination" - The definition should be returned to BLM's pre-1994 grazing regulations to maintain consistency with the language in the Federal Land Policy and Management Act (FLPMA). Collectively, these activities require consistent and robust participation by affected permittees or lessees. The regulation should read: "Consultation, cooperation and coordination means an interactive process for seeking advice, agreement, or interchange of opinions on issues, plans, or management actions from other agencies and effected permittees or lessees, landowners involved, the district grazing advisory boards where established, any state having lands within the area to be covered by an allotment management plan and other affected interests."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	14	Subpart 4110 - Qualifications and Preference	"§ 4110.3-2 Decreasing Permitted Active Use (b) When monitoring trends show grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the domestic livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of excess grazing documented by quantitative monitoring. (c) Any decrease in active use shall be classified as suspended use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	19	Subpart 4110 - Qualifications and Preference	"§ 4110.3-2 Decreasing "Permitted" Use (b) When monitoring trends show grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the domestic livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity. Modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives. then the authorized officer may reduce active use in direct proportion to the quantity of the inconsistent use or carrying capacity. Any adverse determination that results in the nonrenewal of a grazing permit/lease only results in the nonrenewal of the grazing permit/lease, and not the cancellation of the preference which shall remain attached to the base property and be available through application and transfer to the new owner or lessee of the base property, ar transferred to other qualified base property if the permittee/lessee whose permit/lease was canceled for cause continues to own the original base property. (c) Any decrease in active use shall be classified as suspended use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	2	Subpart 4110 - Qualifications and Preference	OLD TEXT 4110.3 Changes in permitted use. 4110.3-1 Increasing permitted use. 4110.3-2 Decreasing permitted use. 4110.3-3 Implementing reductions in per-mitted use. NEW TEXT 4110.3 Changes in active use. 4110.3-1 Increasing active use. 4110.3-2 Decreasing active use. 4110.3-3 Implementation of reductions in active . RATIONALE NONE GIVEN

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	47	Subpart 4110 - Qualifications and Preference	OLD TEXT § 4110.4-1 Additional land acreage. When lands outside designated allotments become available for livestock grazing under the administration of the Bureau of Land Management, the forage available for livestock shall be made available to qualified applicants at the discretion of the authorized officer. Grazing use shall be apportioned under § 4130.1-2 of this title. NEW TEXT § 4110.4-1 Additional land acreage. When lands outside designated allotments become available for livestock grazing under the administration of the Bureau of Land Management, the CARRY CAPACITY available for livestock shall be made available to qualified applicants. Grazing use shall be apportioned under § 4130.1-2 of this title. (b)When lands inside designated allotments become available for livestock grazing under the administration of the Bureau of Land Management, the carry capacity available for livestock shall be made available to the permittee(s) or lease(s) in the allotment. Grazing use shall be apportioned under § 4110.31(b) or 4110.31(c) of this title. RATIONALE Comment [AS25]: These proposed amendments clarify the distinction between additional acres available outside of an allotment and additional acres inside of an allotment.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	45	Subpart 4110 - Qualifications and Preference	OLD TEXT § 4110.3-3 Implementing reductions in permitted use. (a) After consultation, cooperation, and coordination with the affected permittee or lessee, the State having lands or managing resources within the area, and the interested public, reductions of permitted use shall be implemented through a documented agreement or by decision of the authorized officer. Decisions implementing § 4110.3-2 shall be issued as proposed decisions pursuant to § 4160.1, except as provided in paragraph (b) of this section. NEW TEXT § 4110.3-3 Implementing reductions in Active use or modifications in terms and conditions. (a) After consultation, cooperation, and coordination with the affected permittee or lessee, the State having lands or managing resources within the area, and the interested public, reductions of Active use shall be implemented through a documented agreement or by decision of the authorized officer. Decisions implementing § 4110.3-2 shall be issued as proposed decisions pursuant to § 4160.1, except as provided in paragraph (b) of this section. RATIONALE See insertions and deletions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	27	Subpart 4110 - Qualifications and Preference	OLD TEXT (c) After consultation, cooperation, and coordination with the affected permittees or lessees, the State having lands or managing resources within the area, and the interested public, additional forage on a sustained yield basis available for livestock grazing use in an allotment may be apportioned to permittees or lessees or other applicants, provided the permittee, lessee, or other applicant is found to be qualified under subpart 4110 of this part. Additional forage shall be apportioned in the following priority: NEW TEXT (c) After consultation, cooperation, and coordination with the affected permittees or lessees, the State having lands or managing resources within the area, additional forage on a sustained yield basis available for livestock grazing use in an allotment may be apportioned to permittees or lessees or other applicants, provided the permittee, lessee, or other applicant is found to be qualified under subpart 4110 of this part. Additional forage shall be apportioned in the following priority: RATIONALE Interested public should not be included in "consultation, cooperation, and coordination", they don't have an affected interest.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	46	Subpart 4110 - Qualifications and Preference	OLD TEXT (b) When the authorized officer determines that the soil, vegetation, or other resources on the public lands require immediate protection because of conditions such as drought, fire, flood, insect infestation, or when continued grazing use poses an imminent likelihood of significant resource damage, after consultation with, or a reasonable attempt to consult with, affected permittees or lessees, the interested public, and the State having lands or responsible for managing resources within the area, the authorized officer shall close allotments or portions of allotments to grazing by any kind of livestock or modify authorized grazing use notwithstanding the provisions of paragraph (a) of this section. Notices of closure and decisions requiring modification of authorized grazing use may be issued as final decisions effective upon issuance or on the date specified in the decision. Such decisions shall remain in effect pending the decision on appeal unless a stay is granted by the Office of Hearings and Appeals in accordance with 43 CFR 4.21. NEW TEXT (b) When the authorized officer determines that the soil, vegetation, or other resources on the public lands require immediate protection because of conditions such as drought, fire, flood, insect infestation, or when continued grazing use poses an imminent likelihood of significant resource damage, after consultation with, or a reasonable attempt to consult with, affected permittees or lessees, the interested public, and the State having lands or responsible for managing resources within the area, the authorized officer shall close allotments or portions of allotments to grazing by any kind of livestock or modify TERMS AND CONDITIONS OF authorized grazing use, OR TEMPORARILY REDUCE ACTIVE USE, notwithstanding the provisions of paragraph (a) of this section. DECISIONS REQUIRING closure ____ modification of authorized grazing use, OR TEMPORARY REDUCTIONS IN ACTIVE USE may be issued as final decisions effective upon issuance or on the date specified in the decision. Such decisions shall remain in effect pending the decision on appeal unless a stay is granted by the Office of Hearings and Appeals in accordance with 43 CFR 4.21. RATIONALE See insertions and deletions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	37	Subpart 4110 - Qualifications and Preference	OLD TEXT (b) The permitted use specified shall attach to the base property supporting the grazing permit or grazing lease. NEW TEXT (b) The Grazing preference specified shall attach to the base property supporting the grazing permit or grazing lease. RATIONALE See insertions and deletions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	38	Subpart 4110 - Qualifications and Preference	OLD TEXT (b) If base property is sold or leased, the transferee shall within 90 days of the date of sale or lease file with the authorized officer a properly executed transfer application showing the base property and the amount of permitted use being transferred in animal unit months. NEW TEXT (b) If base property is sold or leased, the transferee shall within 90 days of the date of sale or lease file with the authorized officer a properly executed transfer application showing the base property and the amount of Grazing preference being transferred in animal unit months. RATIONALE See insertions and deletions

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	25	Subpart 4110 - Qualifications and Preference	<p>OLD TEXT (a) Permitted use is granted to hold-ers of grazing preference and shall be specified in all grazing permits and leases. Permitted use shall encompass all authorized use including livestock use, any suspended use, and conserva-tion use, except for permits and leases for designated ephemeral rangelands where livestock use is authorized based upon forage availability, or designated annual rangelands. Permitted live-stock use shall be based upon the amount of forage available for live-stock grazing as established in the land use plan, activity plan, or decision of the authorized officer under § 4110.3-3, except, in the case of designated ephemeral or annual rangelands, a land use plan or activity plan may alter-natively prescribe vegetation standards to be met in the use of such range-lands. (b) The permitted use specified shall attach to the base property supporting the grazing permit or grazing lease. NEW TEXT (a) Permitted use is granted to holders of grazing preference and shall be specified in all grazing permits and leases. Permitted use shall encompass all authorized use including livestock use, any suspended use, and , except for permits and leases for designated ephemeral rangelands where livestock use is authorized based upon forage availability, or designated annual rangelands. Permitted livestock use shall be based upon the amount of forage available for livestock grazing as established in the land use plan, activity plan, or decision of the authorized officer under § 4110.3-3, except, in the case of designated ephemeral or annual rangelands, a land use plan or activity plan may alternatively prescribe vegetation standards to be met in the use of such rangelands. (b) The permitted use specified shall attach to the base property supporting the grazing permit or grazing lease. RATIONALE The definition of "Grazing preference or preference means a superior or priority position against others for the purpose of receiving a grazing permit or lease. This priority is attached to base property owned or controlled by the permittee or lessee." Now it appears that "permitted use" is attached to base property. If permitted use is attached to base property shouldn't that be included in the definition of grazing preference?</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	30	Subpart 4110 - Qualifications and Preference	OLD TEXT (a) After consultation, cooperation, and coordination with the affected permittee or lessee, the State having lands or managing resources within the area, and the interested public, reductions of permitted use shall be implemented through a documented agreement or by decision of the authorized officer. Decisions implementing § 4110.3-2 shall be issued as proposed decisions pursuant to § 4160.1, except as provided in paragraph (b) of this section. (b) When the authorized officer determines that the soil, vegetation, or other resources on the public lands require immediate protection because of conditions such as drought, fire, flood, insect infestation, or when continued grazing use poses an imminent likelihood of significant resource damage, after consultation with, or a reasonable attempt to consult with, affected permittees or lessees, the interested public, and the State having lands or responsible for managing resources within the area, the authorized officer shall close allotments or portions of allotments to grazing by any kind of livestock or modify authorized grazing use notwithstanding the provisions of paragraph (a) of this section. Notices of closure and decisions requiring modification of authorized grazing use may be issued as final decisions effective upon issuance or on the date specified in the decision. Such decisions shall remain in effect pending the decision on appeal unless a stay is granted by the Office of Hearings and Appeals in accordance with 43 CFR 4.21. NEW TEXT § 4110.3-3 Implementing reductions in permitted use. (a) After consultation, cooperation, and coordination with the affected permittee or lessee, the State having lands or managing resources within the area, reductions of permitted use shall be implemented through a documented agreement or by decision of the authorized officer. Decisions implementing § 4110.3-2 shall be issued as proposed decisions pursuant to § 4160.1, except as provided in paragraph (b) of this section. (b) When the authorized officer determines that the soil, vegetation, or other resources on the public lands require immediate protection because of conditions such as drought, fire, flood, insect infestation, or when continued grazing use poses an imminent likelihood of significant resource damage, after consultation with, or a reasonable attempt to consult with, affected permittees or lessees, and the State having lands or responsible for managing resources within the area, the authorized officer shall close allotments or portions of allotments to grazing by any kind of livestock or modify authorized grazing use notwithstanding the provisions of paragraph (a) of this section. Notices of closure and decisions requiring modification of authorized grazing use may be issued as final decisions effective upon issuance or on the date specified in the decision. Such decisions shall remain in effect pending the decision on
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	28	Subpart 4110 - Qualifications and Preference	OLD TEXT (2) Permittee(s) or lessee(s) in proportion to the amount of their permitted use; and NEW TEXT (2) Permittee(s) or lessee(s) in proportion to the amount of their adjudicated preference use; and RATIONALE After decades of management and investment into these allotments the permittee(s) or lessee(s) that have grazing preference should be entitled to any increase in permitted use, at least back to the previous adjudicated preference numbers.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	24	Subpart 4110 - Qualifications and Preference	OLD TEXT (2) New permit or lease. Applicants for new permits or leases, and any affili-ates, shall be deemed not to have a record of satisfactory performance when- (i) The applicant or affiliate has had any Federal grazing permit or lease cancelled for violation of the permit or lease within the 36 calendar months immediately preceding the date of ap-plication; or (ii) The applicant or affiliate has had any State grazing permit or lease, for lands within the grazing allotment for which a Federal permit or lease is sought, cancelled for violation of the permit or lease within the 36 calendar months immediately preceding the date of application; or (iii) The applicant or affiliate is barred from holding a Federal grazing permit or lease by order of a court of competent jurisdiction. (c) In determining whether affiliation exists, the authorized officer shall con-sider all appropriate factors, including, but not limited to, common ownership, common management, identity of in-terests among family members, and contractual relationships. NEW TEXT (2) New permit or lease. Applicants for new permits or leases, and any affiliates, shall be deemed not to have a record of satisfactory performance when- (i) The applicant has had any Federal grazing permit or lease cancelled for violation of the permit or lease within the 36 calendar months immediately preceding the date of application; or (ii) The applicant has had any State grazing permit or lease, for lands within the grazing allotment for which a Federal permit or lease is sought, cancelled for violation of the permit or lease within the 36 calendar months immediately preceding the date of application; or (iii) The applicant is barred from holding a Federal grazing permit or lease by order of a court of competent jurisdiction.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	34	Subpart 4110 - Qualifications and Preference	OLD TEXT (1) Renewal of permit or lease. (i) The applicant for renewal of a grazing permit or lease, and any affiliate, shall be deemed to have a satisfactory record of performance if the authorized officer determines the applicant and affiliates to be in substantial compliance with the terms and conditions of the existing Federal grazing permit or lease for which renewal is sought, and with the rules and regulations applicable to the permit or lease. NEW TEXT the applicant for renewal of a grazing permit or lease, and any affiliate, shall be deemed to have a satisfactory record of performance if the authorized officer determines the applicant and affiliates to be in substantial compliance with the terms and conditions of the existing Federal grazing permit or lease for which renewal is sought, and with the rules and regulations applicable to the permit or lease. Any determination must be based upon previous adjudicated claims of noncompliance or upon claims of noncompliance that would be subject to adjudication either before or simultaneously with making the determination. Any adverse determination that results in the nonrenewal of the expiring grazing permit only results in the nonrenewal of the Grazing Permit, and not the cancellation of the Grazing Preference which shall remain attached to the base property and be available through application and transfer procedures at 43 C.F.R. 4110.23 to the owner or controller of the base property that can qualify for a grazing permit. Any cancellation of Preference shall only occur as part of Subpart 4170. RATIONALE Comment [AS19]: This clarification is warranted for two reasons: First, any substantial compliance must be based upon adjudicated noncompliance or must provide a process for the permittee /lessee to adjudicate the claimed noncompliance so that BLM conforms with the due process in Subpart 4160. See Hanley Ranch Partnership v. BLM, 183 IBLA 184, 197 (Footnote 18), 199202 (2013). Second, the rule should negate the claim that "the preference disappears at the same moment the permit disappears" upon a nonrenewal under 4110.1(b), as recently (and erroneously) concluded by Corrigan v. Bernhardt, 1:18CV512BLM, Document #41 (U.S. District Court, District of Idaho) (2020). See Document #41 at page 7. A preference should only be allowed to "disappear" or otherwise be defacto cancelled based upon subpart 4170, not merely upon a nonrenewal of a grazing permit. The Grazing preference should remain attached to the base property and be available for transfer under 43 C.F.R. § 4110.23 unless cancelled under 4170, or unless otherwise cancelled by the Secretary under 43 C.F.R. § 4110.23, see43 C.F.R. §4110.23(g), or under 43 C.F.R. § 4110.42(b).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	23	Subpart 4110 - Qualifications and Preference	OLD TEXT (1) Renewal of permit or lease. (i) The applicant for renewal of a grazing per-mit or lease, and any affiliate, shall be deemed to have a satisfactory record of performance if the authorized officer determines the applicant and affiliates to be in substantial compliance with the terms and conditions of the exist-ing Federal grazing permit or lease for which renewal is sought, and with the rules and regulations applicable to the permit or lease. NEW TEXT (1) Renewal of permit or lease. (i) The applicant for renewal of a grazing permit or lease, , shall be deemed to have a satisfactory record of performance if the authorized officer determines the applicant to be in substantial compliance with the terms and conditions of the existing Federal grazing permit or lease for which renewal is sought, and with the rules and regulations applicable to the permit or lease. RATIONALE See comment under the definition of affiliates.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	48	Subpart 4110 - Qualifications and Preference	OLD TEXT (1) Grazing permits or leases may be cancelled or modified as appropriate to reflect the changed area of use. (2) Permitted use may be cancelled in whole or in part. Cancellations determined by the authorized officer to be necessary to protect the public lands will be apportioned by the authorized officer based upon the level of available forage and the magnitude of the change in public land acreage available, or as agreed to among the authorized users and the authorized officer. NEW TEXT (1) Grazing permits or leases may be cancelled or modified as appropriate to reflect the changed area of use. IF THE ENTIRE GRAZING PERMIT OR LEASE IS CANCELLED, THEN THE GRAZING PREFERENCE SHALL BE CANCELLED TOO. (2) ACTIVE use may be cancelled in whole or in part. Cancellations determined by the authorized officer to be necessary to protect the public lands will be apportioned by the authorized officer based upon the level of available forage and the magnitude of the change in public land acreage available, or as agreed to among the authorized users and the authorized officer. RATIONALE See insertions and deletions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Dearing Ranch		1311	8	Subpart 4110 - Qualifications and Preference	43 C.F.R. § 4110.3-2(b) Decreasing active use. BLM has used rangeland health determinations under Section 4180.2(c) and/or made land use plan objective determinations under Section 4100.0-8 or Section 4130.3-3 that unnecessarily reduced grazing. The grazing regulations should not obligate, nor imply, that BLM must impose automatic decreases in AUMs. Instead, Active use should be reduced only if other management practices (rotation, duration of deferment, improvement of distribution) do not work. Reduction of active use AUMs should only occur after modification of management practices fails to provide a solution and should only reduce AUMS to a level necessary to meet objectives with the implementation of the new practices. If quantitative data shows a need to reduce active AUMs, those AUMs should be held as suspended use AUMs. A permanent reduction in Preference AUMs must not occur unless the Land Use Plan conveys that these AUMs are no longer available for livestock grazing and the Authorized Officer makes a formal finding on the basis of long-term quantitative monitoring data that there is no "realistic expectation that the AUMs can be returned to active livestock use in the foreseeable future." See 60 Fed. Reg. 9931 (2/22/1995). "§ 4110.3-2 Decreasing Permitted Active Use (b) When monitoring trends show grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the domestic livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of excess grazing documented by quantitative monitoring. (c) Any decrease in active use shall be classified as suspended use.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	12	Subpart 4110 - Qualifications and Preference	43 C.F.R. § 4110.3-2(b) Decreasing active use. BLM has used rangeland heath determinations under Section 4180.2(c) and/or made land use plan objective determinations under Section 4100.0-8 or Section 4130.3-3 that unnecessarily reduced grazing. The grazing regulations should not obligate, nor imply, that BLM must impose automatic decreases in AUMs. Instead, Active use should be reduced only if other management practices (rotation, duration of deferment, improvement of distribution) do not work. Reduction of active use AUMs should only occur after modification of management practices fails to provide a solution and should only reduce AUMS to a level necessary to meet objectives with the implementation of the new practices. If quantitative data shows a need to reduce active AUMs, those AUMs should be held as suspended use AUMs. A permanent reduction in Preference AUMs must not occur unless the Land Use Plan conveys that these AUMs are no longer available for livestock grazing and the Authorized Officer makes a formal finding on the basis of long-term quantitative monitoring data that there is no "realistic expectation that the AUMs can be returned to active livestock use in the foreseeable future." See 60 Fed. Reg. 9931 (2/22/1995). OLD TEXT: "§ 4110.3-2 Decreasing Permitted Use (b) When monitoring or field observa-tions show grazing use or patterns of use are not consistent with the provisions of subpart 4180, or grazing use is otherwise causing an unacceptablelevel or pattern of utilization, or when use exceeds the livestock carrying ca-pacity as determined through moni-toring, ecological site inventory or other acceptable methods, the authorized officer shall reduce permitted grazing use or otherwise modify man-agement practices. COMMENTER'S RECOMMENDED NEW TEXT: (b) When monitoring trends show grazing use is not consistent with the provisions of these Regulations, or, when use exceeds the domestic livestock carrying capacity, as determined through quantitative monitoring, ecological site inventory or other acceptable science-based methods, the authorized officer shall, if necessary to maintain or improve rangeland productivity, modify management practices to achieve management objectives. If modification of management practices does not achieve management objectives, then the authorized officer may reduce active use in direct proportion to the quantity of excess grazing documented by quantitative monitoring. (c) Any decrease in active use shall be classified as suspended use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Dearing Ranch		1311	7	Subpart 4110 - Qualifications and Preference	43 C.F.R. § 4110.1 Mandatory qualifications. The Taylor Grazing Act, grazing districts, and Public Rangelands Improvement Act all require that grazing permits be issued to entities that own or control base property and actually graze livestock on the range. The regulations should be amended to require that a permittee must be actively engaged in the livestock business and intend to use the permitted allotments to graze livestock: "§ 4110.1 Mandatory Qualifications. (a) Except as provided under §§ 4110.1-1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an applicant must own or control land or water base property, be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock, and must be..."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Johnson	Roger			1234	2	Subpart 4110 - Qualifications and Preference	§ 4110.3-3 Implementing changes in active use. (a)(1) After consultation, cooperation, and coordination with the affected permittee or lessee and the state having lands or responsibility for managing resources within the area, the authorized officer will implement changes in active use through a documented agreement or by a decision. The authorized officer will implement changes in active use in excess of 10 percent over a 5-year period unless: (i) After consultation with the affected permittees or lessees, an agreement is reached to implement the increase or decrease in less than 5 years, or (ii) The changes must be made before 5 years have passed in order to comply with applicable law. (2) Decisions implementing §4110.3-2 will be issued as proposed decisions pursuant to §4160.1, except as provided in paragraph (b) of this section. (b)(1) After consultation with, or a reasonable attempt to consult with, affected permittees or lessees and the state having lands or responsibility for managing resources within the area, the authorized officer will close (should not always be default decision) allotments or portions of allotments to grazing by any kind of livestock or modify authorized grazing use notwithstanding the provisions of paragraph (a) of this section when the authorized officer determines and documents that- (i) The soil, vegetation, or other resources on the public lands require immediate protection (or harvesting or stimulation) because of conditions such as drought, fire, flood, or insect infestation (excessive fire fuel); or (ii) Continued grazing use (or over rest) poses an imminent likelihood of significant resource damage (including fire).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	40	Subpart 4110 - Qualifications and Preference	§ 4110.2-4 Allotments. OLD TEXT After consultation, cooperation, and coordination with the affected grazing permittees or lessees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may designate and adjust grazing allotment boundaries. The authorized officer may combine or divide allotments, through an agreement or by decision, when necessary for the proper and efficient management of public rangelands. NEW TEXT After consultation, cooperation, and coordination with the affected grazing permittees or lessees, the State having lands or responsible for managing resources within the area, landowners whose private lands are within the allotment, and the authorized officer may designate and adjust grazing allotment boundaries. The authorized officer may combine or divide allotments, through an agreement with the permittee(s) or lessee(s) in the allotment(s) or by decision, when necessary for the proper and efficient management of public rangelands. RATIONALE See insertions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	ortega	adam	Colorado Department of Agriculture	CO	981	6	Subpart 4110 - Qualifications and Preference	§ 4110.1 Mandatory qualifications. Addition of subsection (4) actively engaged in or facilitating the production of livestock. Addition of this subsection would ensure preference to the production of livestock as a congressionally mandated use of federal lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	43	Subpart 4110 - Qualifications and Preference	OLD TEXT § 4110.3-2 Decreasing permitted use. (a) Permitted use may be suspended in whole or in part on a temporary basis due to drought, fire, or other natural causes, or to facilitate installation, maintenance, or modification of range improvements. NEW TEXT § 4110.3-2 Decreasing active use. (a) Active use may be suspended in whole or in part on a temporary basis due to drought, fire, or other natural causes, or to facilitate installation, maintenance, or modification of range improvements. RATIONALE See insertions and deletions

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	42	Subpart 4110 - Qualifications and Preference	OLD TEXT § 4110.3-1 Increasing permitted use. Additional forage may be apportioned to qualified applicants for livestock grazing use consistent with multiple use management objectives. (a) Additional forage temporarily available for livestock grazing use may be apportioned on a nonrenewable basis. (b) Additional forage available on a sustained yield basis for livestock grazing use shall first be apportioned in satisfaction of suspended permitted use to the permittee(s) or lessee(s) authorized to graze in the allotment in which the forage is available. (c) After consultation, cooperation, and coordination with the affected permittees or lessees, the State having lands or managing resources within the area, and the interested public, additional forage on a sustained yield basis available for livestock grazing use in an allotment may be apportioned to permittees or lessees or other applicants, provided the permittee, lessee, or other applicant is found to be qualified under subpart 4110 of this part. Additional forage shall be apportioned in the following priority: NEW TEXT § 4110.3-1 Increasing Active use. Additional forage shall be apportioned to qualified applicants for livestock grazing use consistent with the applicable objectives the land use plan. (a) Additional forage temporarily available for livestock grazing use shall be apportioned on a nonrenewable basis as provided for in § 4130.62. (b) Additional forage available that meets or exceeds the carrying capacity for livestock grazing use in an allotment shall first be apportioned in satisfaction of suspended use to the permittee(s) or lessee(s) authorized to graze in the allotment in which the forage is available. (c) After consultation, cooperation, and coordination with the affected permittees or lessees, the State having lands or managing resources within the area, and the interested public, additional forage that meets or exceeds the carrying capacity livestock grazing use in an allotment shall may be apportioned to permittees or lessees or other applicants, provided the permittee, lessee, or other applicant is found to be qualified under subpart 4110 of this part. Additional forage shall be apportioned in the following priority: RATIONALE Comment [AS22]: The word "may" is recommended to be replaced with "shall" to ensure that BLM does not simply deny a reasonable application to increase Active use. See Jose Talancon1998Family Trust v. BLM, 174 IBLA 152, 174 (2008). This change is further noted below. This is not to say there might not exist a rational basis to not increase Active use; it is just contended that the rule should be amended to negate the BLM from saying "no" just because they can say "no" based upon the word "may".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	41	Subpart 4110 - Qualifications and Preference	OLD TEXT § 4110.3 Changes in permitted use. The authorized officer shall periodically review the permitted use specified in a grazing permit or lease and shall make changes in the permitted use as needed to manage, maintain or improve rangeland productivity, to assist in restoring ecosystems to properly functioning condition, to conform with land use plans or activity plans, or to comply with the provisions of subpart 4180 of this part. These changes must be supported by monitoring, field observations, ecological site inventory or other data acceptable to the authorized officer. NEW TEXT § 4110.3 Changes in Active use. The authorized officer shall periodically review the Active use specified in a grazing permit or lease and shall make changes in the Active use to meet applicable objectives in the land use plan or in an activity plan, inclusive of an allotment management plan _____. These changes must be independently supported by the authorized officer's determination of the carrying capacity for livestock grazing use in the allotment _____. RATIONALE See insertions and deletions

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	36	Subpart 4110 - Qualifications and Preference	OLD TEXT § 4110.2-2 Specifying permitted use. (a) Permitted use is granted to holders of grazing preference and shall be specified in all grazing permits and leases. Permitted use shall encompass all authorized use including livestock use, any suspended use, and conservation use, except for permits and leases for designated ephemeral rangelands where livestock use is authorized based upon forage availability, or designated annual rangelands. Permitted livestock use shall be based upon the amount of forage available for livestock grazing as established in the land use plan, activity plan, or decision of the authorized officer under § 4110.3-3, except, in the case of designated ephemeral or annual rangelands, a land use plan or activity plan may alternatively prescribe vegetation standards to be met in the use of such rangelands. NEW TEXT § 4110.2-2 Specifying Grazing preference. (a) All grazing permits and grazing leases will specify grazing preference, except for permits and leases for designated ephemeral rangelands where livestock use is authorized based upon forage availability, or designated annual rangelands. Preference includes Active use and Suspended use. Preference shall be based upon the amount of forage available for livestock grazing as established in the land use plan, activity plan, or decision of the authorized officer under § 4110.3-3, except, in the case of designated ephemeral or annual rangelands, a land use plan or activity plan may alternatively prescribe vegetation standards to be met in the use of such rangelands. RATIONALE See insertions and deletions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	39	Subpart 4110 - Qualifications and Preference	OLD TEXT (e) If an unqualified transferee acquires rights in base property through operation of law or testamentary disposition, such transfer will not affect the grazing preference or any outstanding grazing permit or lease, or preclude the issuance or renewal of a grazing permit or lease based on such property for a period of 2 years after the transfer. However, such a transferee shall qualify under paragraph (a) of this section within the 2year period or the grazing preference shall be subject to cancellation. The authorized officer may grant extensions of the 2year period where there are delays solely attributable to probate proceedings. NEW TEXT (e) If an unqualified transferee acquires rights in base property _____, such transfer will not affect the grazing preference or any outstanding grazing permit or lease, or preclude the issuance or renewal of a grazing permit or lease based on such property for a period of 2 years after the transfer. However, such a transferee shall qualify under paragraph (a) of this section within the 2year period or the grazing preference shall be subject to cancellation. The authorized officer may grant extensions of the 2year period where there are delays solely attributable to probate OR OTHER JUDICIAL proceedings. RATIONALE Comment [AS21]: The rule should clarify that its application is not limited to events that occur by "operation of law" or by "testamentary disposition" but to any events, inclusive of a voluntary conveyance wherein it is determined after the conveyance that the applicant cannot qualify for a Grazing Permit or Lease. The Grazing preference should remain attached to the base property and be available for transfer under 43 C.F.R. § 4110.23 unless cancelled under 4170, or unless otherwise cancelled by the Secretary under 43 C.F.R. § 4110.23, see 43 C.F.R. § 4110.23(g), or under 43 C.F.R. § 4110.42(b).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	35	Subpart 4110 - Qualifications and Preference	<p>OLD TEXT (d) If a permittee or lessee loses ownership or control of all or part of his/ her base property, the permit or lease, to the extent it was based upon such lost property, shall terminate immediately without further notice from the authorized officer. However, if, prior to losing ownership or control of the base property, the permittee or lessee requests, in writing, that the permit or lease be extended to the end of the grazing season or grazing year, the termination date may be extended as determined by the authorized officer after consultation with the new owner. When a permit or lease terminates because of a loss of ownership or control of a base property, the grazing preference shall remain with the base property and be available through application and transfer procedures at 43 CFR 4110.2-3, to the new owner or person in control of that base property. NEW TEXT (d) If a permittee or lessee loses ownership or control of all or part of his/ her base property, the permit or lease, to the extent it was based upon such lost property, shall terminate immediately without further notice from the authorized officer. However, if, prior to losing ownership or control of the base property, the permittee or lessee requests, in writing, that the permit or lease be extended to the end of the grazing season or grazing year, the termination date may be extended as determined by the authorized officer after consultation with the new owner. When a permit or lease terminates because of a loss of ownership or control of a base property, the grazing preference shall remain with the base property and be available through application and transfer procedures at 43 CFR 4110.2-3, to the ___ owner or person in control of that base property. RATIONALE Comment [AS20]: The word "new" is unnecessary because the application of this rule could implicate an existing owner (due to an expiring lease of base property) or new owner (due to the conveyance of base property). The intent of the rules should be clear that the Grazing preference should remain attached to the base property and be available for transfer under 43 C.F.R. § 4110.23 unless cancelled under 4170, or unless otherwise cancelled by the Secretary under 43 C.F.R. § 4110.23, see 43 C.F.R. § 4110.23(g), or under 43 C.F.R. § 4110.42(b).</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	44	Subpart 4110 - Qualifications and Preference	<p>OLD TEXT (b) When monitoring or field observations show grazing use or patterns of use are not consistent with the provisions of subpart 4180, or grazing use is otherwise causing an unacceptable level or pattern of utilization, or when use exceeds the livestock carrying capacity as determined through monitoring, ecological site inventory or other acceptable methods, the authorized officer shall reduce permitted grazing use or otherwise modify management practices. NEW TEXT b) When monitoring shows the levels of grazing use exceeds the carrying capacity for livestock grazing use, the authorized officer shall reduce Active use (c) Any decrease in active use shall be classified as suspended use. RATIONALE Comment [AS23]: The words "exceeds the carrying capacity for livestock grazing use" are added because it is recognized that "carrying capacity" as proposed to be redefined in Section 4100.05 will speak to the (overall) grazing capacity within the allotment, but it is understood that often times some of that "carrying capacity" must be allocated to wild horses, wild burros, and wildlife, as prescribed by the land use plan or activity plans Comment [AS24]: Section 4110.32(b) demands to be clarified and refined so as to distinguish between: (1) the need to decrease Active use due to a lack of carrying capacity, i.e. "level of grazing use"; and (2) the need to modify terms & conditions due to nonachievement of an applicable objective, i.e. "grazing management practices". The former is regulated by the intended proposed amendment in Section 4110.32(b) and the latter is regulated by the intended proposed amendment to Section 4130.33. The rules should clarify there is a clear distinction between the "level of grazing use" and "grazing management practices".</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	22	Subpart 4110 - Qualifications and Preference	OLD TEXT (b) Applicants for the renewal or issuance of new permits and leases and any affiliates must be determined by the authorized officer to have a satisfactory record of performance. NEW TEXT (b) Applicants for the renewal or issuance of new permits and leases must be determined by the authorized officer to have a satisfactory record of performance. RATIONALE See comment under the definition of affiliates
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	29	Subpart 4110 - Qualifications and Preference	OLD TEXT (b) Additional forage available on a sustained yield basis for livestock graz-ing use shall first be apportioned in satisfaction of suspended permitted use to the permittee(s) or lessee(s) author-ized to graze in the allotment in which the forage is available. NEW TEXT, or grazing use is otherwise causing an unacceptable level or pattern of utilization, or when use exceeds the livestock carrying capacity as determined through monitoring, or trend data, the authorized officer shall reduce permitted grazing use or otherwise modify management practices under adaptive management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	33	Subpart 4110 - Qualifications and Preference	OLD TEXT NONE NEW TEXT Any determination must be based upon previous adjudicated claims of non-compliance or upon claims of non-compliance that would be subject to adjudication either before or simultaneously with making the determination. Any adverse determination that results in the non-renewal of the expiring grazing permit only results in the non-renewal of the grazing permit, and not the cancellation of the grazing preference and associated active us which shall remain attached to the base property and be available through application and transfer procedures at 43 C.F.R. 4110.2-3 to the owner or controller of the base property that can qualify for the grazing permit. Any cancellation of preference or active use shall only occur as part of Subpart 4170.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	34	Subpart 4110 - Qualifications and Preference	OLD TEXT NONE NEW TEXT (e) Categories of actions excluded from documentation in an environmental assessment (EA) or environmental impact statement (EIS). In the absence of special circumstances, the following actions shall be considered routine actions for the grazing of public lands and shall be excluded from documentation in an EA or an EIS: Renewal of 10 year Grazing Permits Issuance of Temporary Non Renewable (TNR) Grazing Permits (f) Special Circumstances: The presence of a Special Circumstance does not preclude the use of a CE. In considering the proposed action, the Authorized Officer should determine whether or not any Special Circumstances are present, and if so, the degree of the effects on the listed resources (see definition of Special Circumstance). If the Authorized Officer determines that the degree of the effect of the proposed action will significantly alter resource condition, the Special Circumstance exits that precludes use of a categorical exclusion.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	48	Subpart 4110 - Qualifications and Preference	OLD TEXT § 4110.4-2 Decrease in land acreage. (a) Where there is a decrease in public land acreage available for livestock grazing within an allotment: (1) Grazing permits or leases may be cancelled or modified as appropriate to reflect the changed area of use. (2) Permitted use may be cancelled in whole or in part. Cancellations determined by the authorized officer to be necessary to protect the public lands will be apportioned by the authorized officer based upon the level of available forage and the magnitude of the change in public land acreage available, or as agreed to among the authorized users and the authorized officer. (b) When public lands are disposed of or devoted to a public purpose which precludes livestock grazing, the permittees and lessees shall be given 2 years' prior notification except in cases of emergency (national defense requirements in time of war, natural disasters, national emergency needs, etc.) before their grazing permit or grazing lease and grazing preference may be canceled. A permittee or lessee may unconditionally waive the 2-year prior notification. Such a waiver shall not prejudice the permittee's or lessee's right to reasonable compensation for, but not to exceed the fair market value of his or her interest in authorized permanent range improvements located on these public lands (see § 4120.3-6). [43 FR 29067, July 5, 1978, as amended at 49 FR 6451, Feb. 21, 1984; 49 FR 12704, Mar. 30, 1984; 54 FR 31485, July 28, 1989; 60 FR 9963, Feb. 22, 1995] NEW TEXT § 4110.4-2 Decrease in land acreage. (a) Where there is a decrease in public land acreage available for livestock grazing within an allotment: (1) Grazing permits or leases may be canceled or modified as appropriate to reflect the changed area of use. If the land is permanently decreased with no foreseeable return to grazing, as in a military installation, preference may be cancelled. (2) Active use may be canceled in whole or in part. Reductions determined by the authorized officer to be necessary to protect the public lands will be apportioned by the authorized officer based upon the level of available forage and the magnitude of the change in federal or public land acreage available, or as agreed to among the authorized users and the authorized officer. (b) When public lands are disposed of or devoted to a public purpose which precludes livestock grazing, the permittees and lessees shall be given 2 years' prior notification except in cases of emergency (national defense requirements in time of war, natural disasters, national emergency needs, etc.) before their grazing permit or grazing lease and grazing preference may be canceled. A permittee or lessee may unconditionally waive the 2-year prior notification. Such a waiver shall not prejudice the permittee's or lessee's right to reasonable compensation for, but not to exceed the fair market value of his or her interest in authorized permanent range improvements located on these public lands (see §4120.3-

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	46	Subpart 4110 - Qualifications and Preference	OLD TEXT § 4110.3-2 Decreasing permitted use. (a) Permitted use may be suspended in whole or in part on a temporary basis due to drought, fire, or other nat-ural causes, or to facilitate installa-tion, maintenance, or modification of range improvements. (b) When monitoring or field observa-tions show grazing use or patterns of use are not consistent with the provi-sions of subpart 4180, or grazing use is otherwise causing an unacceptablelevel or pattern of utilization, or when use exceeds the livestock carrying ca-pacity as determined through moni-toring, ecological site inventory or other acceptable methods, the author-ized officer shall reduce permitted grazing use or otherwise modify man-agement practices. [53 FR 10234, Mar. 29, 1988, as amended at 60 FR 9963, Feb. 22, 1995] NEW TEXT (b) When the authorized officer determines that the level of active use by livestock is not contributing to achievement of allotment management plan and/or allotment objectives that have been develop in close consultation, cooperation and coordination with the permittee(s) or lessee(s), the authorized officer determines the soil, vegetation, or other resources on the public lands require temporary protection because of conditions such as drought, fire, flood, or insect infestation, or when continued grazing use poses a significant risk of resource damage, after consultation with, or a reasonable attempt to consult with, affected permittees or lessees, action shall address grazing by any kind of livestock or modify active grazing use, notwithstanding the provisions of 4110.3-2(a) of this section. Notices or decisions requiring modification of livestock active grazing use may be issued as a final decision. Changes in active use over 10% shall be implemented over a 5 year period, unless after consultation with the affected permittee(s) or lessee(s) an agreement is reached to implement the decrease in less than 5 years or the decision shall be issued in "full force and effect."affected interest Notices of closure and decisions requiring modification of authorized active use may be issued as final decisions effective upon issuance or on the date specified in the decision. Such decisions shall remain in effect pending the decision on appeal unless a stay is granted by the Office of Hearings and Appeals in accordance with 43 CFR4.21.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	45	Subpart 4110 - Qualifications and Preference	<p>OLD TEXT § 4110.3-1 Increasing permitted use. Additional forage may be apportioned to qualified applicants for live-stock grazing use consistent with mul-tiple-use management objectives. (a) Additional forage temporarily available for livestock grazing use may be apportioned on a nonrenewable basis. (b) Additional forage available on a sustained yield basis for livestock graz-ing use shall first be apportioned in satisfaction of suspended permitted use to the permittee(s) or lessee(s) author-ized to graze in the allotment in which the forage is available. (c) After consultation, cooperation, and coordination with the affected per-mittees or lessees, the State having lands or managing resources within the area, and the interested public, addi-tional forage on a sustained yield basis available for livestock grazing use in an allotment may be apportioned to permittees or lessees or other appli-cants, provided the permittee, lessee, or other applicant is found to be quali-fied under subpart 4110 of this part. Ad-ditional forage shall be apportioned in the following priority: (1) Permittees or lessees in propor-tion to their contribution or steward-ship efforts which result in increased forage production; (2) Permittee(s) or lessee(s) in pro-portion to the amount of their per-mitted use; and (3) Other qualified applicants under § 4130.1-2 of this title. [53 FR 10233, Mar. 29, 1988, as amended at 60 FR 9963, Feb. 22, 1995] NEW TEXT §4110.3-1 Increasing active use. Additional forage shall be apportioned to qualified applicants for livestock grazing use consistent with multiple-use management objectives. (a) Additional forage temporarily available for livestock grazing use including forage which is temporarily available within an allotment because of a change in grazing use under Sec. 4130.1 shall be apportioned on a nonrenewable basis. (b) Additional forage available on a sustained yield basis for livestock grazing use shall first be apportioned in satisfaction of suspended usethe permittee(s) or lessee(s) authorized to graze in the allotment in which the forage is available. (c) After consultation, cooperation, and coordination, with the affected permittees or lessees, and the State having lands or managing resources within the area, additional forage on a sustained yield basis available for livestock grazing use over and above preference(s) of the permittee(s) or lessee(s) in an allotment may be apportioned Additional forage shall be apportioned in the following priority: (1) Permittee(s) or lessee(s) in proportion to the contribution or effort which resulted in increased forage production; (2) Permittees or lessees in proportion to their contribution or stewardship effort which result in increased forage production(3) Permittee(s) or lessee(s) in proportion to the amount of their grazing preference; and (4) Other qualified applicants under Sec. 4130.1-3 of this title.</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	41	Subpart 4110 - Qualifications and Preference	<p>OLD TEXT (f) Transfers shall be for a period of not less than 3 years unless a shorter term is determined by the authorized officer to be consistent with manage-ment and resource condition objec-tives. NEW TEXT (f) Transfers shall be for a period of not less than 3 years unless a shorter term is determined by the authorized officer to be consistent with management and resource condition objectives. (g) Failure of either the transferee or the transferor to comply with the regulations of this section may result in rejection of the transfer application or cancellation of grazing preference.</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	37	Subpart 4110 - Qualifications and Preference	OLD TEXT (a) Permitted use is granted to hold-ers of grazing preference and shall be specified in all grazing permits and leases. Permitted use shall encompass all authorized use including livestock use, any suspended use, and conserva-tion use, except for permits and leases for designated ephemeral rangelands where livestock use is authorized based upon forage availability, or designated annual rangelands. Permitted live-stock use shall be based upon the amount of forage available for live-stock grazing as established in the land use plan, activity plan, or decision of the authorized officer under § 4110.3-3, except, in the case of designated ephemeral or annual rangelands, a land use plan or activity plan may alter-natively prescribe vegetation standards to be met in the use of such range-lands. NEW TEXT (a) Grazing preference shall be specified in all grazing permits or grazing leases. It shall include active use and suspended use and shall be based upon the amount of forage available or livestock grazing established by the original permit or lease adjudication. Active useActive use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	32	Subpart 4110 - Qualifications and Preference	OLD TEXT (a) Except as provided under §§ 4110.1- 1, 4130.5, and 4130.6-3, to qualify for grazing use on the public lands an ap-plicant must own or control land or water base property, and must be: NEW TEXT (a) Except as provided under §§4110.1-1, 4130.5 and 4130.6-3, to qualify for grazing use on the public lands an applicant must be engaged in the livestock business, must own or control land or water base property, and must be:
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	40	Subpart 4110 - Qualifications and Preference	OLD TEXT (1) The transferee shall meet all qualifications and requirements of §§ 4110.1, 4110.2-1, and 4110.2-2. (2) The transfer applications under paragraphs (b) and (c) of this section shall evidence assignment of interest and obligation in range improvements authorized on public lands under § 4120.3 and maintained in conjunction with the transferred preference (see § 4120.3-5). The terms and conditions of the cooperative range improvement agreements and range improvement permits are binding on the transferee. (3) The transferee shall accept the terms and conditions of the termi-nating grazing permit or lease (see § 4130.2) with such modifications as he may request which are approved by the authorized officer or with such modi-fications as may be required by the au-thorized officer. (4) The transferee shall file an appli-cation for a grazing permit or lease to the extent of the transferred preference simultaneously with filing a transfer application under paragraph (b) or (c) of this section. (b) If base property is sold or leased, the transferee shall within 90 days of the date of sale or lease file with the authorized officer a properly executed transfer application showing the base property and the amount of permitted use being transferred in animal unit months. NEW TEXT (1) The transferee shall meet all qualifications and requirements of §§4110.1, 4110.2-1 and 4110.2-2 of this part. (2) The transfer applications under paragraphs (b) and (c) of this section shall evidence assignment of interest and obligation in range improvements authorized on public lands under §4120.3 and maintained in conjunction with the transferred preference (see §4120.3-5). The terms and conditions of the cooperative agreements and range improvement of this section. (b) If base property is sold or leased, the transferee shall within 90 days of the date of sale or lease file with the authorized office a properly executed transfer application showing the base property and the amount of active use being transferred in animal unit months.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	38	Subpart 4110 - Qualifications and Preference	OLD TEXT NEW TEXT (c) Active use shall be based upon the amount of forage available for livestock grazing, as specified in an activity plan or decision of the authorized officer under 4110.3-3, except in the case of designated ephemeral or annual rangelands, a use plan activity or activity plan may be alternatively prescribe vegetation objectives to be met in the use of such rangelands. (d) The animal unit months of active use are attached to: (1) The acreage of land base property on a pro rata basis, or (2) Water base property on the basis of livestock forage production within the service area of the water.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	43	Subpart 4110 - Qualifications and Preference	OLD TEXT After consultation, cooperation, and coordination with the affected grazing permittees or lessees, the State having lands or responsible for managing re-sources within the area, and the inter-ested public, the authorized officer may designate and adjust grazing allot-ment boundaries. The authorized offi-cer may combine or divide allotments, through an agreement or by decision, when necessary for the proper and effi-cient management of public range-lands. NEW TEXT After consultation, cooperation and coordination with the affected permittees or lessees, and the State having lands or responsible for managing resources within the area, the authorized officer may designate and adjust allotment boundaries. The authorized office may designate and adjust allotment boundaries through agreement of by a decision
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	47	Subpart 4110 - Qualifications and Preference	OLD TEXT § 4110.4 Changes in public land acre-age. § 4110.4-1 Additional land acreage. When lands outside designated allot-ments become available for livestock grazing under the administration of the Bureau of Land Management, the forage available for livestock shall be made available to qualified applicants at the discretion of the authorized offi-cer. Grazing use shall be apportioned under § 4130.1-2 of this title. [53 FR 10234, Mar. 29, 1988] NEW TEXT §4110.4 Changes in public land acreage. § 4110.4-1 Additional land acreage. (a) When lands outside designated allotments become available for livestock grazing under the administration of the Bureau of Land Management, the forage available for livestock shall be made available to qualified applicants.. Grazing use shall be apportioned under § 4130.1-2 of this title. (b) When lands inside designated allotment allotments become available for livestock grazing under the administration of the Bureau of Land Management, the forage available for livestock shall be made available to the permittee(s) or lessee(s) in the allotment. Grazing use shall be apportioned 4130.1-2 of this title to the extent there is more than one permittee or lessee in the application
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	44	Subpart 4110 - Qualifications and Preference	OLD TEXT § 4110.3 Changes in permitted use. The authorized officer shall periodi-cally review the permitted use speci-fied in a grazing permit or lease and shall make changes in the permitted use as needed to manage, maintain or improve rangeland productivity, to as-sist in restoring ecosystems to prop-erly functioning condition, to conform with land use plans or activity plans, or to comply with the provisions of subpart 4180 of this part. These changes must be supported by monitoring, field observations, ecological site inventory or other data acceptable to the author-ized officer. [60 FR 9963, Feb. 22, 1995] NEW TEXT § 4110.3 Changes in active use. The authorized officer shall periodically review the active use specified in a grazing permit or grazing lease and may make changes in the active use through agreement or decision. These changes must be supported by monitoring unless the change is necessary to manage, maintain or improve rangeland productivity under and emergency situation. [53 FR 10233, Mar. 29, 1988]
Subpart 4120 - Grazing Management								

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mackenzie	Mark		OR	934	1	Subpart 4120 - Grazing Management	-Activate suspended use in conjunction with flexibility and reinstate T.N.R. local oversight and accountability for all employees (BLM)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	907	5	Subpart 4120 - Grazing Management	· Current rangeland monitoring is inconsistent and variable in methods and timing (commonly infrequent), which doesn't allow for reliable trend development. Many of the current monitoring methods are based on opinions and treated as science. · BLM personnel are often unfamiliar with my rangelands, ecosystems, and climate and may lack appropriate experience to determine rangeland "health" and the impact of my livestock on the range condition without measuring key rangeland attributes and knowing site specific management. · Grazing allotments are effected by many things and livestock grazing is not the sole influence on rangeland conditions. As a permitted user, my livestock are unfairly held responsible for rangeland conditions when conditions, based on an individual's opinion, don't meet an arbitrarily set standard. · Rangeland health cannot be determined over a short time period as a trend needs to be estimated. A one-time Rangeland Health assessment could be positively/negatively influenced by multiple short-term factors like rainfall, temperature, season or wildlife that would provide a false interpretation of "rangeland health". Rangeland Health assessment cannot estimate a trend.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Benes	Michelle		IA	745	1	Subpart 4120 - Grazing Management	Grazing practices must take better care of BLM lands. Only 30% of the vegetation should be grazed, so that plants can reproduce, better survive drought and provide not only a bigger meal for cattle but also food for seed-eating birds, cover for small mammals and flowers for bees and other pollinators. Currently much higher percentages – up to 90% – of plants are grazed by livestock. The 30% limit has been shown in studies to benefit both the grazed lands ecologically and ranchers economically.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	26	Subpart 4120 - Grazing Management	At 4120.2, Allotment Management plans and resource activity plans. In (4) (c), the WSGB comments that the new Regulations should not include the requirement that the BLM must provide the "interested public" an opportunity to be directly involved in the planning and environmental analysis of grazing plans. The WSGB supports the right of the "interested public" to provide comments to the BLM on this subject, but that only "Affected citizens" should be directly involved.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	26	Subpart 4120 - Grazing Management	The Livestock Groups suggest modifying the regulation regarding range improvements under an allotment management plan: "§ 4120.3-1(f) Conditions for range improvements. OLD TEXT (1995 Regulations): f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. NEW TEXT: Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion. The range improvements are not decisions subject to protest or appeal under Section 4160.2."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Katlyn	Nevada State Grazing Board N2	NV	1174	13	Subpart 4120 - Grazing Management	Flexibility is also recognized as an essential element of Allotment Management Plans (AMPs) and both their implementation and overall land management. The Board maintains that rangelands are ever evolving and dynamic due to factors such as invasive species, drought, and fire. Flexibility allows management to adjust to these changing conditions in an effective, collaborative method. With the current fixed permit conditions such as strict AUMs, rigid on and off dates, and several other non-negotiable permit conditions, permittees are prohibited from adjusting accordingly to annual conditions. Permittees practice flexibility on their private lands which should be viewed as an essential tool for the BLM to take advantage of. The Board strongly suggests that the BLM embrace cooperation with permittees instead of shunning their on-the-ground expertise. It is essential that the BLM recognize the importance of flexibility within the AMPs. Allotment monitoring can only be effective if it has the flexibility to adapt and appropriately collect information based on the changing conditions of the allotment. Both permittees and Rangeland Specialists do not have the luxury of waiting for time consuming EAs to occur before making proactive management decisions that will benefit BLM public lands. The current processes are achieving the exact opposite, effectively demonstrating why these regulations need to incorporate flexibility.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	28	Subpart 4120 - Grazing Management	Regulatory language regarding range improvements should be changed to: "§ 4120.3-1(f) Conditions for range improvements. (f) Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	18	Subpart 4120 - Grazing Management	Conduct monitoring that includes measures of productivity, wildlife habitat characteristics for their needs, and ground cover. Use objective evidence based data collection rather than subjective processes that lacks validation. Gather information needed for carrying capacity assessments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	55	Subpart 4120 - Grazing Management	Regulatory language regarding range improvements should be changed to: "§ 4120.3-1(f) Conditions for range improvements. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon			1227	10	Subpart 4120 - Grazing Management	Water; Water should never be a condition of permit issuance for the same reasons as above. Neither should BLM file on any water except that which exists because of their own water projects.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry and Diane		MT	960		2 Subpart 4120 - Grazing Management	Water infrastructure is a big need in much of the West. In Central Montana, many of the stock ponds are either silted in or have too much saline to be used by stock or wildlife. We have used private wells and pipelines to get water to private lands, but we will not put tanks on BLM lands due to the requirement of a BLM water right on a private water source. We manage BLM lands the same as our private and would be willing to share our water source to benefit both our cattle, wildlife, and forage management if the stipulation of a BLM water right were removed. BLM initiative to drill water wells and work with land mangers across land ownership boundaries would be beneficial to all.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rathbun	Floyd	FIM Corp	NV	1284		6 Subpart 4120 - Grazing Management	Grazing Permits often include stipulations that force the permittee to say BLM has authority that is otherwise not available in law --- eliminate those stipulations. They include such things as a BLM demands to control water rights and activities within rights of way.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197		24 Subpart 4120 - Grazing Management	Current regulation discourages permittees/lessees from paying for water related range improvements if the BLM is instructed by this Regulation to file for these water rights in the name of the United States, " to the extent allowed by the law.. ".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bellwood	Samantha	Nevada Department of Agriculture	NV	1009		3 Subpart 4120 - Grazing Management	CFR 4120.2 - Allotment Management Plans: Allotment Management Plans (AMPs) are often outdated and do not reflect change in conditions or current management. NDA request BLM revise the AMP process to not prohibit flexibility as found in 4120.2(a)(3) "Specify the limits of flexibility, to be determined and granted..." but rather develop a wide array of options to guide livestock management to meet desired resource conditions. The department also believes NEPA should only analyze the permit, not the AMP. The BLM restricts themselves and the grazing permittees from making changes to livestock grazing management on an annual basis due to the limited flexibility and Record Decision. Ultimately this lack of flexibility hinders the grazing permittees from making progress towards rangeland health standards
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197		22 Subpart 4120 - Grazing Management	Certain range improvements paid for by the applicant should be as Section 4 permits. When the costs of a project is shared between the government and an applicant, a cooperative agreement is appropriate and ownership is shared in proportion to the amounts contributed by either party.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lee	Don L. (Bebo)	New Mexico Federal Lands Council	NM	1366		3 Subpart 4120 - Grazing Management	Certain range improvements paid for by the applicant should be as Section 4 permits. When the costs of a project is shared between the government and an applicant, a cooperative agreement is appropriate and ownership is shared in proportion to the amounts contributed by either party.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Rosemary			1194	6	Subpart 4120 - Grazing Management	Section 4130.2 (c) Grazing permits do convey the right to the forage and water and rights-of-way on the lands held in trust by the United States, and they are conveyed by law. These are important resources for livestock production and are bought and sold with the base property for grazing preference. Therefore the preference permit for the allotment conveys an ownership in these particular resources, and BLM officials do not have the legal authority to cancel these.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	43	Subpart 4120 - Grazing Management	Range Improvement Projects: The grazing regulations should seek to streamline the process to approve and implement range improvements, particularly water development and distribution projects. Water is the limiting factor for most livestock operations across the arid west and limits the amount of habitat available to wildlife. Thus, a more development friendly regulatory framework would serve to allow the most limiting factor for both livestock production and wildlife populations to be addressed in a timely manner. Existing restrictions on the use and placement of nutritional supplements on public grazing lands should also be revised. Supplementation with products that are currently restricted and/or in locations that are currently prohibited will often be necessary or beneficial to successfully implement targeted grazing and outcome based grazing projects or other prescriptive grazing programs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Katlyn	Nevada State Grazing Board N2	NV	1174	4	Subpart 4120 - Grazing Management	After the Babbitt Range Reform initiative went into effect, the Board noted a lack in the use of Allotment Management Plan (AMP) development throughout the BLM administered land areas. Instead, the agency issues a permit with specific requirements (permitted AUMs, on and off dates, etc.) and an Environmental Assessment, or EA, for public review and comment. This approach is a dictate of updated permit conditions with AUM numbers and dates, instead of a plan brought about by BLM and permittee cooperative planning. The Board strongly believes that the BLM needs to prioritize AMPs as the most essential land use activity plan when addressing livestock grazing. When an AMP is developed collaboratively with a permittee and approved, it becomes a roadmap for management over the next 10 years, while outlining any planned management and improvements to be installed over that period. The AMP additionally outlines resource objectives, monitoring process or processes and records the results annually while laying out what changes the BLM and operator may agree to for the next grazing season. The Board strongly suggests that the AMP be the first place a new Range Conservationist should go to determine where things stand with a specific allotment and allows for an easy transition to continue forward in managing the allotment. The N-2 Board strongly recommends making AMPs the priority management focus for all grazing allotments in Nevada. Through flexibility, the BLM would initially provide the permittee a list of resource issues or concerns on the allotment to be addressed and allow for the permittee, who tends to be the most knowledgeable individual regarding the allotment, the opportunity to identify alternatives to address those concerns over a designated timeframe. The permittee could then provide a draft outline of the AMP to BLM for review and consideration. The proposed AMP could be field verified through a BLM team review to ascertain that all issues are addressed. If the plan meets the necessary requirements, the BLM could submit the draft AMP for public review and comment along with an EA. Based on the Board's experience, this approach will save resources that would typically be spent by BLM trying to accomplish a similar goal.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gloeckner	Kena			1198		Subpart 4120 - Grazing Management 4	We are firm believers that in the late 1800s and early 1900s we acquired a preference and a right to use the forage and water on the lands within our allotments. As such we would hope that all revised regulations keep the following in mind: All actions by the Secretary "shall be subject to valid existing rights" in accordance with Title VII of the Federal Land Policy Management Act. Grazing Allotments are NOT "public land," but are split-estate land. Grazing Allotments are a "surface title for all agricultural and ranching purposes," that together with all forage, water rights and improvements constitute a surface property right that predates creation of Grazing Districts under the Pickett Act/Taylor Grazing Act, and as such are "valid existing rights" that give Allotment Owners priority rights that supersede all terms or conditions of all plans, permits, contracts and other instruments. Should the Allotment Owner choose not to enter into the optional cooperative permit/agreement contract, the DOI cannot interfere with the surface use of the Allotment Owner except where an Allottee engages in mining or commercial timber harvest activities. See Curtin v Benson 1911, Kinney Coastal Oil v Kieffer 1928, Wilson v Cook 1946, and Watt v Western Nuclear 1983."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159		Subpart 4120 - Grazing Management 36	As previously discussed, targeted grazing is a tool that could be used to reduce wildfire risk and enhance suppression efforts when they are needed by reducing fuel loads and creating fuel breaks.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159		Subpart 4120 - Grazing Management 37	As previously discussed, livestock grazing management is a tool that can be used to address areas not achieving land health.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159		Subpart 4120 - Grazing Management 34	Livestock grazing management is prescribed at the grazing permit, allotment, and pasture level. Stocking rates and densities, grazing seasons, and rotations are all prescribed at these more localized scales, not at watershed or landscape scales.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159		Subpart 4120 - Grazing Management 32	Livestock grazing management is a tool that could be used to address areas not achieving land health.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gloeckner	Kena			1198		Subpart 4120 - Grazing Management 5	we believe many of the current problems that make term permit renewals almost impossible to accomplish in a timely fashion would be resolved. A perfect solution for all current problems would be for the BLM to ask each allotment owner to create an Allotment Management Plan. After all, these people know the land and spend a considerable amount of time "on the ground." It is their goal to always make this land sustainable, and it is the BLM's job to administer the use of these lands. The BLM and local advisory committee would then work cooperatively with the livestock grazer to outline any improvements, resource objectives, monitoring processes, potential issues, and needed changes that they both identify. Each ten years, the AMP would be submitted to the BLM and possibly a local board for review and approval, new concerns or issues would be addressed and resolved, the plan would then be submitted for public review and comment (with the same previous simplified EA included unless drastic changes have occurred), and then approved. If no new changes were required, the same AMP would be approved with no changes, no need for public comment, and no additional required EA. Once the allotment management plan is approved, all range improvements necessary to be used in implementing that plan would not be considered new decisions and would not require another EA. Furthermore, if any interested members of the public reject the plan, the burden of proof for rejection would then placed upon their shoulders to prove the plan unsound, demonstrate direct harm, and to furnish an alternative that doesn't interfere with valid existing rights. Somehow, the ability of environmental groups to "blanket protest" every term permit renewal needs to stop. Especially since these groups can use federal funding to pay their legal fees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	France	Tom	National Wildlife Federation		1237		Subpart 4120 - Grazing Management 5	NWF recommends that BLM address this concern in the proposed rule by clearly specifying when and under what circumstances the agency will consider increases in authorized use to address fuels reduction objectives for rangelands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	41	Subpart 4120 - Grazing Management	<p>§ 4110.3 Interest of member of Congress. Title 41 U.S.C. 151 through 155 (1976) generally prohibits a Member of or Delegate to Congress from entering into any contract or agreement with the United States. Title 41 U.S.C. 22 (1970) generally provides that in every contract or agreement to be made or entered into, or accepted by or on behalf of the United States, there shall be inserted an express condition that no Member of or Delegate to Congress shall be admitted to any share or part of such contract or agreement, or to any benefit to arise thereupon. The provisions of these laws are incorporated herein by reference and apply to all permits, leases, and agreements issued under these regulations. [43 FR 29067, July 5, 1978. Redesignated at 49 FR 6451, Feb. 21, 1984] Subpart 4120-Grazing Management § 4120.1 [Reserved] OLD TEXT: § 4120.2 Allotment management plans. and resource activity plans. Allotment management plans or other activity plans intended to serve as the functional equivalent of allotment management plans may be developed by permittees or lessees, other Federal or affected counties, State resource management agencies, interested citizens, and the Bureau of Land Management. When such plans affecting the administration of grazing allotments are developed, the following provisions apply: (a) An allotment management plan or other activity plans intended to serve as the functional equivalent of allotment management plans shall be prepared in careful and considered consultation, cooperation, and coordination with affected permittee(s) or lessee(s)., landowners involved, the resource advisory council, any State having lands or responsible for managing resources within the area within the area to be covered by such a plan, and the interested public. The plan shall become effective upon approval by the authorized officer. The plans shall- (1) Include terms and conditions under §§4130.3, 4130.3-1, 4130.3-2 and 4130.3-3, and subpart 4180 of this part; (2) Prescribe the livestock grazing practices necessary to meet resource objectives (3) Specify the limits of flexibility, to be determined and granted on the basis of the operator's demonstrated stewardship, within which the permittee(s) or lessee(s) may adjust operations without prior approval of the authorized officer; (4) Provide for monitoring to evaluate the effectiveness of management actions in achieving the resource objectives of the plan. (b) Private and State lands may be included in allotment management plans or other activity plans intended to serve as the functional equivalent of allotment management plans dealing with rangeland management with the consent or at the request of the parties who own or control those lands. (d) A requirement to conform with completed allotment management plans or other applicable activity plans intended to serve as the functional equivalent of allotment management plans shall be incorporated into the terms and conditions</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	20	Subpart 4120 - Grazing Management	<p>Any new grazing regulations must preserve title to all new grazing-related improvements constructed on the public lands (with the exception of temporary improvements) in the name of the party holding title to those lands: the United States. Permittees certainly retain the ability to negotiate the terms upon which these types of improvements are made, including potential compensation for work done.</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	5	Subpart 4120 - Grazing Management	Annual rangelands: There are few truly annual rangelands across the Great Basin and broader Intermountain West. Nearly all locations with cheatgrass, medusahead and/or another annual grass species also have some perennial grasses present: most notably Sandberg bluegrass and bottlebrush squirreltail. There is a strong need to recognize these mixed annual-perennial grass rangelands and manage them accordingly. That is, how to maximize adverse effects toward the annual species, while providing no harm, and ideally benefit to the perennial species. The permitted AUMs for harvest are based on the perennial component (as should be), but the ecological influence of the annual species is ignored, as is their potential for forage at different times of the year: especially outside the growing season. The annual species are present yearround and when abundant they may be a fire danger most of the year. If annual grasses are a year-round problem, they also are a year-round management issue; thus, a management opportunity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	1	Subpart 4120 - Grazing Management	Livestock Grazing - General Recommendations for Improved Management * The rules should require site-specific analysis of known problem areas in terms of livestock management, and other areas have high ecological value and potential adverse impact from livestock, such as wet meadows, floodplains, and key stream reaches.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1080	2	Subpart 4120 - Grazing Management	Use of Ecological Site Descriptions (ESD) should not be part of decision making because they are inaccurate and incomplete in development and untested. These ESDs are continually being updated and changed, therefore decisions and management changes should not be based on this incomplete information. Suggested Improvements · Livestock grazing on BLM lands is permitted, whereas many of the other multiple-uses are not, therefore ranchers need to be meaningfully included in the BLM decision making process because our families are the ones directly affected by those decisions. · Greater involvement by ranchers in decision making process will lead to better results as we will want to meet the common goals we have had a direct hand in creating. For example, working together to develop objectives that have a realistic expectation to improved rangeland conditions through grazing management will have the dedication of both the livestock producer and the agency. · BLM needs to use consistent methods that remove personal opinion and bias, actually measure something and can be used across the majority of BLM allotments and provides understandable information that can be defended. · BLM needs to commit to collecting data in a timeframe that allows for developing meaningful trends.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Back	Gary			1207	4	Subpart 4120 - Grazing Management	The regulations need to be clarified to include monitoring of rangeland health in the allotment management plan so that it does not have to be repeated as a separate step in the permitting process. The collection of monitoring data relevant to the allotment and permit renewal, should be an ongoing process during the term of the permit, thus allowing steps 3 and 4 in the Permit Processing to be completed prior to the time permit renewal is initiated. This would help streamline the process. The handout re: Permit Processing indicates that it currently takes BLM approximately 5 to 7 hears to fully process a grazing permit, and 43 CFR Subpart 4100 §4130.2 indicates the term of a grazing permit is 10 years (unless certain conditions exist). The handout also describes the permit process as including monitoring and evaluation of land health. The way the process is laid out in the handout, it is implied that the monitoring and land health assessment are part of the permit process and not part of the allotment monitoring that is included in the allotment management plan/resource activity plan. Indeed, the permit application or BLM initiation of the permit processing is triggered by among other things "unmet Land Health Standards with livestock causal factor." How is that determination made if rangeland health is not being monitored?
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	20	Subpart 4120 - Grazing Management	MWGA's membership also feels that the process for authorization grazing permit renewals could be streamlined. This can be done by specifically stating in regulation, namely part 4100, that a permit renewal that does not increase permitted use by more than 10% is a categorical exclusion which does not require an environmental assessment or environmental impact statement. As such, MWGA requests that the Agency modify the regulation regarding range improvements under an allotment management plan, namely: § 4120.3-1(f) Conditions for range improvements; (f)"delete the following text" proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.G. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part."end delete text" "Replace deleted text with following text" Range improvements projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion. The range improvements are not decisions subject to protest or appeal under Section 4160.2.: "end replacement text"

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Casey		NV	748		Subpart 4120 - Grazing Management 6	Before imposing grazing restrictions or seeking changes in livestock stocking rates or seasons of permitted use, identify and implement all economically and technically feasible livestock distribution, forage production enhancement, weed control programs, prescribed grazing systems, off-site water development by the water rights holder, shrub and pinyon/juniper control, livestock salting/supplementing plans, and establishment of riparian pastures and herding. Assure that all grazing management actions and strategies fully consider impact on property rights of inholders and adjacent private land owners and consider the potential impacts of such actions on grazing animal health and productivity. The regulations should streamline the ability to implement range improvement projects, primarily water developments. It is crucial to recognize that water distribution is imperative and primary to success in any grazing strategy. This is in addition to strategic use and placement of supplements. Please ensure that priority is placed on development and distribution of water and also placement of supplement. Please also allow supplement use to be placed, in some circumstances, near water sources. This is important because many grazing permits have current terms and conditions prohibiting placement of salt or supplement within a certain distance of water. In outcome based grazing strategies, placement of salt and supplement very near water is often necessary to keep cattle at desired locations and to ensure animal health and productivity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carter	Jacob	Carter Cattle Co.	NV	954		Subpart 4120 - Grazing Management 2	New or improved range developments especially watering facilities can give better livestock distribution and should be encouraged through simple environmental assesment and prompt approval. The ability to gain a stock water right and use that right on an existing grazing right should not be hampered.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Correll	Leanne	SER Conservation District	WY	1066		Subpart 4120 - Grazing Management 1	We urge the BLM to ensure the regulations in effect and enforced be published in the Code of Federal Regulations (CFR) including the removal the Conservation Use Permit from the regulations, as this provision was struck down in 1998 by the 10th Circuit Court and never removed from the regulations. We continue to support this decision. It is of utmost importance to have true, accurate, and up-to-date regulations documented in the CFR to minimize confusion for grazing permittees and lessees, BLM staff, the public, and the courts for the planning and administration of grazing permits and leases.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228		Subpart 4120 - Grazing Management 12	Water rights- The BLM is not in the livestock business and has no legitimate need to own water rights. Section 4120.3-9 and any other regulatory provision that relates to federal acquisition and ownership of water rights should be removed from these regulations. Revised regulations should include a prohibition of such acquisition and ownership.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402		Subpart 4120 - Grazing Management 30	Title to range improvements should be with those who hold Section 4 permits and ownership shared on cooperative agreements in proportion to amounts contributed.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	39	Subpart 4120 - Grazing Management	Title to range improvements should be with those who hold Section 4 permits and ownership shared on cooperative agreements in proportion to amounts contributed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Murphy	Jonathan		UT	743	2	Subpart 4120 - Grazing Management	The second issue is water rights. We have a water right on a spring on BLM ground. The BLM will not allow us to develop this spring unless the are allowed to share in the water rights with the BLM. We are wanting to develop the spring for all animals including wildlife. We should be able to develop the spring for all without BLM contoling the water rights.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	23	Subpart 4120 - Grazing Management	The rules should require rest after fire. The agency should require at least a full year of livestock rest after prescribed fire, and must disclose the environmental consequences of not providing such rest. Soils are far more sensitive to compaction and erosion after fire. Vegetation is also in a state of recovery. The new green shoots are essential to restoring plant vigor and biomass, but those same shoots are highly palatable to livestock. Failure to provide rest after fire is likely to lead to degrade range conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	9	Subpart 4120 - Grazing Management	The rules should require management of livestock to avoid conflicts with predators. Special attention should be given to facilitate recovery of ecologically functional populations of threatened gray wolves. Some allotments may need to be closed to give predator populations an opportunity to expand thrive while minimizing risks of human conflicts. Where grazing will continue in areas frequented by predators, permittees should be required to take all necessary steps to avoid conflicts and use non-lethal methods to prevent and limit depredation of livestock. See ODFW Non-Lethal Measures to Minimize Wolf-Livestock Conflict, http://dfw.state.or.us/Wolves/docs/ODFW_Non-lethal_Measures_130719.pdf , http://dfw.state.or.us/Wolves/non-lethal_methods.asp
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	3	Subpart 4120 - Grazing Management	The rules should not enshrine outdated livestock management tools. For instance, "improving livestock distribution" is not necessarily a good thing because it spreads the effects of livestock to areas that are currently spared the adverse effects of livestock grazing. Improved distribution homogenizes grazing effects and expands the ecological stress caused by livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	20	Subpart 4120 - Grazing Management	The rules should encourage BLM to make contingency plans that require the removal of livestock during droughts, and after droughts the agency should provide for long periods of rest and recovery before livestock are allowed to return so that plants can rebuild soil cover, biomass, and energy stores both above and below ground.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	21	Subpart 4120 - Grazing Management	The regulations should streamline the ability to implement range improvement projects, primarily water developments. It is crucial to recognize that water distribution is imperative and primary to success in any grazing strategy. This is in addition to strategic use and placement of supplements. Please ensure that priority is placed on development and distribution of water and also placement of supplement. Please also allow supplement use to be placed, in some circumstances, near water sources. This is important because many grazing permits have current terms and conditions prohibiting placement of salt or supplement within a certain distance of water. In outcome based grazing strategies, placement of salt and supplement very near water is often necessary to keep cattle at desired locations and to ensure animal health and productivity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	27	Subpart 4120 - Grazing Management	The regulations should streamline the ability to implement range improvement projects, primarily water developments (including water hauling locations). It is crucial to recognize that water distribution is imperative and primary to success in any grazing strategy. This is in addition to strategic use and placement of supplements (including salt). Please ensure that priority is placed on development and distribution of water and also placement of supplement. Please also allow supplement use to be placed, in some circumstances, near water sources. This is important because many grazing permits have current terms and conditions prohibiting placement of salt or supplement within a certain distance of water. In outcome based grazing strategies, placement of salt and supplement very near water is often necessary to keep cattle at desired locations and to ensure animal health and productivity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	18	Subpart 4120 - Grazing Management	The regulations shou ld revise the provisions regarding Exchange of Use Agreements to clarify that Exchange of Use will be linked to the respective state law regarding "fence out" and "open range." This issue is primarily focused on railroad "checkerboard" where the ownership of the various parcels are complicated and involve many different landowners. The current regulations seem to support that unfenced private lands in these areas are not avai lable to grazing permittees without a signed lease or court order. We are convinced that Nevada law, including case law and Attorney General opinions, have consistently held that Nevada, as a "fence out" state, grants permission to grazing "livestock running at large on the ranges or commons" (NRs 568.300) of unfenced private lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Matthews	Eugene and Heidi			1372	1	Subpart 4120 - Grazing Management	The new regulations should provide BLM with tools to quickly and efficiently permit range improvement projects.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Devlin	Todd			1120	1	Subpart 4120 - Grazing Management	The current restrictions on updating or improving existing cooperative range improvements are far too restrictive. (A real life example: We have water well that has been in existence far longer than the BLM itself. Developed during the homestead days. We wanted to increase and improve on storage capacity of livestock water. Pasture is a one section, 80% crested wheat of which BLM has given written permission to graze heavier than noted carrying capacity. Archeological findings have delayed water improvement and the ability to utilize pasture to any feasible level. Archeological find is signs of it being homesteaded) Recommendation: All existing cooperative range improvements should be immediately approved if they do not expand the footprint to any significant degree and due to the improvement allowing for a healthier ecosystem of historic uses of said unit of an allotment.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marks	Liz			1303		3 Subpart 4120 - Grazing Management	The BLM shall not interfere in any manner with any water rights or rights of way, and any provision in a grazing permit or preference that adversely effects water rights shall be invalid. If the government interferes or restricts in any manner, the use or access of a water right, the government must immediately pay on a monthly basis the fair market value of the water rights or the equivalent to the repeated willful trespass rate in that area (whichever is higher) to the owner of the water right. This payment is a statutory payment for the loss of use or access. It does not confer the right or use of any water right to the BLM or anyone outside the water right owner. This payment shall not be construed as a purchase nor shall it replace compensation that may be due under the 5th amendment or compensation due under any state law.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ball	Robert		CO	1083		1 Subpart 4120 - Grazing Management	Subpart 4120 should include a requirement that BLM must acquire legal public access to any permanent range improvement (fences, water developments, corrals, trails, land treatments, etc.) located on BLM administered lands, BEFORE authorizing new or presently unauthorized range improvements. BLM is spending range betterment funds (8100, 8200) and other federal funds on range improvements that they have no legal access to. Even where private lands blocking access to the subject BLM administered lands are currently owned by a grazing permittee, they may not always be owned by a BLM grazing permittee. As a present-day grazing permittee may not always be the private land owner, provisions that the grazing permittees must allow BLM administrative access provide no long-term guarantee of access, even to the BLM. In addition, this existing provision does not provide for public access to projects funded with federal taxpayer dollars (including those obtain by selling public land forage).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lanham	Miteshell	Lander County, NV	NV	1219		6 Subpart 4120 - Grazing Management	Streamlining the ability to implement range improvement projects, primarily water developments, is also important. It is crucial to recognize that water distribution is imperative and primary to success in any grazing strategy. Placement of salt or supplement near water is often necessary to keep cattle at a desired location and to ensure animal health and productivity, so please consider supplement placement, in some circumstances, to be allowed near water during the revision of the regulations. Priority needs to be placed on development and distribution of water and also on placement of supplements.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chew	Scott H.	Chew Livestock, Inc	UT	1491		8 Subpart 4120 - Grazing Management	Stewardship Agreements; BLM has never fulfilled their obligation to set up Stewardship Permits. There is enough experience and education in the ranching community to work such a program.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Devlin	Todd			1120		Subpart 4120 - Grazing Management 4	Recommendation: Current Allotment Management Plans (AMPs) do not allow permittees the ability to assist in the design their own AMPs. BLM does not take into consideration season of use, temperature, palatability, water placement, convenience, etc. Historically, BLM calculates carrying capacities in somewhat of a generic form based on type of soil, forage yield and calculated forage use percentage. Early in growing season all forage is more palatable and livestock are non-selective. As forage goes into dormancy palatability tends to decrease in "run off" areas and then "normal" areas, leaving "run in" areas (riparian) as the most selected to graze. As the seasons get warmer with less precipitation, less and less of a pasture is palatable and livestock tend not to migrate as far from water sources. Most AMPs under utilize during growing season and sometimes over utilize as forage goes into dormancy, leaving riparian zones in high demand. Due to shortages of manpower to design such complicated AMPs, BLM should consider allowing permit holders the ability to give proposals to the BLM that would be strongly considered to be allowed to implement.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228		Subpart 4120 - Grazing Management 26	Recognition of private property rights- BLM administered land is intermingled with private and state trust land in New Mexico. Ownership of base property, whether private land or privately owned water rights is a requirement to hold a grazing permit. As private land owners, permittees cannot be required to compromise their private property rights to hold a grazing permit. Private property rights are basic rights guaranteed under the Constitution. Water rights- The BLM is not in the livestock business and has no legitimate need to own water rights. Section 4120.3-9 and any other regulatory provision that relates to federal acquisition and ownership of water rights should be removed from these regulations. Revised regulations should include a prohibition of such acquisition and ownership
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	DeFord	Jenny	Salmon River Cattlemen's Association Inc.		1306		Subpart 4120 - Grazing Management 3	Range Improvement Projects: The grazing regulations should seek to streamline the process to approve and implement range improvements, particularly water development and distribution projects. Water is the limiting factor for most livestock operations across the arid west and limits the amount of habitat available to wildlife. Thus, a more development friendly regulatory framework would serve to allow the most limiting factor for both livestock production and wildlife populations to be addressed in a timely manner. Existing restrictions on the use and placement of nutritional supplements on public grazing lands should also be revised. Supplementation with products that are currently restricted and/or in locations that are currently prohibited will often be necessary or beneficial to successfully implement targeted grazing and outcome based grazing projects or other prescriptive grazing programs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Peila	William		OR	963		Subpart 4120 - Grazing Management 1	Please consider changing how allotments with wild horses are managed because rangeland health is at stake. The horse population needs to be maintained at the already assigned horse management levels, regardless whether adoption programs are successful or not. Great strides have been made in rangeland health since the implementation of the Taylor Grazing Act by Congress in 1934. Eighty-six years of progress in rangeland health is being erased by the overly gross numbers of wild horses degrading public lands. Many allotments have four or five times the designated numbers allowed. This is not sustainable. Horse numbers must be reduced to appropriate levels and maintained at those levels.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	3	Subpart 4120 - Grazing Management	Our ability to own range improvements was removed resulting in lost incentive for ranchers to fund range improvements and lost revenue for county governments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	14	Subpart 4120 - Grazing Management	once an allotment management plan is approved, range improvement implementing in that plan within the broad scope of the plan are not new decisions subject to administrative appeals or further NEPA analysis. Consider modifying the regulation regarding range improvements under an allotment management plan: "§ 4120.3-1(f) Conditions for range improvements. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion. The range improvements are not decisions subject to protest or appeal under Section 4160.2."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gooch	Scott and Kaila			1497	1	Subpart 4120 - Grazing Management	NEPA. This process seems painfully slow. When it takes years to approve somrthing as commonsense as rangeland water improvements, the system is broken.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mihal	Dianne	Stone Cabin Ranch, LLC		1326	3	Subpart 4120 - Grazing Management	NEPA for simple Range Improvemnets not being in line with the modern age and modern price point of these studies in general as well as EIS and EA timelines need to be addressed. These studies can be very lengthy and expensive and are being outsourced at the permittees expense in order to be completed. The mentality of if you want it done you will have to come up with the money yourself is not an option for most permittees. Range Improvements such as water improvements, maintenance, fences, corrals etc should be implemented under small actions and should not take 10 years due to personelle turnover etc or pushed off as "insignificant" by itself and then lumped into a larger action that will take 5-10 years. Another issue with "Range Improvements" is lack of accessibility. Many roads and access locations have not been maintained by the agencies due to lack of funds or lack of personelle. Permittees needs to be able to access locations with trailers for cattle needs and range improvement maintenance.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chew	Scott H.	Chew Livestock, Inc	UT	1491	5	Subpart 4120 - Grazing Management	Make better use of Section 4 permits; The regulations need to return to the use of section 4 permits, instead of requiring cooperative agreements. More would get done if permittees had ownership of the improvement. Our ranch has a multitude of projects BLM is just sitting on, some for 10 years or more, but we will not try to do them ourselves because of the ownership factor.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon			1227	5	Subpart 4120 - Grazing Management	Make better use of Section 4 permits; The regulations need to return to the use of section 4 permits, instead of requiring cooperative agreements. More would get done if permittees had ownership of the improvement. Our ranch has a multitude of projects BLM is just sitting on, some for 10 years or more, but we will not try to do them ourselves because of the ownership factor.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spotts	Richard		UT	1235	14	Subpart 4120 - Grazing Management	In allotments with known pronghorn antelope use, require permittees within a reasonable period of time to remove any barbed wire from the lowest wire on their range fences and replace it with smooth wire, to facilitate antelope movements without mortality.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spratling	Craig	N-1 Grazing Board Nevada	NV	808	1	Subpart 4120 - Grazing Management	I would like to request that the requirement that the BLM acquire the water rights for a project be removed. In states like Nevada the state will not issue a water right to the BLM because they do not meet all the requirments to hold a stockwater right. There are many projects that are being held up because of this requirement. It would be in the best interests of the land resource to relax this requirement and get many of these water improvements done by allowing the permittee to own the water rights.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Greenwood	Ariel		NM	1136	1	Subpart 4120 - Grazing Management	I am writing to suggest the BLM consider a shift that allows permittees to practice more management-intensive grazing, such as higher duration, shorter intensity grazes (including more AU for a shorter period of time) in the interest of supporting maximum plant recovery, maximize benefit to disturbance, and mitigate conflict with native predators.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cozzens	Paul	Iron County Commission	UT	1492	4	Subpart 4120 - Grazing Management	Grazing Management: Eliminate requirements to CCC with the RAC when preparing an allotment management plan or activity plan. The RAC is coordinated with when Range Land Health Standards are changed. It is impossible to coordinate with RAC on every grazing preference renewal action. a Improve Permitting Proficiencies through streamed-lined NEPA processes: EIS: Currently takes at least 5+ years to complete, example -Cedar City Field Office Resource Management Plan, started in 2010 and is still in draft form awaiting to be approved for public comment. Suggest these types of planning documents not exceed 3 years in preparation, completion, and a decision. Most grazing preference documents should not need an EIS. * Environmental Assessment (EA): Most often take the BLM 2 or 3 years to completerecommend EAs not exceed one year in preparation. * Categorical Exclusions used to determine if a project meets the criteria to be excluded from formal NEPA review. In most cases, grazing on allotments do not change nor do the circumstances change from year to year. Allow for a Categorical Exclusion to renew a grazing permit if it is determined that an allotment is making significant progress or continuing to attain Range Land Health Standards. Also, allow for a CX to renew a grazing permit if it is determined that the Range Land Health Standards are failing to be met; however, current livestock are not a causal factor.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	22	Subpart 4120 - Grazing Management	Further, the regulations should disallow supplemental feeding which has the potential to import weed seeds.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carney	Cheryl		TX	179	5	Subpart 4120 - Grazing Management	Forbid destruction of native vegetation to increase forage for livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Logan	donna		PA	221	1	Subpart 4120 - Grazing Management	Forbid destruction of native vegetation to increase forage for livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beavers	Nancy		TN	201	6	Subpart 4120 - Grazing Management	forbid destruction of native vegetation to increase forage for livestock
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	4	Subpart 4120 - Grazing Management	Fencing is for the convenience of a small number of private commercial livestock operators privileged to hold public land grazing privileges at little cost to themselves, but huge costs to other values. Fencing requires gates and cattleguards are often difficult to negotiate by both wildlife and the public. A study released in October 2009 shows that during a seven month period the Wyoming Game and Fish Department documented 146 instances of finding sage-grouse feathers or carcasses on or near a 4.7-mile section of barbed-wire fence. http://world-wire.com/news/0912160001.html . Also, the Colorado Division of Wildlife has prepared a report on the impacts of fences and how to mitigate them. Hanophy, W. 2009. Fencing with Wildlife in Mind. Colorado Division of Wildlife, Denver, CO. 36 pp http://web.archive.org/web/20110101134309/http://wildlife.state.co.us/NR/rdonlyres/20D5C775-55DD-4C6D-A5CF-C9B83FCEA69E/0/DOWFencingWithWildlifeInMind.pdf .
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1080	6	Subpart 4120 - Grazing Management	Federal Courts have ruled that the change to the BLM Grazing Regulations in RR 94 that allowed “conservation use” grazing permits are illegal.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Croasdale	Kathlene		WA	368	1	Subpart 4120 - Grazing Management	Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat for native predators.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	3	Subpart 4120 - Grazing Management	Determine if the impairment is permanent. Long term impairment without any measurable recovery occurring constitutes permanent impairment. Is there a documented program that will restore impaired productivity or quality of the environment? Has this program showed measurable improvements that completed restoration of the specific impairment? If no recovery program is underway or if recovery has not proven successful and grazing use continues as in the past, the impairment will be perpetuated indefinitely thus, effectively, be considered permanent. Allotments with impaired productivity or quality of environment should be noted and reported to the public. The measurable degree of impairment should also be reported.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	40	Subpart 4120 - Grazing Management	Current regulation discourages permittees/lessees from paying for water related range improvements if the BLM is instructed by this Regulation to file for these water rights in the name of the United States, "to the extent allowed by the law.. ".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	19	Subpart 4120 - Grazing Management	Current language discourages permittees/lessees from paying for water related range improvements if the BLM is instructed by this Regulation to file for these water rights in the name of the United States, "to the extent allowed by the law... ".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Devlin	Todd			1120	2	Subpart 4120 - Grazing Management	Cooperative Range Improvements are not being allowed to be maintained and improved upon even when the original improvement was a 100% funded with BLM Cooperative Range Improvement funds. (A real life example: We have a spring that was the sources of both livestock and humans as far back as the homestead days. BLM improved spring, 100% funded by BLM. We want to improve upon the site. Held up due to archeological finds of a homestead.) Recommendation: Archeological findings that cause restriction of use or not allowing for a range improvement should not include manmade disturbances allowed by the Homestead Act. Most of these lands are LU lands (Bankhead - Jones) that are currently managed by the BLM due to failed Federal Policy of the past. Past failed policy should never affect existing cooperative range improvements weather it be existing, new, or improved.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	29	Subpart 4120 - Grazing Management	Consider adopting rules that help achieve the grazing standards in Appendix 2 of AFSEEE's 1995 Grazing Suitability Report. We consider these to be minimum standards to meet the agency's legal requirements under FLPMA, ESA, CWA, MBTA, NEPA, etc.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bellwood	Samantha	Nevada Department of Agriculture	NV	1009	3	Subpart 4120 - Grazing Management	CFR 4120.2 - Allotment Management Plans: Allotment Management Plans (AMPs) are often outdated and do not reflect change in conditions or current management. NDA request BLM revise the AMP process to not prohibit flexibility as found in 4120.2(a)(3) "Specify the limits of flexibility, to be determined and granted..." but rather develop a wide array of options to guide livestock management to meet desired resource conditions. The department also believes NEPA should only analyze the permit, not the AMP. The BLM restricts themselves and the grazing permittees from making changes to livestock grazing management on an annual basis due to the limited flexibility and Record Decision. Ultimately this lack of flexibility hinders the grazing permittees from making progress towards rangeland health standards
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	29	Subpart 4120 - Grazing Management	Certain range improvements paid for by the applicant should be as Section 4 permits. When the costs of a project is shared between the government and an applicant, a cooperative agreement is appropriate and ownership is shared in proportion to the amounts contributed by either party.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	909	8	Subpart 4120 - Grazing Management	Certain range improvements paid for by the applicant should be as Section 4 permits. When the costs of a project is shared between the government and an applicant, a cooperative agreement is appropriate and ownership is shared in proportion to the amounts contributed by either party. · Title to range improvements should be with those who hold Section 4 permits and ownership shared on cooperative agreements in proportion to amounts contributed. · Range improvement funds are now being used for internal administrative costs and projects not related to improvement of livestock conditions. · Current regulation discourages permittees/lessees from paying for water related range improvements if the BLM is instructed by this Regulation to file for these water rights in the name of the United States, “ to the extent allowed by the law.. “. · Permittees or lessee should have more flexibility to accomplish management objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1079	9	Subpart 4120 - Grazing Management	Certain range improvements paid for by the applicant should be as Section 4 permits. When the costs of a project is shared between the government and an applicant, a cooperative agreement is appropriate and ownership is shared in proportion to the amounts contributed by either party. · Title to range improvements should be with those who hold Section 4 permits and ownership shared on cooperative agreements in proportion to amounts contributed. · Range improvement funds are now being used for internal administrative costs and projects not related to improvement of livestock conditions. · Current regulation discourages permittees/lessees from paying for water related range improvements if the BLM is instructed by this Regulation to file for these water rights in the name of the United States, “ to the extent allowed by the law.. “. · Permittees or lessee should have more flexibility to accomplish management objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Quammen	Betsy			1358	5	Subpart 4120 - Grazing Management	a few things I think BLM needs to implement in managing public lands: only non- lethal predator control; management of livestock that guarantees healthy riparian areas, fewer invasive species, and less erosion; emphasis on retiring allotments and working with conservation groups for permit buy-outs; protecting native species over the interests of individual permittees who plant non-native grasses for livestock; being accountable to the public about the consequences of public land grazing on water, wildlife, climate, and ecosystem health; and insuring the ongoing monitoring of lands so that BLM range cons and the public can recommend management changes when ecological thresholds are crossed by unsustainable stocking, drought, fire hazards, impacts on vulnerable species, and other factors.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barton	Cathy		MD	317		Subpart 4120 - Grazing Management 1	[comment:317-1; 104.04, 104.13]I favor including water quality monitoring as part of the land health evaluations.I favor including an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.I favor disclosing underlying Indigenous land claims and addressing environmental justice issues.I favor requiring grazing management to maintain and improve wilderness characteristics and other special values of grazed lands.I favor requiring use of the best available science in livestock grazing decisions.I favor setting a fair and equitable grazing fee based on comparable private land prices.[comment end]
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marnell	Lorraine		NM	998		Subpart 4120 - Grazing Management 1	*30% utilization.* If there is any one thing that would make grazing management more efficient, it would be conservative utilization, which would mean less riparian trampling, less invasive species, less erosion. A key document is Holechek's review of utilization rates and the benefits of conservative utilization for both the permittee's finances and the ecological condition of the land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Shepperson	Amy			1224		Subpart 4120 - Grazing Management 1	When we want to do a range improvement project on federal lands, it takes our local BLM office years to complete the process of getting it approved. This needs to be remedied. Most of the specialist who work in the office cite that their time is required first on oil and gas projects, and that is the first priority on where their time should be spent. This does not seem right to me. If multiple use is the motto of the BLM then oil and gas and grazing and recreation and all other uses of federal land should be equal and not be prioritized. A simple range improvement project approval should be able to be streamlined and completed more efficiently than what is currently happening.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goodwin	Jay	BLM Caliente Field Office		1154		Subpart 4120 - Grazing Management 3	Under the Coop Agreements subsection, identified permanent improvements include fences, wells, pipelines, spring developments, reservoirs, stock tanks. Under the Permit subsection, removable improvements include corrals, loading chutes, troughs for hauled water. My issue is that most corrals are as permanent as a spring development or reservoir, that fences and stock tanks can be temporary, and so on. I suggest it would be better to use language along the lines of range improvements that remain in place on the ground for the life of the grazing permit be considered permanent (Coop Agreements). Improvements that remain in place on the ground only during the Season of Use constitute temporary/removable improvements (Permits). Corrals, permanent (more or less) fences, spring developments, etc. would use Coop Agreements. Temporary livestock handling facilities (panels, portable loading chutes, troughs for waterhauls, temp/electric fences) would use Permits. I think the stay in place on the ground for life of permit versus season of use is a better way to differentiate permanent and temporary improvements. Another approach would be to single type of authorization (e.g. Coop Agreements) for range improvements, and eliminate the confusion of which type of authorization, Coop Agreement or Permit, applies to which type of range improvement.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307		Subpart 4120 - Grazing Management 18	The previous regulatory language more closely represents the concept that certain range improvements paid for by the applicant should be as Section 4 permits. When the costs of a project are shared between the government and an applicant, a cooperative agreement is appropriate, and ownership is shared in proportion to the amounts contributed by either party. Title to range improvements should be with those who hold Section 4 permits and ownership shared on cooperative agreements in proportion to amounts contributed.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harrington	Pam	Trout Unlimited		1193	3	Subpart 4120 - Grazing Management	Self-monitoring and acceptance of the results by the BLM should be a mandatory component to grazing permits. A monitoring regime (mostly photo-monitoring) should be put in place that is consistent and not burdensome. Self-reporting is accepted in many industry sectors and grazing lends itself perfectly to this system where there is not enough federal employees to collect data routinely.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	8	Subpart 4120 - Grazing Management	Section 4120.3-8 (c) Topic Range Improvement Funds Comment/Observation "(c) During the planning of the range development or range improvement programs, the authorized officer shall consult..." Action Requested Action: This consultation should include the state.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Logan	donna		PA	221	7	Subpart 4120 - Grazing Management	Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat for native predators.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tomera	Thomas		NV	797	10	Subpart 4120 - Grazing Management	Removal and reduction of fences: The habitat fragmentation that has occurred because of allotment fences is unnecessary. Simple fences that divide high country from low country should suffice. When a new fence is installed one should come out. Unmaintained fences are not only an eyesore, but they pose incredible hazards to wildlife, livestock, and land users! Reuse of those materials is a must and would be incredibly cost saving.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	Wilson Ranch, Inc	NV	1288	4	Subpart 4120 - Grazing Management	Range Improvement Projects: The grazing regulations should seek to streamline the process to approve and implement range improvements, particularly water development and distribution projects. Water is the limiting factor for most livestock operations across the arid west and limits the amount of habitat available to wildlife. Thus, a more development friendly regulatory framework would serve to allow the most limiting factor for both livestock production and wildlife populations to be addressed in a timely manner. Existing restrictions on the use and placement of nutritional supplements on public grazing lands should also be revised. Supplementation with products that are currently restricted and/or in locations that are currently prohibited will often be necessary or beneficial to successfully implement targeted grazing and outcome based grazing projects or other prescriptive grazing programs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harrington	Pam	Trout Unlimited		1193	2	Subpart 4120 - Grazing Management	Permitees with sensitive species, such as Greater Sage-Grouse and Lahontan Cutthroat Trout are sometimes penalized by agencies for the mere presence of these species. Reducing number of AUMs, and other restrictive applications when based only on the presence of the sensitive species and not the condition of the allotment make the species a liability to the producer.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	43	Subpart 4120 - Grazing Management	<p>NEW TEXT: §4120.3-2 Cooperative range improvement agreements. (a) The Bureau of Land Management may enter into a cooperative range improvement agreement with any person, organization, or other government entity for the installation, use, maintenance, and/or modification of range improvements or rangeland developments to achieve management or resource condition objectives. The cooperative range improvement agreement shall specify how the costs or labor, or both, shall be divided between the United States and cooperator(s). (b) Subject to valid existing rights, title to permanent range improvements such as fences, wells, and pipelines where authorization is granted after August 21, 1996 shall be in the name of the United States. The authorization for all new permanent water development such as spring developments, wells, reservoirs, stock tanks, and pipelines shall be through cooperative range improvement agreements. A permittees or lessees interest in contributed funds, labor, and materials will be documented by Bureau of Land Management to ensure proper credit for the purposes of 4120.3-5 and 4120.3-6 (c). (c) The United States shall have title to nonstructural range improvements such as seeding, spraying, and chaining. (d) Range improvement work performed by a cooperator or permittee on public lands or lands administered by the Bureau of Land Management does not confer the exclusive right to use the improvement or the land affected by the range improvement work. NEW TEXT: §4120.3-2 Cooperative range improvement agreements. (a) The Bureau of Land Management may enter into a cooperative range improvement agreement with any person, organization, or other government entity for the installation, use, maintenance, and/or modification of range improvements or rangeland developments to achieve management or resource condition objectives. The cooperative range improvement agreement shall specify how the costs or labor, or both, shall be divided between the United States and cooperator(s). (b) A permittees or lessees interest in contributed funds, labor, and materials will be documented by Bureau of Land Management to ensure proper credit for the purposes of 4120.3-5 and 4120.3-6 (c). (c) Title to improvements shall be shared by the United States and cooperator(s) in proportion to the actual amount of the respective contribution to the initial construction. (d) Range improvement work performed by a cooperator or permittee on public lands or lands administered by the Bureau of Land Management does confer the exclusive right to use the improvement or the land affected by the range improvement work. RATIONALE: Comment: Title shall belong to the contributors in accordance with their share of the contribution to the project. Range improvement works on a permittees or lessees allotment does give them an exclusive right to the use thereof so long as they</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text	
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	48	Subpart 4120 - Grazing Management	OLD TEXT: § 4120.5-1 Cooperation in Management. The authorized officer shall, to the extent appropriate, cooperate with the Federal, State, Indian tribal and local governmental entities, institutions, organizations, corporations, associations, and individuals to achieve the objectives of this part. NEW TEXT [adding "County"]:	§ 4120.5 Cooperation. § 4120.5-1 Cooperation in Management. The authorized officer shall, to the extent appropriate, cooperate with the Federal, State, County, Indian tribal and local governmental entities, institutions, organizations, corporations, associations, and individuals to achieve the objectives of this part. [60 FR 9965, Feb. 22,1995] § 4120.5-2 Cooperation in management with State, county, and Federal Agencies. Insofar as the programs and responsibilities of other agencies and units of government involve grazing upon the public lands and other lands administered by the Bureau of Land Management, or the livestock which graze thereon, the Bureau of Land Management will cooperate, to the extent consistent with applicable laws of the United States, with the involved agencies and government entities. The authorized officer shall cooperate with State, county, Federal agencies in the administration of the laws and regulations relating to livestock, livestock diseases, sanitation, and noxious weeds including: (a) State cattle and sheep sanitary or brand boards in control of stray and unbranded livestock, to the extent such cooperation does not conflict with the Wild Free-Roaming Horse and Burro Act of 1971 (16 U.S.C. et seq.); and (b) County or other local weed control districts in analyzing noxious weed problems and developing control programs for areas of the public lands and other lands administered by the Bureau of Land Management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	47	Subpart 4120 - Grazing Management	OLD TEXT: § 4120.3-9 Water rights for the purpose of livestock grazing on public lands. Any right acquired on or after August 21, 1995 to use water on public land for the purpose of livestock watering on public land shall be acquired, perfected, maintained and administered under the substantive and procedural laws on the State within such land is located. To the extent allowed by the law of the State within which the land is located, any such water right shall be acquired, perfected, maintained, and administered in the name of the United States NEW TEXT: § 4120.3-9 Water rights for the purpose of livestock grazing on public lands. Any right acquired on or after August 21, 1995 to use water on public land for the purpose of livestock watering on public land shall be acquired, perfected, maintained and administered under the substantive and procedural laws on the State within such land is located. RATIONALE: Comment: Most western states water law requires 'beneficial use' as the basis for a water right. The permittee or lessee puts the water to beneficial use, not the United States.	

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	45	Subpart 4120 - Grazing Management	OLD LANGUAGE: § 4120.3-6 Removal and compensation for loss of range improvements. (a) Range improvements shall not be removed from the public lands without authorization. (b) The authorized officer may require permittees or lessees to remove range improvements which they own on the public lands if these improvements are no longer helping to achieve land use plan or allotment goals and objectives or if they fall to meet the criteria under § 4120.3-4 of this title. (c) Whenever a grazing permit or lease is cancelled in order to devote the public lands covered by the permit or lease to another public purpose, including disposal, the permittee or lessee shall receive from the United States reasonable compensation for the adjusted value of their interest in authorized permanent improvements placed or constructed by the permittee or lessee on the public lands covered by the cancelled permit or lease. The adjusted value is to be determined by the authorized officer. Compensation shall not exceed the fair market value of the terminated portion of the permittees or lessees interest therein. Where a range improvement is authorized by a range improvement permit, the livestock operator may elect to salvage materials and perform rehabilitation measures rather than be compensated for the adjusted value. (d) Permittees or lessees shall be allowed 180 days from the date of cancellation of a range improvement permit or cooperative range improvement agreement to salvage material owned by them and perform rehabilitation measures necessitated by the removal. NEW LANGUAGE: §4120.3-6 Removal and compensation for loss of range improvements. (a) Range improvements shall not be removed from the public lands without authorization. (b) Whenever a grazing permit or lease is cancelled in order to devote the public lands covered by the permit or lease to another public purpose, including disposal, the permittee or lessee shall receive from the United States reasonable compensation for the adjusted value of their interest in authorized permanent improvements placed or constructed by the permittee or lessee on the public lands covered by the cancelled permit or lease. The adjusted value is to be determined by the authorized officer. Compensation shall not exceed the fair market value of the terminated portion of the permittees or lessees interest therein. Where a range improvement is authorized by a range improvement permit, the livestock operator may elect to salvage materials and perform rehabilitation measures rather than be compensated for the adjusted value. (c) Permittees or lessees shall be allowed 180 days from the date of cancellation of a range improvement permit or cooperative range improvement agreement to salvage material owned by them and perform rehabilitation measures necessitated by the removal. RATIONALE: Comment: Permittees or lessees should not be 'required' to remove range
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miller	Brooke	United States Cattlemen's Association	DC	1004	2	Subpart 4120 - Grazing Management	OLD LANGUAGE: "§ 4120.3-1(f) Conditions for range improvements. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. NEW LANGUAGE: Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Glebs	JOHN		MO	448	3	Subpart 4120 - Grazing Management	Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat for native predators.Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Sabrina		NV	798	5	Subpart 4120 - Grazing Management	Consideration of “blocking” lands together. Trade areas of lands that are within private boundries for lands that may include riparian areas or unique watershed opportunities. This would result in larger allotments. It’s something to think about.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tomera	Thomas		NV	797	9	Subpart 4120 - Grazing Management	Blocking of land: It was once practice of the BLM to consider trades with private land owners to attain specific sections that either made an entire large allotment or gave them access to riparian areas or other desirable areas. It should be considered again as an option to help reduce the number of small allotments that need evaluating, reduce fences, and allow for more fluidity across allotments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	27	Subpart 4120 - Grazing Management	At 4120.3-2 Cooperative range improvements: The WSGB comments that the current language at (a) be replaced with the language removed on 2/22/95. The WSGB comments that permittees should be allowed to construct certain range improvements with non-federal funds and, receive for those projects, a so called, Section 4 permit for these projects. Section 3 permittees should be allowed to own these projects according to the amount of non-BLM funds spent by these permittees on the project.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Major	Randell		NM	805	1	Subpart 4120 - Grazing Management	All pipeline that provide water for the livestock and wildlife should be burried and not left on top of the ground. Pipe on top of the ground is frozen in the winter and hot water in the summer.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	28	Subpart 4120 - Grazing Management	4120.3-9 Water rights for the purpose of livestock on public lands: The WSGB recommends a return to pre-RR reform 94 Regulation language that says that BLM will follow State Law with respect to water on Federal BLM lands, but NOT try to acquire water in JUST THEIR NAME ALONE for livestock water projects. The WSGB recognizes that there are certain administrative purposes for which the BLM would want to acquire water rights in just the name of the BLM, but livestock water projects in Wyoming also require that a beneficial use be identified with a request for a water right. The permittee who owns the livestock is the beneficial use, not the BLM. The WSGB comments that the revised Regulations should encourage that the beneficial user of livestock water on BLM lands be encouraged by regulation language to apply as a co-filer for livestock water projects on BLM lands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	46	Subpart 4120 - Grazing Management	<p>§ 4120.3-7 Contributions. The authorized officer may accept contributions of labor, material, equipment, or money for administration, protection, and improvement of the public lands necessary to achieve the objectives of this part. [49 FR 6452, Feb. 21, 1984] OLD TEXT: § 4120.3-8 Range improvement fund. (a) In addition to range developments accomplished through other resources management funds, authorized range improvement may be secured through use of the appropriated range improvement fund. One-half of the available funds shall be expended in the State and district from which they were derived. The remaining one-half of the fund shall be allocated, on a priority basis, by the Secretary for on-the-ground rehabilitation, protection and improvement of public rangeland ecosystems. (b) Funds appropriated for range improvement are to be used for investment in all forms of improvements that benefit rangeland resources including riparian area rehabilitation, improvement and protection, fish and wildlife habitat improvement or protection, soil and water resource improvement, wild horse and burro habitat management facilities, vegetation improvement and management. and livestock grazing management. The funds may be used for activities associated with on-the-ground improvements including the planning, design, layout, contracting, modification, maintenance for which Bureau of Land Management is responsible, and monitoring and evaluating the effectiveness of specific range improvement projects. (c) During the planning of the range development or range improvement programs, the authorized officer shall consult the resource advisory council, affected permittees, lessees, and members of the interested public NEW TEXT: § 4120.3-8 Range improvement fund. (a) In addition to range developments accomplished through other resources management funds, authorized range improvement may be secured through use of the appropriated range improvement fund. One-half of the available funds shall be expended in the State and district from which they were derived. The remaining one-half of the fund shall be allocated, on a priority basis, by the Secretary for livestock grazing management improvements, on-the-ground rehabilitation, protection and improvement of public rangeland ecosystems. (b) Funds appropriated for range improvement are to be used for investment in all forms of improvements that benefit livestock grazing management, rangeland resources including soil and water resource improvement vegetation improvement and management. funds may be used for activities associated with on-the-ground improvements including the planning, design, layout, contracting, modification, maintenance for which Bureau of Land Management is responsible, and monitoring and evaluating the effectiveness of specific range improvement projects. (c) During the</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	42	Subpart 4120 - Grazing Management	<p>§ 4120.3 Range improvements. OLD TEXT: § 4120.3-1 Conditions for range improvements. (a) Range improvements shall be installed, used, maintained, and/or modified on the public lands, or removed from these lands, in a manner consistent with multiple-use management. (b) Prior to installing, using, maintaining, and/or modifying range improvements on the public lands, permittees or lessees shall have entered into a cooperative range improvement agreement with the Bureau of Land Management or must have an approved range improvement permit. (c) The authorized officer may require a permittee or lessee to maintain and/or modify range improvements on the public lands under §4130.3-2 of this title. (d) The authorized officer may require a permittee or lessee to install range improvements on the public lands in an allotment with two or more permittees or lessees and/or to meet the terms and conditions of agreement. (e) A range improvement permit or cooperative range improvement agreement does not convey to the permittee or cooperator any right, title, or interest in any lands or resources held by the United States. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1989 (42 U.S.C. 4371 et. seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. NEW TEXT: §4120.3-1 Conditions for range improvements. (a) Range improvements shall be installed, used, maintained, and/or modified on the public lands, or removed from these lands, in a manner consistent with multiple-use management. (b) Prior to installing, using, maintaining, and/or modifying range improvements on the public lands, permittees or lessees shall have entered into a cooperative range improvement agreement with the Bureau of Land Management or must have an approved Section 4 range improvement permit. (c) The authorized officer may require a permittee or lessee to maintain and/or modify range improvements on the public lands under §4130.3-2 of this title. (d) The authorized officer may require a permittee or lessee to install range improvements on the public lands in an allotment with two or more permittees or lessees and/or to meet the terms and conditions of agreement. (e) A range improvement permit or cooperative range improvement agreement does not convey to the permittee or cooperator any right, title, or interest in any lands or resources held by the United States. (f) Proposed range improvement projects may be reviewed in accordance with the requirements of the National Environmental Policy Act of 1989 (42 U.S.C. 4371 et. seq.). Issuance of Range Improvement Permits and Cooperative Agreements for range improvements may be reviewed pursuant to a categorical exclusion. RATIONALE: Comment: Range improvements are 'normal ranching</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329	17	Subpart 4120 - Grazing Management	<p>§ 4120.2 Allotment management plans and resource activity plans. Allotment management plans or other activity plans intended to serve as the functional equivalent of allotment management plans may be developed by permittees or lessees, other Federal or State resource management agencies, interested citizens, and the Bureau of Land Management. When such plans affecting the administration of grazing allotments are developed, the following provisions apply: (a) An allotment management plan or other activity plans intended to serve as the functional equivalent of allotment management plans shall be prepared in careful and considered consultation, cooperation, and coordination with affected permittees or lessees, landowners involved, the resource advisory council, any State having lands or responsible for managing resources within the area to be covered by such a plan, and the interested public. The plan shall become effective upon approval by the authorized officer. The plans shall (1) Include terms and conditions under §§ 4130.3, 4130.3-1, 4130.3-2 4130.3-3, and subpart 4180 of this part; (2) Prescri be the livestock grazing practices necessary to meet specific resource objectives; (3) Specify the limits of flexibility, to be determined and granted on the basis of the operator's demonstrated stewardship, within which the permittee(s) or lessee(s) may adjust operations without prior approval of the authorized officer; and (4) Provide for monitoring to evaluate the effectiveness of management actions in achieving the specific resource objectives of the plan. (b) Private and State lands may be included in allotment management plans or other activity plans intended to serve as the functional equivalent of allotment management plans dealing with rangeland management with the consent or at the request of the parties who own or control those lands. (c) The authorized officer shall provide opportunity for public participation in the planning and environmental analysis of proposed plans affecting the administration of grazing and shall give public notice concerning the availability of environmental documents prepared as a part of the development of such plans, prior to implementing the plans. The decision document following the environmental analysis shall be considered the proposed decision for the purposes of subpart 4160 of this part. (d) A requirement to conform with completed allotment management plans or other applicable activity plans intended to serve as the functional equivalent of allotment management plans shall be incorporated into the terms and conditions of the grazing permit or lease for the allotment. (e) Allotment management plans or other applicable activity plans intended to serve as the functional equivalent of allotment management plans may be revised or terminated by the authorized officer after consultation, cooperation, and coordination with the affected permittees or lessees, landowners involved,</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	10	Subpart 4120 - Grazing Management	<p>Water rights The BLM needs to clarify the use of water for livestock and wildlife on BLM lands when the BLM does not own the water right. For example, a local permittee recently applied to install a waterline from an existing spring to a trough to create an addition water source to create better grazing distribution. The BLM denied permission for the project based on the permittee owning the water right on the spring and not the BLM. The BLM believes they should be granted at least a portion of the water right in order to proceed with the project. The UCCA does not believe the BLM regulations require the BLM to own these rights in order to allow a water infrastructure project to take place on BLM lands. We believe the regulations and policies should be clarified that the BLM does not need to own water rights for the water to be used on BLM lands.</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	15	Subpart 4120 - Grazing Management	<p>Water rights It is crucial to recognize that water distribution is imperative and at the core of operating a successful livestock grazing plan for the purpose of livestock grazing on public lands. CFB policy supports a livestock permittee's right to water developed by the lessee in accordance with state water law. Section 4120.3-9, Water rights for the purpose of livestock grazing on public lands should be amended to incorporate new language with a provision that recognizes state water law.</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hall	D. Shane	Crawford Cattle LLC	NV	615	4	Subpart 4120 - Grazing Management	-Water Developments -If the bureau is serious about controlling fuel load and invasive species, livestock grazers need to have the ability to responsibly develop existing springs and current water sources. If the regulatory burdens were reduced in this area, even allowing for wells to be drilled, we could see a dramatic improvement in range health and a more natural fire cycle. This will allow for a greater area of the range to be grazed thus reducing the impact on any one water development as well as reducing the fuel load overall.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Major	Randell	New Mexico Cattle Growers' Association	NM	1365	1	Subpart 4120 - Grazing Management	Use of Ecological Site Descriptions (ESDs) should not be part of decision making because they are inaccurate and incomplete in development and untested. These ESDs are continually being updated and changed, therefore decisions and management changes should not be based on this incomplete information. Monitoring is required over time to provide meaning information about rangeland health and to discover trends. BLM needs to use consistent methods that remove personal opinion and bias, actually measuring something and can be used across the majority of BLM allotments and provides understandable information that can be defended.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	3	Subpart 4120 - Grazing Management	TNC recognizes that vegetation biomass can accumulate slowly over several moderately wet years or quickly following a year of abundant moisture. This additional biomass can be viewed as habitat, forage, or fuel for the next wildfire and needs to be managed for all three purposes. In some cases where invasive annuals contribute to catastrophic wildfire risk, domestic grazing can be used as a tool to manage this major threat to western rangelands. TNC understands that current livestock grazing permits rarely allow for easy adjustments to these types of surplus conditions in a time-effective manner.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	13	Subpart 4120 - Grazing Management	The United States holds title to an improvement authorized by a Cooperative Range Improvement Agreement constructed before March 1984 and after August 1995. See 43 C.F.R. § 4120.3-2 (1995) ("Subject to valid existing rights, title to permanent range improvements such as fences, wells, and pipelines where authorization is granted after August 21, 1995 shall be in the name of the United States."); BLM Handbook H-4120-1 at §.32 ("Title of nonstructurals or nonremovables must be in the United States."). Since 1995, the use of a Range Improvement Permit is limited to authorizing the construction of a removable range improvement and a permittee may hold title removable improvements. See 43 C.F.R. § 4120.3-3(b)(1995) ("The permittee or lessee may hold the title to authorized removable range improvements used as livestock handling facilities such as corrals, creep feeders, and loading chutes, and to temporary structural improvements such as troughs for hauled water."). If a permittees grazing permit is cancelled or reduced because the BLM will no longer permit grazing in that allotment, the grazing permittees are entitled to compensation for their interest in the improvement. 43 U.S.C. 1752(g); 43 C.F.R. § 4120.3-6(C)(1995) (" . . .the permittee or lessee shall receive from the United States reasonable compensation for the adjusted value of their interest in authorized permanent improvements placed or constructed by the permittee or lessee on the public lands covered by the cancelled permit or lease."). Pursuant to Section 4 of the TGA, permittees can install and own range improvements. See 43 U.S.C. §315f. DOI deleted the corresponding rule in response to environmental group objections without an adequate rationale for doing so. The Proposed Rule should permit improvements owned by the permittee. This will also improve the ability of permittees to apply for, and receive, financing for range improvement projects since the permittee and any funding party will have certainty as to title and, therefore, security in an interest in the improvements. Finally, the BLM should ensure that the Proposed Rule provides that grazing fees generated by livestock grazing permits are put directly back into grazing improvements and administration. These funds should be earmarked and tracked to their terminus in livestock grazing management rather than BLM's day-to-day administration. This will ensure that public land grazing projects benefit the permittee, the land, and the resources.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Grue	Clinton		MT	1049	3	Subpart 4120 - Grazing Management	The timeframe for approval of range improvement projects needs to be shortened. Many times a permittee is trying to coordinate a project that involves public and private land that is partially funded by Equip through the NRCS. Add to that contractor scheduling dooms some projects before they can get to the planning stage.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	18	Subpart 4120 - Grazing Management	The regulations should streamline the ability to implement range improvement projects, primarily water developments. It is crucial to recognize that water distribution is imperative and primary to success in any grazing strategy. NCA suggests modifying the regulation regarding range improvements under an allotment management plan: "§ 4120.3-1(f) Conditions for range improvements. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion. The range improvements are not decisions subject to protest or appeal under Section 4160.2."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	14	Subpart 4120 - Grazing Management	The regulations should ensure that every feasible option is pursued before any restrictive actions is taken against grazing. Before imposing grazing restrictions or seeking changes in livestock stocking rates or seasons of permitted use, identify and implement all economically and technically feasible livestock distribution, forage production enhancement, weed control programs, prescribed grazing systems, off-site water development by the water rights holder, shrub and pinyon/juniper control, livestock salting/supplementing plans, and establishment of riparian pastures and herding. The grazing regulations must assure that all grazing management actions and strategies fully consider impacts on property rights of in holders and consider the potential impacts of such actions on grazing animal health and productivity. The regulations should streamline the ability to implement range improvement projects, primarily water developments. It is crucial to recognize that water distribution is imperative and primary to success in any grazing strategy. We suggest modifying the regulation regarding range improvements under an allotment management plan: "§ 4120.3-1(f) Conditions for range improvements. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion. The range improvements are not decisions subject to protest or appeal under Section 4160.2."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	13	Subpart 4120 - Grazing Management	The regulations should ensure that every feasible option is pursued before any restrictive actions is taken against grazing. Before imposing grazing restrictions or seeking changes in livestock stocking rates or seasons of permitted use, identify and implement all economically and technically feasible livestock distribution, forage production enhancement, weed control programs, prescribed grazing systems, off-site water development by the water rights holder, shrub and pinyon/juniper control, livestock salting/supplementing plans, and establishment of riparian pastures and herding. The grazing regulations must assure that all grazing management actions and strategies fully consider impacts on property rights of in holders and consider the potential impacts of such actions on grazing animal health and productivity. The regulations should streamline the ability to implement range improvement projects, primarily water developments. It is crucial to recognize that water distribution is imperative and primary to success in any grazing strategy. We suggest modifying the regulation regarding range improvements under an allotment management plan: "§ 4120.3-1(f) Conditions for range improvements. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion. The range improvements are not decisions subject to protest or appeal under Section 4160.2."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	24	Subpart 4120 - Grazing Management	The regulations should also clarify that the issuance of cooperative range improvement agreements or range improvement permits should not be tied to extraneous requirements for permit administration or other concessions. A growing, and disturbing, trend has emerged whereby issuance of range improvement agreements or permits by BLM has been linked to a rancher's willingness to take unrelated actions, or to not act, as a condition for the issuance of the agreement or permit. Range improvements are essential to proper management of the public rangelands and should not be used as leverage to obtain unrelated concessions from the permittee.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Farr	Roy			1243	4	Subpart 4120 - Grazing Management	The Range Improvement fund should only be used directly for range improvement, not for general administrative purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	27	Subpart 4120 - Grazing Management	The harsh reality is that targeted grazing, once implemented for fuels management will have to occur indefinitely to control and manage annual invasive grasses. This management tool can help control their abundance and fuel load, but will not eliminate them. The timing and duration of grazing, as well as stock density may change across time, and some areas eventually may not need treatment every year, but grazing will have to occur in perpetuity, in most years. Given this reality, it is appropriate to move toward permanent water developments that are accessible every year. The greater the reliability of each component of the system developed to address the problem (water in this case), the greater the probability of success and sustained use of the tool.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	15	Subpart 4120 - Grazing Management	The grazing permit renewal process has become unworkable. The process is too expensive, slow, and complicated. Grazing permits should be considered as continuation of an ongoing process. Unless changes are being made to the permit, they should be renewed as a categorical exclusion. Regulatory language regarding range improvements should be changed to: OLD TEXT "§ 4120.3-1(f) Conditions for range improvements. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. NEW TEXT "§ 4120.3-1(f) Conditions for range improvements. Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion." We support targeted grazing as a fine fuel management tool. The regulations will better facilitate use of this tool by incorporating the following changes: * The issuance of targeted grazing permits should be issued under programmatic NEPA (including this EIS) and site-specific applications categorically excluded from NEPA analysis. * Targeted grazing authorizations should be separate from regular grazing authorizations. That is, the Animal Unit Months (AUM) authorized by such permits should not count as or reduce the number of AUMs permitted under existing grazing preference or term permit. * Targeted grazing authorizations should not conflict with existing grazing preference or term permits. * BLM Instruction Memorandum No. 2018-109 provides direction so that targeted grazing authorizations can be issued and administered with the appropriate flexibility necessary to achieve the desired management objectives.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbetts	Ron	Prairie County Cooperative State Grazing District		1456	1	Subpart 4120 - Grazing Management	The federal government should not hold water rights on federal grazing land, as they cannot show beneficial use. At Statehood the federal government gave all waters within the state to the state, excluding navigable water.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cockrell	Will & Debra		CA	1017	5	Subpart 4120 - Grazing Management	-The Federal Agencies, should be required to allow livestock permit owners to develop and maintain water resources on their permits, where the permit owner already owns water rights or where a new water development is in the best interest of the overall range. For the benefit of both Livestock and Wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Hank	Nevada State Grazing Board N2 District	NV	1471	3	Subpart 4120 - Grazing Management	The Board strongly suggests that the AMP be the first place a new Range Conservationist should go to determine where things stand with a specific allotment and allows for an easy transition to continue forward in managing the allotment. The N-2 Board strongly recommends making AMPs the priority management focus for all grazing allotments in Nevada. Through flexibility, the BLM would initially provide the permittee a list of resource issues or concerns on the allotment to be addressed and allow for the permittee, who tends to be the most knowledgeable individual regarding the allotment, the opportunity to identify alternatives to address those concerns over a designated timeframe. The permittee could then provide a draft outline of the AMP to BLM for review and consideration. The proposed AMP could be field verified through a BLM team review to ascertain that all issues are addressed. If the plan meets the necessary requirements, the BLM could submit the draft AMP for public review and comment along with an EA. Based on the Board's experience, this approach will save resources that would typically be spent by BLM trying to accomplish a similar goal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1078	1	Subpart 4120 - Grazing Management	Takes too long to get approval for any projects either new range improvements or maintenance on existing range improvements. Part of the rules a permittee must maintain existing improvements but BLM delays or denies you so you can't do them so why does it take years for approval. · NRCS will not do any EQUIP projects on BLM because it takes too long to get approval for a range improvement. Eliminate the red tape so things get approved faster and not take so long.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	17	Subpart 4120 - Grazing Management	Subpart 4120.3-9 - Water rights for the purpose of livestock grazing on public lands It is crucial to recognize that water distribution is imperative and at the core of operating a successful livestock grazing plan. AFBF policy supports a livestock permittee's right to water developed by the lessee in accordance with state water law. Section 4120.3-9, Water rights for the purpose of livestock grazing on public lands should be amended to incorporate new language with a provision that recognizes state water law. Section 4120.3-9 should be modified (REVISE) as follows: "In states where water law does not authorize livestock water rights to be owned by non-livestock owners, including federal agencies, BLM will allow livestock permit owners who are eligible to own livestock water rights to develop and maintain their state water rights through authorization of water developments which will provide for improved livestock distribution on a grazing allotment."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	5	Subpart 4120 - Grazing Management	Subpart 4120.3 Range Improvements The impetus behind this section, that range improvements belong to the federal government and that the permittee can force to install, modify, remove, or prevented from using or maintaining them; is absurd. It has resulted in a serious decline of privately funded projects that could have benefitted wildlife, livestock, and the rangeland. We would suggest that this be removed or modified to create a cooperative approach to range improvements. 4120.3-9 Water Rights for the Purpose of Livestock on Public Lands We recommend returning to the pre 1994 language. BLM should follow state laws with respect to water on Federal BLM lands. For example, in Wyoming water is the property of the State.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	16	Subpart 4120 - Grazing Management	Subpart 4120.2 subpart (2) - Allotment management plans and resource activity plans Reduction of fuel loads through livestock grazing as a tool in the removal of excess grasses, should be categorized as fuel reduction activity and be developed under emergency/public safety actions and not be subject to NEPA reviews. Section 4120.2 subpart 2 should be modified as follows: (2) Prescribe the livestock grazing practices necessary to meet specific resource objectives, including reductions in fine fuel loads which need to be reduced to fuel levels below the established designated levels for the fuel loads determined for the allotment; We also recognize that the objective of using livestock grazing as an effective tool for fuel reduction can be accomplished through edits to adjustments for 4130.5 Free-use grazing. Section 4130.5 should be amended as follows: (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds; (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire; or (5) Targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO. Further edit by striking (REMOVE) subsection (e): "(e) The kinds of indigenous animals authorized to graze under specific terms and conditions" Further edit (REVISE) at subsection (f) as follows: (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; Further ADD this new subsection: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218		Subpart 4120 - Grazing Management 4	Subpart 4120.2 Allotment Management Plans and Resource Activity Plans Allotment Management Plans (AMP) should include more opportunities for flexibility. Three such instances where this would be beneficial are: (1) adding fuels reduction provisions with resource triggers, such as when designated fuel load levels exceed ten percent or when livestock grazing has utilized less than ninety percent of allowable forage. (2) the voluntary use of targeted livestock grazing to meet nontraditional range goals, such as to reduce vegetative stature or targeting invasive species. (3) changes to timing and stocking density to achieve rangeland management objectives. These could be based off a weather event (i.e. late spring) or an adaption over time to better meet pasture variations. Such uses would allow for better management of the landscape as a whole. This flexibility should be written into the AMP and categorically excluded from further analysis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334		Subpart 4120 - Grazing Management 16	Section 4120.5-2(b): Language should add cooperative weed management areas (CWMAs) to this section. They do not have the same legal authorities of weed districts but play an integral role for managing noxious weeds in many areas that are without weed districts.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334		Subpart 4120 - Grazing Management 15	Section 4120.3-2: Rangeland improvements that benefit the management of livestock, and reduce or eliminate the potential or probability that grazing will have an adverse effect on other resource values, and/or will improve the management of other resource values should be encouraged and implemented as rapidly as possible. At times, the permittee may have the resources to develop these improvements and do so much quicker than the agency. There needs to be mechanisms and incentives that promote permittee investment in, and quick development of projects that are readily seen by the management agency and the permittee as win-win outcomes. This should include title to projects and developments that the permittee funds (including third party environmental inventories, assessments and analyses). If title can't be provided, then grazing fees should be waved until the permittee recovers their cost of the project. Any new regulations should seek to promote the rapid application of win-win outcomes, not establish barriers to good ideas and actions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262		Subpart 4120 - Grazing Management 10	Section 4120.3-1(f) Conditions for range improvements. REMOVE TEXT: "(f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part." REPLACE WITH FOLLWING TEXT: "Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion. The range improvements are not decisions subject to protest or appeal under Section 4160.2."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204		Subpart 4120 - Grazing Management 21	Section 4120.3 of the grazing regulations address conditions for range improvements. A major concern to Defenders is the proliferation of non-native vegetation which has cascading adverse effects throughout the ecosystem (Reisner et al. 2013; Condon and Pike 2018; Meyer 2011; Vavra et al. 2007). The regulations therefore must assert that range improvements involving vegetation will not involve seeding of or otherwise encouraging the use of species that are non- native to the region and will be designed with the objective of restoring fully functional native ecosystems within the natural range of variability.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klein	Tammy	Central Valley and Penasco Soil and Water Conservation Districts	NM	1144	8	Subpart 4120 - Grazing Management	Section 4 permits should be title to range improvement paid for the permittee. Permittees use their own money- less cost to the Federal Government.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	7	Subpart 4120 - Grazing Management	Section 4120.3-4 Topic Standards, design and stipulations Comment/Observation "...shall specify the standards, design, construction and maintenance criteria for the range improvements and other additional conditions and stipulations or modifications..." Action Requested Action: The Department recommends these standards be developed in cooperation and coordination with the state, due to the state's authority to management of fish and wildlife resources.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	Peter	Riddle Ranches, Inc.		1211	1	Subpart 4120 - Grazing Management	Repair and maintenance of Range Improvements should be a simple process especially when the BLM have recognized them for over 50 years. Taking years to get permission to repair a washed-out dirt stock tank is mismanagement. Same with getting permission to clean out / maintain dirt stock tanks regard less if there is a file on then or not. These tanks were established prior to 1965 and are recognized and put on BLM maps so they are established on the range. These improvements benefit both the permittee and the wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	7	Subpart 4120 - Grazing Management	Regulation to manage, fix, repair or replace existing range developments should be updated to reflect the current use of motorized equipment and other tools. The ability to repair fences, stock water, corrals and other developments on public land should be granted through an equal, and streamlined process through each field or district office. EXisting projects should not require new NEPA or other public processes to get needed, time sensitive work completed. The use of motorized equipment for improvement projects must be allowed, as the old regulations requiring permittees not to use motorized equipment is outdated and completely impractical. Decisions should be made between field managers and permittees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Rama			1191	5	Subpart 4120 - Grazing Management	Reducing the amount of grazing on an allotment leads to an increase in fire hazards by allowing vegetation to cure longer than it should, thus creating a landscape that is perfect for catastrophic wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	5	Subpart 4120 - Grazing Management	Range Improvement Projects: The grazing regulations should seek to streamline the process to approve and implement range improvements, particularly water development and distribution projects. Water is the limiting factor for most livestock operations across the arid west and limits the amount of habitat available to wildlife. Thus, a more development friendly regulatory framework would serve to allow the most limiting factor for both livestock production and wildlife populations to be addressed in a timely manner. Existing restrictions on the use and placement of nutritional supplements on public grazing lands should also be revised. Supplementation with products that are currently restricted and/or in locations that are currently prohibited will often be necessary or beneficial to successfully implement targeted grazing and outcome based grazing projects or other prescriptive grazing programs.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	18	Subpart 4120 - Grazing Management	Please amend 4120.3-9 with [this] wording as a new first paragraph for this section... ORIGINAL 2006 TEXT Any right that the United States acquires to use water on public land for the purpose of livestock watering on public land will be acquired, perfected, maintained, and administered under the substantive and procedural laws of the state within which such land is located. COMMENTER'S SUGGESTED NEW TEXT "In states where water law does not authorize livestock water rights to be owned by non-livestock owners, including federal agencies, BLM will allow livestock permit owners who are eligible to own livestock water rights to develop and maintain their state water rights through authorization of water developments which will provide for improved livestock distribution on a grazing allotment."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	14	Subpart 4120 - Grazing Management	Please amend 4120.2 (sub 2) with the underlined wording... ORIGINAL 2006 TEXT (2) Prescribe the livestock grazing practices necessary to meet specific resource objectives; COMMENTER'S SUGGESTED NEW TEXT (2) Prescribe the livestock grazing practices necessary to meet specific resource objectives, including reductions in fine fuel loads which need to be reduced to fuel levels below the established designated levels for the fuel loads determined for the allotment;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Myrin	Nils		UT	1104	3	Subpart 4120 - Grazing Management	Opportunities for seeding improved grass mixes should be sought. The increase in production and the potential for residual and ground cover created by improved pasture is a great benefit to soil health, water shed qualities and wildlife.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	44	Subpart 4120 - Grazing Management	OLD TEXT: § 4120.3-3 Range improvement permits. (a) any permittee or lessee may apply for a range improvement permit to install, use, maintain, and/or modify range improvements that are needed to achieve management objectives for the allotment in which the permit or lease is held. The permittee or lessee shall agree to provide full funding for construction, installation, modification, or maintenance. Such range improvement permits are issued at the discretion of the authorized officer. (b) The permittee or lessee may hold the title to authorized removable range improvements used as livestock handling facilities such as corrals, creep feeders and loading chutes, and to temporary improvements such as troughs for hauled water. (c) Where a permittee or lessee cannot make use of the forage available for livestock and an application for temporary nonuse or conservation use has been denied or the opportunity to make use of the available forage is requested by the authorized officer, the permittee or lessee shall cooperate with the temporary authorized use of forage by another operator, when it is authorized by the authorized officer following consultation with the preference permittee(s) or lessee(s). (2) The authorized officer may mediate disputes about reasonable compensation and, following consultation with the interested parties, make a determination concerning the fair and reasonable share of operations and maintenance expense and compensation for use of authorized improvements and facilities. (c) A permittee shall be reasonably compensated for use and maintenance of improvements and facilities by the operator who has an authorization for temporary grazing use. NEW TEXT: §4120.3-3 Range improvement permits. (a) Pursuant to Section 4 of the Taylor Grazing Act, any permittee or lessee may apply for a range improvement permit to install, use, maintain, and/or modify range improvements that are needed to achieve management objectives for the allotment in which the permit or lease is held. The permittee or lessee shall agree to provide full funding for construction, installation, modification, or maintenance. (b) The permittee(s) own the projects authorized by Section 4 permits. (c) A permittee shall be reasonably compensated for use and maintenance of improvements and facilities by the operator who has an authorization for temporary grazing use. (d) The authorized officer may mediate disputes about reasonable compensation and, following consultation with the parties involved, make a determination concerning the fair and reasonable expenses and compensation for use of the authorized improvements and facilities. RATIONALE: Comment: The Taylor Grazing Act of 1934 authorizes permittees and lessees to install range improvement on public lands, be they permanent or removable and they belong to the permittee. Section 4 of the Taylor Grazing Act of 1934 also states that said
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	21	Subpart 4120 - Grazing Management	OLD TEXT: "§ 4120.3-1(f) Conditions for range improvements. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. COMMENTER'S SUGGESTED NEW TEXT: "§ 4120.3-1(f) Conditions for range improvements. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	50	Subpart 4120 - Grazing Management	OLD TEXT (d) The authorized officer may require a permittee or lessee to install range improvements on the public lands in an allotment with two or more permittees or lessees and/or to meet the terms and conditions of agreement. NEW TEXT (d) The authorized officer may require a permittee or lessee to install range improvements on the public lands in an allotment with two or more permittees or lessees and/or to meet the terms and conditions of COOPERATIVE RANGE IMPROVEMENT agreement OR RANGE IMPROVEMENT PERMIT. RATIONALE See insertions and deletions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	33	Subpart 4120 - Grazing Management	OLD TEXT (b) Prior to installing, using, maintaining, and/or modifying range improvements on the public lands, permittees or lessees shall have entered into a cooperative range improvement agreement with the Bureau of Land Management or must have an approved range improvement permit. NEW TEXT NONE RATIONALE "cooperative range improvement agreement" and "range improvement permit" need to be defined.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	39	Subpart 4120 - Grazing Management	OLD TEXT (b) Funds appropriated for range improvements are to be used for investment in all forms of improvements that benefit rangeland resources including riparian area rehabilitation, improvement and protection, fish and wildlife habitat improvement or protection, soil and water resource improvement, wild horse and burro habitat management facilities, vegetation improvement and management, and livestock grazing management. The funds may be used for activities associated with on-the-ground improvements including the planning, design, layout, contracting, modification, maintenance for which the Bureau of Land Management is responsible, and monitoring and evaluating the effectiveness of specific range improvement projects. (c) During the planning of the range development or range improvement programs, the authorized officer shall consult, coordinate and cooperate with the resource advisory council, affected permittees, lessees, and members of the interested public. NEW TEXT (c) Prior to the planning of the range development or range improvement programs, the authorized officer shall consult, coordinate and cooperate with the resource advisory council, affected permittees, lessees, and members of the interested public.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	31	Subpart 4120 - Grazing Management	OLD TEXT (a) An allotment management plan or other activity plans intended to serve as the functional equivalent of allotment management plans shall be prepared in careful and considered consultation, cooperation, and coordination with affected permittees or lessees, landowners involved, the resource advisory council, any State having lands or responsible for managing resources within the area to be covered by such a plan, and the interested public. The plan shall become effective upon approval by the authorized officer. The plans shall- NEW TEXT (a) An allotment management plan or other activity plans intended to serve as the functional equivalent of allotment management plans shall be prepared in careful and considered consultation, cooperation, and coordination with affected permittees or lessees, landowners involved, the resource advisory council, any State having lands or responsible for managing resources within the area to be covered by such a plan, . The plan shall become effective upon approval by the authorized officer. The plans shall-

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	41	Subpart 4120 - Grazing Management	OCA suggests modifying the regulation regarding range improvements under an allotment management plan: "§ 4120.3-1(f) Conditions for range improvements. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion. The range improvements are not decisions subject to protest or appeal under Section 4160.2."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cerri	Ronald		NV	1060	5	Subpart 4120 - Grazing Management	It is crucial to recognize that water distribution is imperative and primary for success in any grazing strategy. Therefore, the new regulations should streamline the ability to implement range improvement projects, such as water developments, to allow for better distribution of livestock, thus sustaining the resource. Development of water sources allows for wider distribution of livestock utilizing more areas of the allotment.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	23	Subpart 4120 - Grazing Management	In addition, the regulations should require that all fences installed as rangeland improvements are designed, constructed, and maintained to facilitate wildlife migration and minimize disturbance to wildlife, and unnecessary fences are removed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	29	Subpart 4120 - Grazing Management	In addition, Idaho has a long history of working closely with BLM to train and equip Rangeland Fire Protection Associations (RFPA). In fact, BLM's National Wildland Fire Cooperator Coordinator has used Idaho as a model in his outreach to other western states in encouraging them to institute similar programs. Idaho RFPAs have done a remarkable job of assisting BLM in responding to range fires and coordinating efforts to manage wildfires. BLM's regulations should codify and promote the expansion of RFPAs as a means of effectively dealing with range fires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	25	Subpart 4120 - Grazing Management	If targeted grazing is implemented it should never be based upon hard off and on dates. Start and end dates of plant growth at the same site can vary by at least 2-3 weeks across years, sometimes even more. Grazing decisions should focus on plant growth stages growth stages and physiological needs of the desired plants at each growth stage. These seldom if ever correspond to a hard date. Dates may make some decisions simple and easy, but grazing management, regardless of the intended goal, is not a simple and easy process. Hard dates over simplify a complex process and lead to less successful outcomes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	18	Subpart 4120 - Grazing Management	Grazing Permit Renewals. The grazing permit renewal process has become unworkable. The process is too expensive, slow, and complicated. Grazing permits should be considered as continuation of an ongoing process. Unless changes are being made to the permit, they should be renewed as a categorical exclusion. Regulatory language regarding range improvements should be changed to: "§ 4120.3-1(f) Conditions for range improvements. (f) Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davis	Tyler	Arizona Farm Bureau Federation	AZ	1122	9	Subpart 4120 - Grazing Management	Grazing Permit Renewals Processing grazing permit renewals is too complicated, costly, and time-consuming, causing a huge backlog and straining limited budgets. The regulation must make clear in Part 4100 that a permit renewal that does not increase permitted use by more than 10% is a categorical exclusion that does not require an environmental assessment or environmental impact statement. Furthermore, once an allotment management plan is approved, range improvement implementing that plan within the broad scope of the plan are not new decisions subject to administrative appeals or further NEPA analysis. Consider modifying the regulation regarding range improvements under an allotment management plan: OLD TEXT "§ 4120.3-1(f) Conditions for range improvements. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion. The range improvements are not decisions subject to protest or appeal under Section 4160.2." NEW TEXT "§ 4120.3-1(f) Conditions for range improvements. Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion. The range improvements are not decisions subject to protest or appeal under Section 4160.2." AZFB believes that a cooperative permit, in which the BLM takes partial ownership of a permitted improvement, should not be a condition in receiving a grazing permit when the rancher is financing or transferring ownership of an improvement. Instead, the regulation should go back to the format of the 1995 Grazing Rule, in which the rancher receives a section 4 permit. This allows the rancher permission to place an improvement on the BLM while maintaining the ownership of that improvement.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Rama			1191	10	Subpart 4120 - Grazing Management	Flexibility is of the utmost importance elements in allotment management plans (AMP), implementation and overall land management. Rangelands are dynamic and continually changing based on such factors as drought, fire, invasive species and other. Flexibility allows for tweaking management as necessary to adjust to these changing conditions. With fixed and mandated permit conditions including AUMs, established on and off dates and other permit conditions, permittees are mostly prevented from adjusting to the conditions that occur over any given year on public lands. Ironically, flexibility is practiced as an ongoing function of private land management and should likewise be embraced by the BLM as a critical tool in land management. It is long overdue that BLM recognize the importance of flexibility and include it in Allotment Management Plans. Effective allotment monitoring provides the basis for changes to occur that require flexibility. Permittees cannot wait for time- consuming EAs to occur before adjusting management to embrace factors that require change.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Hank	Nevada State Grazing Board N2 District	NV	1471	12	Subpart 4120 - Grazing Management	Flexibility is also recognized as an essential element of Allotment Management Plans (AMPs) and both their implementation and overall land management. The Board maintains that rangelands are ever evolving and dynamic due to factors such as invasive species, drought, and fire. Flexibility allows management to adjust to these changing conditions in an effective, collaborative method. With the current fixed permit conditions such as strict AUMs, rigid on and off dates, and several other non-negotiable permit conditions, permittees are prohibited from adjusting accordingly to annual conditions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chandler	Britney			1160	1	Subpart 4120 - Grazing Management	First I feel that the BLM needs to be clear in acknowledging that the water right belongs to the stock owner and that has the beneficial use. With that said, it needs to be much easier to maintain and develop these stock waters. The development and maintenance of these waters benefits the wildlife as well as the livestock. Sometimes it takes years and unnecessary studies to proceed with developing and maintaining these waters.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kildew	Kim	Boulder Creek Ranch	ID	1483	5	Subpart 4120 - Grazing Management	Finally, the Idaho Supreme Court in a landmark decision recently determined that the water right "owner" is the party that actually puts the water to a "beneficial use". That is the livestock owner/user/ That utilization by livestock derives an economic value to the State of Idaho. The Court determined that the Lessor/BLM is not the actual user. Beneficial use as defined by the Idaho State Court has a economic component that wildlife and plants can utilize but cannot have a proprietary right to, ie ownership. Neither can the federal government as a lessor be the end user. A method of transferring these water right permits to the ranchers is the current subject of consideration by the Idaho Department of Water Resources and the State of Idaho. Water rights on BLM allotments should acknowledge the Lessee/Permittee as the entitled water right owner.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kildew	Kim	Boulder Creek Ranch	ID	1483	3	Subpart 4120 - Grazing Management	Each ranch and allotment has its own specific needs for operation and utilization. Rigid turnout times and rotations presented by the BLM grazing permits do not give the flexibility each permittee should have to best utilize their pasture requirements.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Terry	Otero County Cattleman's Association		1201	8	Subpart 4120 - Grazing Management	Currently the BLM is held to no science-based standard with respect to the information that the 'authorized officer' can use to make grazing decisions. Monitoring data is inconsistent and variable methods are used which doesn't allow for a reliable trend development. Trends are developed over time and are necessary for true ecological determinations and must be the basis for grazing decisions in the future. Long term measurable data in monitoring programs must be science-based for quality and quantity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Pauline	Otero County Cattleman's Association		1201	8	Subpart 4120 - Grazing Management	Currently the BLM is held to no science-based standard with respect to the information that the 'authorized officer' can use to make grazing decisions. Monitoring data is inconsistent and variable methods are used which doesn't allow for a reliable trend development. Trends are developed over time and are necessary for true ecological determinations and must be the basis for grazing decisions in the future. Long term measurable data in monitoring programs must be science-based for quality and quantity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	11	Subpart 4120 - Grazing Management	Currently the BLM is held to no science-based standard with respect to the information that the 'authorized officer' can use to make grazing decisions. Monitoring data is inconsistent and variable methods are used which doesn't allow for a reliable trend development. This inconsistent management is arbitrary and capricious and in violation of NEPA. Trends are developed over time and are necessary for true ecological determinations and must be the basis for grazing decisions in the future. Long term measurable data in monitoring programs must be science-based for quality and quantity.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stone	Gary	Otero County Cattleman's Association	NM	1201	8	Subpart 4120 - Grazing Management	Currently the BLM is held to no science-based standard with respect to the information that the 'authorized officer' can use to make grazing decisions. Monitoring data is inconsistent and variable methods are used which doesn't allow for a reliable trend development. Trends are developed over time and are necessary for true ecological determinations and must be the basis for grazing decisions in the future. Long term measurable data in monitoring programs must be science-based for quality and quantity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	13	Subpart 4120 - Grazing Management	Current regulations discourage permittees/lessees from privately funding permanent range improvements because of the constantly changing rules and regulations creating uncertainty in tenure or grazing as well as the permittee/lessee does not acquire title to said improvements. Section 4 of the TGA allows for permits or cooperative agreements to construct improvements on allotments. When the costs of a project are shared between the government and the pemittee/ lessee, a cooperative agreement may be appropriate and ownership is shared in proportion to the amounts contributed by either party. However, should a permittee/lessee prefer to construct improvements on their allotment at their own expense, they should not be forced to enter into a cooperative agreement nor strictly be limited to "removable range improvements'. Section 4 of the TGA does not refer to 'removable' range improvements.Private funding of installation and ownership of either permanent or removable improvements by Section 4 Permit must be reinstated. Section 4 affirms private ownership in that it states "No permit shall be issued which shall entitle the permittee to the use of such improvements constructed and owned by a prior occupant until the applicant has paid to such prior occupant the reasonable value of such improvements to be determined under rules and regulations of the Secretary of Interior". Section 402(g) of the Federal Land Policy Management Act (FLPMA) reaffirms that permittees/lessees shall receive reasonable compensation from the United States should their permit be canceled in whole or in part. This depicts ownership. Title to privately funded improvements must belong to the private interest. Also, approval of Section 4 Permits for privately funded improvement installations should be expedited in that it will not be necessary for the BLM to conduct a long drawn out process and/or coordinate with other entities or agencies. Encouraging private investment in rangelands is a win-win for both the BLM and property owners.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doverspike	Mark		OR	994	1	Subpart 4120 - Grazing Management	CONTROLLING NOXIOUS WEEDS as noted in 4120.5-2 needs more attention. Your supply of medussa head and other weed seed blows onto private property. Any private attempts to control weeds is futile when the source of seed comes from federal lands across the fence. Hence, it is important to treat the problem at its source!
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	26	Subpart 4120 - Grazing Management	Contrary to BLM's current regulation that water rights will be maintained under Idaho law and in the name of the United States only to the extent allowed by Idaho law, the BLM continues to hold thousands of water rights in its name in violation of the existing federal regulation, Idaho Code, the Idaho Constitution, and the decision of the Idaho Supreme Court in the Joyce Livestock case. The regulation at 43 C.F.R. § 4120.3-9 should be modified to state that BLM will abide by state law with respect to water rights and will also abide by the decision of state courts, who have jurisdiction over state water law, both retroactively and prospectively. The BLM should work with the Idaho Department of Water Resources to ensure an orderly transfer of all stockwater rights held by BLM to their rightful owners to rectify these illegitimate claims.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keck	John E.			1482		Subpart 4120 - Grazing Management	Continuing, Specific requests for 4120.3 Range Improvements are as follows (where references are not included from the contents of said regulations, no changes are requested. Only changes are so noted in red or defined as delete): 4120.3 Range Improvements. 4120.3-1 Conditions for Range improvements (b) Prior to installing, using, maintaining, and/or modifying range improvements on the federal lands, permittees or lessees shall have an approved notice to proceed. (f) Proposed range improvement projects may be reviewed in accordance with the requirements of the National Environmental Policy Act (42 U.S.C. 4371 et. seq.) or may be reviewed pursuant to a categorical exclusion. Delete current 4120.3-2 (a)-(d) in its entirety and insert 4120.3-2 Range improvement permits. (a) Any permittee or lessee may apply for a range improvement permit to install, use, maintain, and/or modify range improvements that are needed to achieve management objectives for the allotment in which the permit or lease is held. The permittee or lessee shall agree to provide full funding for construction, installations, modification, or maintenance. (b) Permittee(s) or lessee(s) own the projects authorized by Section 4 permits. 4120.3-3 Cooperative range improvement agreements (a) The cooperative range improvement agreement shall specify how the costs or labor, or both, shall be divided between the United States and cooperator(s). (b) Title to the improvements shall be shared with the United States and cooperator(s) in proportion to the actual amount of the respective contribution to the initial construction. (c) Range improvement work performed by a cooperator or permittee on federal lands or land administered by the BLM does not confer a right of title to the agency or land affected the range improvement work. 4120.3-6 Removal and compensation for loss of range improvements. Delete all of current (b) and change current (c) to (b). 4120.3-8 Range Improvement Fund (c) During the planning of the range development or range improvement programs, the authorized officer shall consult the resource advisory council, affected permittees, and members of the affected interests
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Hank	Nevada State Grazing Board N2 District	NV	1471		Subpart 4120 - Grazing Management	Both the current best available science and the Board suggest that the current S&Gs for rangeland health in Nevada are too general to accurately measure or assess the condition of public lands. Through this regulatory update, the Board would support the removal of 43 CFR 4180 and the resulting rangeland health S&Gs in an effort to improve positive, effective management decisions. Currently, the application of this regulation does not improve any grazing practices or natural resource management in general. As a replacement for this regulation and the S&Gs, the Board suggests that the BLM administers guidelines for management on an allotment by allotment basis. Specifically, the Board asks that these suggested guidelines be based on realistic resource objectives, on-site potential, and focus on active collaboration and involvement with the affected permittees. Similar to comments found above, the Board maintains that achieving resource allotment objectives would be more realistic if they are based on cooperative development of AMPs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387		Subpart 4120 - Grazing Management	At 4120.3-2 Cooperative range improvements: The WSGB comments that the current language at (a) be replaced with the language removed on 2/22/95. The WSGB comments that permittees should be allowed to construct certain range improvements with non-federal funds and, receive for those projects, a so called, Section 4 permit for these projects. Section 3 permittees should be allowed to own these projects according to the amount of non-BLM funds spent by these permittees on the project.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burns	Nick			1156	1	Subpart 4120 - Grazing Management	Any changes to western grazing policies must include: Limit grazing to 30% of vegetation Limit grazing to protect all cultural resources, including historical sites, archeological sites, native springs, etc. Promote native vegetation (NOT European grasses).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Whicker	Keven	Beaver County	UT	754	3	Subpart 4120 - Grazing Management	Allotment management plans need to evolve as ground conditions change. Fire and other factors can completely alter the ecosystem and need to be reflected in how an allotment is utilized. Certainly, we want to manage for a desired condition, but unless and until that condition is reached, the grazing practices in use should reflect what is most appropriate for the range currently.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	4	Subpart 4120 - Grazing Management	All forages, browse and forbs including invasive annuals should be considered for management. The abundance of cheat grass and other invasive species covering many areas of the Great Basin need to be managed by appropriate livestock grazing practices due to its long standing existence and perpetuity. Temporary Non-Renewable (TNR) or new better management equivalent, should be granted in a timely manner, as needed, to control such forages. Management of annual forage must be considered of equal importance to perennial forages when making a grazing plan. There are numerous studies documenting that proper grazing with livestock can be used to facilitate the resistance to the invasion of annual grasses as well as aid the recovery of rangelands. Livestock grazing is the only cost effective tool to effectively manage invasive annual grasses on a landscape scale. Decisions to manage specific forages during certain seasons must be made quickly in order not to pass the optimal grazing opportunities. Those decisions should be made on a local level without NEPA requirements.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carter	Jacob	Carter Cattle Co.	NV	954	4	Subpart 4120 - Grazing Management	All forage and browse including annuals and forbs should be considered for management. Timely grasses of annuals can enhance and promote perennials where annuals have become abundant and dominant. Grazing plans should include the timely control of invasive plants. Annual grassses are here to stay and the proper managment of them can help control range fires and give abundant feed to livestock that otherwise would not exist.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	18	Subpart 4120 - Grazing Management	Additionally, administration of state water rights is the responsibility of the State where the water right is appurtenant. The federal government lacks authority to administer water rights. The State of Idaho suggests that the word "administered" should be deleted from the authorities of the United States in 43 CFR § 4120.3-9.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488		Subpart 4120 - Grazing Management 9	A cooperative monitoring system between the 001 and permittees should be developed. Permittees and field offices should collaborate on an annual basis to create a monitoring plan for each permit. The best and most efficient monitoring practices should be used. Documentation through transect lines, photos and other practices should be collaborated annually to ensure proper management. Permittee and 001 annual photo point monitoring should be a 001 acceptable data collection tool used for annual utilization monitoring. Photo points would be collaboratively established by the 001 and Permittee. This effort must involve all users including, wildlife agencies and wild horse and burro monitoring. Permittees should be allowed to participate in monitoring efforts in conjunction with the BLM or Forest Service to allow for transparency.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332		Subpart 4120 - Grazing Management 13	6. "Conservation Use" should be removed from the regulations. Properly managed adaptive grazing (which included periods of rest from grazing) on the landscape is conservation use
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834		Subpart 4120 - Grazing Management 17	43 CFR § 4120.3-9 does not resolve the water right ownership issue for water rights already held by the United States in contradiction to State law. The State suggests the BLM considers adding the following language to the section to resolve this issue: If the United States holds a water right authorizing watering of livestock on public land that was perfected contrary to the law of the State where livestock are watering, the United States shall forfeit ownership and interest in such water right so that it may be administered in accordance with State law.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125		Subpart 4120 - Grazing Management 13	43 C.F.R. § 4120.3-1(f) Range Improvements Range improvement projects are a useful way for BLM and permittees to incorporate tools to effectively manage the range and distribute livestock use. Once an allotment management plan is approved, range improvement projects that are implementing that plan should not be considered new decisions and should not be subject to administrative appeals or require further NEPA analysis. We recommend the following language change: "(f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion. The range improvements are not decisions subject to protest or appeal under Section 4160.2."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802		Subpart 4120 - Grazing Management 28	4120.5-2 Cooperation with State, county and federal agencies - Paragraph (b) must be strengthened to ensure that noxious weed control will be taken much more seriously by BLM personnel. Farm Bureau members complain that federal agencies do not cooperate on noxious weed issues, and when pressed, use budget constraints as excuses for not being more pro-active. Noxious weed control projects should be allowed under a CAT EX since ignoring the problem only makes it much worse. BLM must allocate adequate resources to address this growing problem, particularly on lands adjacent to private property so as not to constantly infest private lands with noxious weeds. Idaho law requires landowners to control noxious weeds at the landowner's expense. BLM regulations should require BLM to follow state law with respect to noxious weed control, particularly on lands adjacent to other landowners.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	27	Subpart 4120 - Grazing Management	4120.4 special rules - There should only be authority to propose special rules to make grazing administration more flexible and results oriented, not to restrict or otherwise impair grazing. There are specific rights of livestock grazers that must be protected as recognized by TGA and FLPMA. Rules to provide for additional opportunities and flexibilities for permittees are welcomed, while special rules to restrict opportunities or diminish rights will always be met with skepticism and must be subject to valid existing rights.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	33	Subpart 4120 - Grazing Management	4120.3-9 Water rights for the purpose of livestock on public lands: The WSGB recommends a return to pre-RR reform 94 Regulation language that says that BLM will follow State Law with respect to water on Federal BLM lands, but NOT try to acquire water in JUST THEIR NAME ALONE for livestock water projects.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	25	Subpart 4120 - Grazing Management	4120.3-9 Water Rights for the purpose of livestock grazing on Public lands - In Idaho, state water law clearly requires that stockwater rights may only be held by the person owning or controlling the stock that is using the waters, including those on public lands. See Idaho Code, Title 42, Chapter 5 and Joyce Livestock Company v. United States, 144 Idaho 1 (2007). BLM regulations must allow for the full and complete use of these privately held stockwater rights on federally administered rangelands by removing any restrictions on permittees installing pipelines, troughs, tanks and other water system components which will provide for better livestock distribution across the range, but also provides additional water sources for wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Rosemary			1194	5	Subpart 4120 - Grazing Management	4120.3-9 In New Mexico, water rights can only be owned by whoever puts the water to beneficial use. The United States cannot do this; only the allotment holder can do this. Therefore, this section is not legal in New Mexico.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Zion	Candi		MT	35	3	Subpart 4120 - Grazing Management	4120.3-6 Organizations/ranches have requested the removal of fences. I disagree that fences in excellent to fair condtion should be removed as they are an asset with a large cost associated in their construction. Additionally, who owns the asset- especially when the permit changes? The new permit holder or the BLM? Fences are extremely expensive to build. If the organization/ranch that requests the removal of fences loses their permit, then what? The next permittee must rebuild fences again? It is a waste of money and time. Please add more language regarding the ownership of fences and the removal of fences with a consideration to cost and needs of future permittees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Thille	Rod		NM	1394	1	Subpart 4120 - Grazing Management	4120.3-3 (c) 1, 2, and 3 be deleted from the regulations. Authorizing grazing by another person without the permission of the ranch owner is confiscation of private property.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Waite	Anita M.	Big Sandy NRDC	AZ	1437	6	Subpart 4120 - Grazing Management	4120.3-2 Cooperative range improvement agreements. (b) Subject to valid existing rights title to permanent range improvements such as fences, wells, and pipe lines where authorization is granted after August 21, 1995 shall be in the name of the United States. The authorization for all new permanent water developments such as spring developments, wells, reservoirs, stock tanks, and pipelines shall be through cooperative range improvement agreements. The above statement should be eliminated and not a part of the regulations. (c) Range improvement work (The whole paragraph should be removed)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	23	Subpart 4120 - Grazing Management	4120.3-2 Cooperative Range Improvement Agreements - Paragraph b should be substantially modified. The new regulations should explicitly state that the lessee or permittee may hold title to range improvements, both structural and nonstructural, in proportion to the permittee's or lessee's contribution of costs or labor or both.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Rosemary			1194	4	Subpart 4120 - Grazing Management	4120.3 Range Improvements The process of approval has been adequate. What has not been satisfactory is the process of clearance by the archeologist. BLM claims that the agency does not have many archeologists this step of obtaining clearance should not hinder progress on the project.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miyamoto	Doug	Wyoming Department of Agriculture	WY	910	4	Subpart 4120 - Grazing Management	4120.2 Allotment Management Plans. -Allotment Management Plans (AMPs) are often outdated and do not reflect change In conditions or current management. We request BLM revise the AMP process to not prohibit flexibility as found in 4120.2(a)(3) ·Specclfy the limits 0/ flexibility, to be determined and granted_· but rather develop a wide array of options to guide livestock management to meet desired resource conditions. We also believe NEPA should only analyze the permit, not the AMP. The BLM prohibits themselves and the grazing permittees from making changes to livestock grazing management on an annual basis due to the limited flexibility and Record Decision. Ultimately this lack of flexibility hinders the grazing permittees from making progress towards rangeland health standards.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	20	Subpart 4120 - Grazing Management	4120.2 Allotment management plans - IFBF recommends that BLM strike interested public from the list of those who may develop allotment management plans, unless they have some specific expertise in range management, or similar field of science. AMPs are not political nor collaborative decision documents, they are management plans used to guide permittees as they utilize forage on federally administered ranges to ensure that rangeland health criteria are met. AMPs should contain significant flexibility as to season of use (on and off dates) and number of AUMs. Every rancher knows that each year is different. Precipitation, temperature and other natural factors combine to ensure that the amount of forage is different from one year to the next, as well as the date the forage is ready for grazing. It has been readily acknowledged by most thoughtful observers that rigid on/off dates have been counter-productive in achieving the desired results of improving rangeland health. BLM Range Conservation Officers, in conjunction with Permittees, must collaboratively determine the appropriate management plan each year depending on current conditions. AMPs must contain the flexibility needed to allow for these decisions that will benefit both the range and the permittees.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	22	Subpart 4120 - Grazing Management	11) BLM must require livestock grazing management practices to maintain and improve wilderness characteristics and other special values of grazed lands
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Waite	Anita M.	Big Sandy NRDC	AZ	1437	5	Subpart 4120 - Grazing Management	§4120.3-1 Conditions for range improvements. (b) Prior to installing, using, maintaining, and/or modifying range improvements on the public lands, permittees or lessees shall have entered into a cooperative range improvement agreement with the Bureau of Land Management or must have an approve range improvement permit. Should read: "Prior to installing, using maintaining, and/or modifying range improvements on the federal lands, permittees or lessees shall have an approve range improvement permit with the Bureau of Land Management."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Meeks	Shari	Sublette County Conservation District	WY	1353	3	Subpart 4120 - Grazing Management	§4120.2 Allotment management plans and resource activity plans. (4) Currently states "Provide for monitoring to evaluate the effectiveness of management actions in achieving the specific resource objectives of the plan." SCCD suggests this section additionally describe the criteria for a monitoring plan that will be used for making management adjustments. Monitoring plans with clear objectives can greatly assist land managers with making defensible decisions when needed as it relates to adaptive management, outcome-based grazing, or in response to catastrophic events. SCCD offers the following to be added: "Grazing management should be based on clearly stated objectives and on a plan for obtaining both qualitative and quantitative data to document whether those objectives are being met. The minimum requirements for a comprehensive monitoring plan include: 1) Management objectives relevant to monitoring data by monitoring site location; 2) What should be measured and the method or protocol to be used; 3) Where should the data be collected; 4) What season of year the data will be collected; 5) How often the data will be collected and for how long; 6) Qualifications of observers and those who will interpret the results; and 7) How the data will be interpreted."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	ortega	adam	Colorado Department of Agriculture	CO	981	8	Subpart 4120 - Grazing Management	§ 4120.2 Allotment management plans and resource activity plans. Overall, allotment management plans are a tool that was designed to outline long-term management objectives and incorporate grazing to achieve the identified objectives. CDA encourages BLM to continue to use allotment management plans and require that they be developed in coordination with permittees and the state or states having lands or responsibility for managing resources within the area to be covered by such a plan. Adaptable management plans would allow for adjustments as fluctuations in climatic conditions and other resource concerns that may need to be addressed on a shorter term than the 10 year permit renewal. Specific grazing rotations may need adjustment multiple times within the term of a permit. The inability to make these adjustments creates scenarios where livestock operators are bound to the practices identified in the permit resulting in potential negative impacts to the resources of concern.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	49	Subpart 4120 - Grazing Management	§ 4120.2 Allotment management plans and resource activity plans. OLD TEXT Allotment management plans or other activity plans intended to serve as the functional equivalent of allotment management plans may be developed by permittees or lessees, other Federal or State resource management agencies, interested citizens, and the Bureau of Land Management. When such plans affecting the administration of grazing allotments are developed, the following provisions apply: NEW TEXT Allotment management plans or other activity plans intended to serve as the functional equivalent of allotment management plans may be developed by permittees or lessees, other Federal or State resource management agencies, interested PUBLIC, and the Bureau of Land Management. When such plans affecting the administration of grazing allotments are developed, the following provisions apply: RATIONALE See insertions and deletions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	54	Subpart 4120 - Grazing Management	(a) Range improvements shall be installed, used, maintained, and/or modified on the public lands, or removed from these lands, in a manner consistent with multiple-use management. Original text: (b) Prior to installing, using, maintaining, and/or modifying range improvements on the public lands, permittees or lessees shall have entered into a cooperative range improvement agreement with the Bureau of Land Management or must have an approved range improvement permit. Proposed text: (b) Prior to installing, using, maintaining, and/or modifying range improvements on the public lands, permittees or lessees shall have an approved range improvement permit or have entered into a cooperative range improvement agreement with the Bureau of Land Management or must have an approved range improvement permit. Original text: (c) The authorized officer may require a permittee or lessee to maintain and/or modify range improvements on the public lands under §4130.3-2 of this title. Bureau of Land Management, Interior Proposed text: (c) The authorized officer may require a permittee or lessee to maintain and/or modify range improvements on the public lands under §4130.3-2 of this title. Original text: (d) The authorized officer may require a permittee or lessee to install range improvements on the public lands in an allotment with two or more permittees or lessees and/or to meet the terms and conditions of agreement. (e) A range improvement permit or cooperative range improvement agreement does not convey to the permittee or cooperator any right, title, or interest in any lands or resources held by the United States. Original text: (f) Proposed range improvement projects with the requirements of the National Environmental Policy Act of 1989 (42 U.S.C. 4371 et. seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. Proposed text: (f) Proposed range improvement projects may be reviewed in accordance with the requirements of the National Environmental Policy Act of 1989 (42 U.S.C. 4371 et. seq.). Issuance of Range Improvement Permits and Cooperative Agreements for range improvements may be reviewed pursuant to a categorical exclusion. Original text: [49 FR 6152, Feb. 21, 1984] 4120.3 2 Cooperative range improvement agreements. (a) The BLM may enter into a cooperative range improvement agreement with any person, organization, or other government entity for the installation, use maintenance, and/or modification or range improvements or rangeland developments to achieve management or resource condition objectives. The cooperative range improvement agreement shall specify how the costs or labor, or both shall be divided between the US and cooperators(s). (b) Subject to valid existing rights, title to permanent range improvements such as fences, wells, and pipelines where
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rodriguez	Dan	Mohave County Farm and Livestock Bureau	AZ	1489	2	Subpart 4120 - Grazing Management	"Range Improvements" Range improvements should not be mandatory cooperative agreements. The only time a cooperative agreement should exist is if the BLM finances the project otherwise it should be a permit to place the improvement as it was prior to 'Rangeland 94'

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	21	Subpart 4120 - Grazing Management	We support an Instruction Memo to all field offices to assess if rangeland management tools other than reductions in active AUMs will accomplish allotment objectives. BLM should document when other factors, such as fire, roads, wild horses, drought, or invasive species impact rangeland conditions. Changes to BLM management should address the cause of problems, not simply reduce livestock grazing. When grazing plays a role in problems, it is important to use appropriate management, not just reduce AUMs. Grazing Permit Renewals. The grazing permit renewal process has become unworkable. The process is too expensive, slow, and complicated. Grazing permits should be considered as continuation of an ongoing process. Unless changes are being made to the permit, they should be renewed as a categorical exclusion. Regulatory language regarding range improvements should be changed to: OLD TEXT: "§ 4120.3-1(f) Conditions for range improvements. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. COMMENTER'S RECOMMENDED NEW TEXT: "§ 4120.3-1(f) Conditions for range improvements. Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ruyle	George	University of Arizona	AZ	913	4	Subpart 4120 - Grazing Management	Revise section 4120.2(a)(4) to describe the criteria for a monitoring plan that will be used for making management adjustments. Grazing management should be based on clearly stated objectives and on a plan for obtaining data to document whether those objectives are being met. The requirements for a monitoring plan should include: Management objectives relevant to monitoring data What should be measured and the method or protocol to be used. Where should the data be collected What season of the year data will be collected. How often the data will be collected and for how long, Qualifications of observers and those who will interpret the results How the data will be interpreted
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	37	Subpart 4120 - Grazing Management	OLD TEXT Range improvement permits and co-operative range improvement agree-ments shall specify the standards, de-sign, construction and maintenance criteria for the range improvements and other additional conditions and stipulations or modifications deemed necessary by the authorized officer. NEW TEXT Range improvement permits and cooperative range improvement agreements shall may specify the standards, design, construction and maintenance criteria for the range improvements and other additional conditions and stipulations or modifications deemed necessary by the authorized officer after consultation and coordination with the permittee or lessee.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	53	Subpart 4120 - Grazing Management	OLD TEXT § 4120.3-3 Range improvement permits. (a) Any permittee or lessee may apply for a range improvement permit to install, use, maintain, and/or modify removable range improvements that are needed to achieve management objectives for the allotment in which the permit or lease is held. The permittee or lessee shall agree to provide full funding for construction, installation, modification, or maintenance. Such range improvement permits are issued at the discretion of the authorized officer. (b) The permittee or lessee may hold the title to authorized removable range improvements used as livestock handling facilities such as corrals, creep feeders, and loading chutes, and to temporary structural improvements such as troughs for hauled water. (c) Where a permittee or lessee cannot make use of the forage available for livestock and an application for temporary nonuse or conservation use has been denied or the opportunity to make use of the available forage is requested by the authorized officer, the permittee or lessee shall cooperate with the temporary authorized use of forage by another operator, when it is authorized by the authorized officer following consultation with the preference permittee(s) or lessee(s). NEW TEXT § 4120.3-3 Range improvement permits. (a) Any permittee or lessee may apply for a range improvement permit to install, use, maintain, and/or modify ____ range improvements that are needed to achieve APPLICABLE objectives IN THE LAND USE PLAN for the allotment in which the permit or lease is held. The permittee or lessee shall agree to provide full funding for construction, installation, modification, or maintenance. _____. (b) The permittee or lessee SHALL hold the title to THE range improvements AUTHORIZED UNDER RANGE IMPROVEMENT PERMITS. (c) Where a permittee or lessee cannot make use of the ACTIVE USE available for livestock ON AN ALLOTMENT and an application for temporary nonuse ____ has been denied or the opportunity to make use of the ACTIVE USE available FOR LIVESTOCK is requested by the authorized officer, the permittee or lessee shall cooperate with the temporary authorized use of HIS/HER ACTIVE USE FOR LIVESTOCK by another QUALIFIED APPLICANT when it is authorized by the authorized officer following consultation with the preference permittee(s) or lessee(s). RATIONALE See insertions and deletions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	51	Subpart 4120 - Grazing Management	OLD TEXT (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. NEW TEXT (f) Proposed range improvement projects MAY be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. RATIONALE Comment [AS26]: The word "may" should be used, as opposed to "shall", because it is likely that ALL "[p]reposed range improvement projects" will not require review under NEPA. It is likely, for example, that a DNA (Determination of NEPA Adequacy) or a CX(Categorical Exclusion) could provide sufficient "NEPA" coverage for a proposed range improvement. Alternatively, it is likely that CEQ could promulgate rules or Congress could amend NEPA to refine the scope of any necessary NEPA compliance.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	32	Subpart 4120 - Grazing Management	OLD TEXT (e) Allotment management plans or other applicable activity plans intended to serve as the functional equivalent of allotment management plans may be revised or terminated by the authorized officer after consultation, cooperation, and coordination with the affected permittees or lessees, landowners involved, the resource advisory council, any State having lands or responsible for managing resources within the area to be covered by the plan, and the interested public. NEW TEXT (e) Allotment management plans or other applicable activity plans intended to serve as the functional equivalent of allotment management plans may be revised or terminated by the authorized officer after consultation, cooperation, and coordination with the affected permittees or lessees, landowners involved, the resource advisory council, any State having lands or responsible for managing resources within the area to be covered by the plan
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	36	Subpart 4120 - Grazing Management	OLD TEXT (c) Where a permittee or lessee cannot make use of the forage available for livestock and an application for temporary nonuse or conservation use has been denied or the opportunity to make use of the available forage is requested by the authorized officer, the permittee or lessee shall cooperate with the temporary authorized use of forage by another operator, when it is authorized by the authorized officer following consultation with the preference permittee(s) or lessee(s). NEW TEXT (c) Where a permittee or lessee cannot make use of the forage available for livestock and an application for temporary nonuse or the opportunity to make use of the available forage is requested by the authorized officer, the permittee or lessee shall cooperate with the temporary authorized use of forage by another operator, when it is authorized by the authorized officer following consultation with the preference permittee(s) or lessee(s).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	54	Subpart 4120 - Grazing Management	<p>OLD TEXT (b) The authorized officer may require permittees or lessees to remove range improvements which they own on the public lands if these improvements are no longer helping to achieve land use plan or allotment goals and objectives or if they fail to meet the criteria under § 4120.3-4 of this title. (c) Whenever a grazing permit or lease is cancelled in order to devote the public lands covered by the permit or lease to another public purpose, including disposal, the permittee or lessee shall receive from the United States reasonable compensation for the adjusted value of their interest in authorized permanent improvements placed or constructed by the permittee or lessee on the public lands covered by the cancelled permit or lease. The adjusted value is to be determined by the authorized officer. Compensation shall not exceed the fair market value of the terminated portion of the permittee's or lessee's interest therein. Where a range improvement is authorized by a range improvement permit, the livestock operator may elect to salvage materials and perform rehabilitation measures rather than be compensated for the adjusted value. NEW TEXT (b) The authorized officer may require permittees or lessees to remove range improvements which they own on the public lands if these improvements are no longer helping to achieve APPLICABLE land use plan or ACTIVE PLAN objectives or if they fail to meet the criteria under § 4120.3-4 of this title. (c) Whenever a grazing permit or lease is cancelled in order to devote the public lands covered by the permit or lease to another public purpose, including disposal, the permittee or lessee shall receive from the United States reasonable compensation for the adjusted value of their interest in authorized _____ improvements placed or constructed by the permittee or lessee on the public lands covered by the cancelled permit or lease. The adjusted value is to be determined by the authorized officer. Compensation shall not exceed the fair market value of the terminated portion of the permittee's or lessee's interest therein. Where a range improvement is authorized by a range improvement permit, the livestock operator may elect to salvage materials and perform rehabilitation measures rather than be compensated for the adjusted value. RATIONALE See insertions and deletions</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	52	Subpart 4120 - Grazing Management	<p>OLD TEXT (b) Subject to valid existing rights, title to permanent range improvements such as fences, wells, and pipelines where authorization is granted after August 21, 1995 shall be in the name of the United States. The authorization for all new permanent water developments such as spring developments, wells, reservoirs, stock tanks, and pipelines shall be through cooperative range improvement agreements. A permittee's or lessee's interest in contributed funds, labor, and materials will be documented by the Bureau of Land Management to ensure proper credit for the purposes of §§ 4120.3-5 and 4120.3-6(c). (c) The United States shall have title to nonstructural range improvements such as seeding, spraying, and chaining. NEW TEXT (b) The cooperative range improvement agreement shall specify how the costs or labor, or both, shall be divided between the United States and cooperator(s). (c) Title to improvements shall be shared by the United States and cooperator(s) in proportion to the actual amount of the respective contribution to the initial construction. RATIONALE Comment [AS27]: The rules must be clarified to reaffirm the ability of thermite or lessee to invest their own capital, via range improvement permits, to improve the public lands, particularly given declining USDIBLM budgets. See also43 C.F.R. 4120.33(a), (b).</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	34	Subpart 4120 - Grazing Management	OLD TEXT (b) Subject to valid existing rights, title to permanent range improve-ments such as fences, wells, and pipe-lines where authorization is granted after August 21, 1995 shall be in the name of the United States. The author-ization for all new permanent water de-velopments such as spring develop-ments, wells, reservoirs, stock tanks, and pipelines shall be through coopera-tive range improvement agreements. A permittee's or lessee's interest in con-tributed funds, labor, and materials will be documented by the Bureau of Land Management to ensure proper credit for the purposes of §§ 4120.3-5 and 4120.3-6(c). NEW TEXT (b) Subject to valid existing rights, title to permanent range improvements such as fences, wells, and pipelines shall be in the name of the name permittee's or lessee's according to their contributed funds, labor, and materials. . The authorization for all new permanent water developments such as spring developments, wells, reservoirs, stock tanks, and pipelines shall be through cooperative range improvement agreements. A permittee's or lessee's interest in contributed funds, labor, and materials will be documented by the Bureau of Land Management to ensure proper credit for the purposes of §§ 4120.3-5 and 4120.3-6(c). RATIONALE Not receiving title to contributions by the permittee is a disincentive for the permittee to invest in management of the allotment and may have a negative effect on improving the rangelands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	56	Subpart 4120 - Grazing Management	OLD TEXT (b) Funds appropriated for range improvements are to be used for investment in all forms of improvements that benefit rangeland resources including riparian area rehabilitation, improvement and protection, fish and wildlife habitat improvement or protection, soil and water resource improvement, wild horse and burro habitat management facilities, vegetation improvement and management, and livestock grazing management. The funds may be used for activities associated with underground improvements including the planning, design, layout, contracting, modification, maintenance for with the Bureau of Land Management is responsible, and monitoring and evaluating the effectiveness of specific range improvement projects. NEW TEXT (b) Funds appropriated for range improvements are to be used for investment in all forms of improvements that benefit rangeland resources including riparian area rehabilitation, improvement and protection, fish and wildlife habitat improvement or protection, soil and water resource improvement, vegetation improvement and management, and livestock grazing management. The funds may NOT be used for activities associated with underground improvements including the planning, design, layout, contracting, _____ for with the Bureau of Land Management is responsible, and monitoring and evaluating the effectiveness of specific range improvement projects. RATIONALE Comment [AS29]: The rule should be modified to remove the expenditure of "range "funds on wild horse and burro facilities, which should be based upon "wild horse and burro" funds. Comment [AS30]: The rule should be modified to remove the ability of BLM to consume "range" funds simply based upon in the in-house office activities. The "range "funds should be allocated and used for on the ground activities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Ade	Kane County Commissioners	UT	1141	17	Subpart 4120 - Grazing Management	Kane County suggest that the BLM grant permittees shared title to range improvements in which they helped fund or build in proportion to their contribution. Mirroring pre 1995 regulation, this revision would provide permittees the ability to be fairly compensated for their investment or be able to transfer that ownership if sold

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallidge	Samuel		NM	1319	10	Subpart 4120 - Grazing Management	§ 4120.3-8 Range improvement fund. OLD TEXT (a) In addition to range developments accomplished through other resource management funds, authorized range improvements may be secured through the use of the appropriated range improvement fund. One-half of the available funds shall be expended in the State and district from which they were derived. The remaining one-half of the fund shall be allocated, on a priority basis, by the Secretary for on-the-ground and rehabilitation, protection and improvement of public rangeland ecosystems. NEW TEXT (a) In addition to range developments accomplished through other resource management funds, authorized range improvements may be secured through the use of the appropriated range improvement fund. One-half of the available funds shall be expended in the State and district from which they were derived. The remaining one-half of the fund shall be allocated, on a priority basis, by the Secretary for on-the-ground livestock grazing management improvements, and rehabilitation, protection and improvement of public rangeland ecosystems. OLD TEXT (b) Funds appropriated for range improvements are to be used for investment in all forms of improvements that benefit and rangeland resources including riparian area rehabilitation, improvement and protection, fish and wildlife habitat improvement or protection, wild horse and burro habitat management facilities, and livestock grazing management. The funds may be used for activities associated with on-the-ground improvements including the planning, design, layout, contracting, modification, maintenance for which the Bureau of Land Management is responsible, and monitoring and evaluating the effectiveness of specific range improvement projects. NEW TEXT (b) Funds appropriated for range improvements are to be used for investment in all forms of improvements that benefit livestock grazing management and rangeland ecosystems including soil and water resource improvement and vegetation improvement and management. Funds shall be used for activities associated with on-the-ground improvements including the planning, design, layout, contracting, modification, maintenance for which the Bureau of Land Management is responsible, and monitoring and evaluating the effectiveness of specific range improvement projects.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	Tony		ID	1088	8	Subpart 4120 - Grazing Management	Range Improvements During the scope of CGA’s permit renewal process we submitted certain range improvements to be analyzed to better utilize the resource and distribute livestock. Due to the cumbersome, complicated process of permit renewals, and the BLM’s inability to analyze said improvements under the backlog and budget cuts, range improvements were not considered and this is not only unfair, but does not allow best practices in management plans. Therefore, we recommend that the regulations be modified to allow range improvements under allotment management plans, and that said improvement projects that are consistent with the AMP be documented with a categorical exclusion from NEPA. Furthermore, said range improvements would not be decisions that could be subject to protest or appeal.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlson	James	Montana Natural Resource Coalition		1342	19	Subpart 4120 - Grazing Management	Issue: Statutory preference for those engaged in the livestock business; base and commensurate grazing lands. Explanation: The TGA grazing district system requires the Secretary to give preference and safeguard grazing privileges to those engaged in the livestock industry. Criteria: NEPA/CEQ: 42 USC § 4335 Efforts supplemental to existing authorizations - "The policies and goals set forth in this Act are supplementary to those set forth in existing authorizations of Federal agencies." 43 CFR Part 4100: 43 CFR §4100.0-5 Definitions (Base property), (Grazing lease), (Grazing permit), (Grazing preference, or preference) - 43 CFR § 4110 Qualifications and Preference - 43 CFR § 4110.0-1 Mandatory qualifications - 43 CFR § 4110.2-1 Base Property - 43 CFR § 4110.2-3 Transfer of grazing preference - TGA: 43 USC § 315b Grazing permits- "The Secretary of Interior is authorized to issue ... permits to graze livestock on such grazing districts to such bona fide settlers, residents, and other stock owners ... Preference shall be given in the issuance of grazing permits to those within or near a district who are landowners engaged in the livestock business, bona fide occupants or settlers, or owners of water or water rights, as may be necessary to permit the proper use of the lands ..." PRIA: 43 USC § 1904 - "... (c) ... To the maximum extent practicable, and where economically sound, the Secretary shall give priority to entering into cooperative agreements with range users ... for the installation and maintenance of on-the- ground range improvements." FLMPA: 43 USC § 1702 Definitions - "... (k) An "allotment management plan" means a document prepared in consultation with the lessees or permittees involved, which applies to livestock operations on the public lands or on lands within National Forests in the eleven contiguous Western States ..." 43 USC § 1702 Definitions - "... (p) The term "grazing permit and lease" means any document authorizing use of public lands or lands within the National Forests ... for the purpose of grazing domestic livestock."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	60	Subpart 4120 - Grazing Management	OLD TEXT Any right acquired on or after Au-gust 21, 1995 to use water on public land for the purpose of livestock watering on public land shall be acquired, per-fected, maintained and administered under the substantive and procedural laws of the State within which such land is located. To the extent allowed by the law of the State within which the land is located, any such water right shall be acquired, perfected, maintained, and administered in the name of the United States. NEW TEXT Any right acquired on or after August 21, 1995 to use water on public land for the purpose of livestock watering on public land shall be acquired, perfected, maintained and administered under the substantive and procedural laws on the State within such land is located.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	53	Subpart 4120 - Grazing Management	OLD TEXT § 4120.3 Range improvements. § 4120.3-1 Conditions for range improvements. (a) Range improvements shall be in-stalled, used, maintained, and/or modi-fied on the public lands, or removed from these lands, in a manner con-sistent with multiple-use management. (b) Prior to installing, using, main-taining, and/or modifying range im-provements on the public lands, per-mittees or lessees shall have entered into a cooperative range improvement agreement with the Bureau of Land Management or must have an approved range improvement permit. (c) The authorized officer may re-quire a permittee or lessee to maintain and/or modify range improvements on the public lands under § 4130.3-2 of this title. (d) The authorized officer may re-quire a permittee or lessee to install range improvements on the public lands in an allotment with two or more permittees or lessees and/or to meet the terms and conditions of agreement. (e) A range improvement permit or cooperative range improvement agree-ment does not convey to the permittee or cooperator any right, title, or inter-est in any lands or resources held by the United States. (f) Proposed range improvement projects shall be reviewed in accord-ance with the requirements of the Na-tional Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the pro-posed decision under subpart 4160 of this part. [49 FR 6452, Feb. 21, 1984, as amended at 60 FR 9964, Feb. 22, 1995; 61 FR 4227, Feb. 5, 1996] NEW TEXT §4120.3-2 Range improvement permits. (a) Any permittee or lessee may apply for a range improvement permit to install, use, maintain, and/or modify range improvements that are needed to achieve management objectives for the allotment in which the permit or lease is held. The permittee or lessee shall agree to provide full funding for construction, installation, modification, or maintenance. (b) Permittee(s) or lessee(s) own the projects authorized by Section 4 permits. (c) A permittee or lessee shall be reasonable compensated for use and maintenance of improvements and facilities by the operator who has an authorization for temporary grazing use. (c) The authorized officer may mediate disputes ab out reasonable compensation and, following consultation with the parties involved, make a determination concerning the fair and reasonable expenses and compensation for use of the authorized improvements and facilities. Where a settlement cannot be reached, the authorized office shall issue a temporary grazing authorization including appropriate terms and conditions and the requirement to compensate the preference permittee or lessee for the fair share of operation as determined by the authorized officer under subpart 4160 of this part.§4120.3-3 Cooperative range improvement agreements. (d) The BLM may enter into a cooperative range improvement agreement with

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	49	Subpart 4120 - Grazing Management	OLD TEXT § 4120.2 Allotment management plansand resource activity plans. Allotment management plans or other activity plans intended to serve as the functional equivalent of allot-ment management plans may be devel-oped by permittees or lessees, other Federal or State resource management agencies, interested citizens, and the Bureau of Land Management. When such plans affecting the administration of grazing allotments are developed, the following provisions apply: (a) An allotment management plan or other activity plans intended to serve as the functional equivalent of allotment management plans shall be prepared in careful and considered con-sultation, cooperation, and coordina-tion with affected permittees or les-sees, landowners involved, the resource advisory council, any State having lands or responsible for managing re-sources within the area to be covered by such a plan, and the interested pub-lic. The plan shall become effective upon approval by the authorized offi-cer. The plans shall- (1) Include terms and conditions under §§ 4130.3, 4130.3-1, 4130.3-2 4130.3-3, and subpart 4180 of this part; (2) Prescribe the livestock grazing practices necessary to meet specific re-source objectives; NEW TEXT Allotment management plans or other activity plans intended to serve as the functional equivalent of allotment management plans may be developed by permittees or lessees, State Trust Land Offices, and the BLM. When such plans affecting the administration of grazing allotments are developed, the following provisions apply: (a) An allotment management plan or other activity plans intended to serve as the functional equivalent of allotment management plans shall be prepared in consultation with affected permittee(s) or lessee(s).The plan shall become effective upon approval by the authorized officer. The plans shall- (1) Include terms and conditions under §§4130.3, 4130.3-1, 4130.3-2 and 4130.3-3; (2) Prescribe the livestock grazing practices necessary to meet resource objectives including consideration of the viability of the ranching unit;

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	64	Subpart 4120 - Grazing Management	<p>OLD TEXT (g) Temporary nonuse and conservation use may be approved by the authorized officer if such use is determined to be in conformance with the applicable land use plans, allotment management plan or other activity plans and the provisions of subpart 4180 of this part. (1) Conservation use may be approved for periods of up to 10 years when, in the determination of the authorized officer, the proposed use will promote rangeland resource protection or enhancement of resource values or uses, including more rapid progress toward resource condition objectives; or (2) Temporary nonuse for reasons including but not limited to financial conditions or annual fluctuations of livestock, may be approved on an annual basis for no more than 3 consecutive years. Permittees or lessees applying for temporary nonuse shall state the reasons supporting nonuse. (h) Application for nonrenewable grazing permits and leases under §§ 4110.3-1 and 4130.6-2 for areas for which conservation use has been authorized will not be approved. Forage made available as a result of temporary nonuse may be made available to qualified applicants under § 4130.6-2. (i) Permits or leases may incorporate the percentage of public land livestock use (see § 4130.3-2) or may include private land offered under exchange-of-use grazing agreements (see § 4130.6-1). (j) Provisions explaining how grazing permits or authorizations may be granted for grazing use on state, county or private land leased by the Bureau of Land Management under "The Pierce Act" and located within grazing districts are explained in 43 CFR part 4600. [43 FR 29067, July 5, 1978, as amended at 47 FR 41711, Sept. 21, 1982; 49 FR 6453, Feb. 21, 1984; 49 FR 12704, Mar. 30, 1984; 53 FR 10234, Mar. 29, 1988; 53 FR 22326, June 15, 1988; 60 FR 9965, Feb. 22, 1995; 61 FR 29031, June 7, 1996; 61 FR 4227, Feb. 5, 1996] NEW TEXT (g) Temporary nonuse and conservation use may be approved by the authorized officer if such use is determined to be in conformance with the applicable land use plans, AMP or other activity plans and the provisions of subpart 2180 of this part. (1 Temporary nonuse for reasons including but not limited to financial conditions or annual fluctuations of livestock, may be approved on an annual basis for no more than 3 consecutive years. Permittees or lessees applying for temporary nonuse shall state the reasons supporting nonuse. (h) Application for nonrenewable grazing permits and leases under §§4110.3-1 and 4130.6-2 for areas for which conservation use has been approved. Forage made available as a result of temporary nonuse will be made available to qualified applicants under §4130.6-2. (i) Permits or leases may incorporate the percentage of public land livestock use (see §4130.3-2) or may include private land offered under exchange-of-use grazing agreements (see § 4130.6-1).</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	52	Subpart 4120 - Grazing Management	<p>OLD TEXT (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. [49 FR 6452, Feb. 21, 1984, as amended at 60 FR 9964, Feb. 22, 1995; 61 FR 4227, Feb. 5, 1996] NEW TEXT (f) Proposed range improvement projects may be reviewed in accordance with the requirements of the National Environmental Policy Act of 1989 (42 U.S.C. 4371 et. seq.). Issuance of Range Improvement Permits and Cooperative Agreements for range improvements may be reviewed pursuant to a categorical exclusion.</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	50	Subpart 4120 - Grazing Management	OLD TEXT (c) The authorized officer shall pro-vide opportunity for public participa-tion in the planning and environmental analysis of proposed plans affecting the administration of grazing and shall give public notice concerning the avail-ability of environmental documents prepared as a part of the development of such plans, prior to implementing the plans. The decision document fol-lowing the environmental analysisshall be considered the proposed deci-sion for the purposes of subpart 4160 of this part. (d) A requirement to conform with completed allotment managementplans or other applicable activity plans intended to serve as the functional equivalent of allotment management plans shall be incorporated into the terms and conditions of the grazing permit or lease for the allotment. (e) Allotment management plans or other applicable activity plans in-tended to serve as the functional equiv-alent of allotment management plans may be revised or terminated by the authorized officer after consultation, cooperation, and coordination with the affected permittees or lessees, land-owners involved, the resource advisory council, any State having lands or re-sponsible for managing resources with-in the area to be covered by the plan, and the interested public. [60 FR 9964, Feb. 22, 1995, as amended at 61 FR 4227, Feb. 5, 1996] NEW TEXT (c) A requirement to conform with completed allotment management plans or other applicable activity plans intended to serves as the functional equivalent of allotment management plans shall be incorporated into the terms and conditions of the grazing permit(s) and lease(s) for the allotment. (d) Allotment management plans or other applicable activity plans intended to serve as the functional equivalent of allotment management plans may be revised or terminated by the authorized officer after consultation, cooperation, and coordination with the affected permittees or lessees, landowners involved, any State having land or responsible for managing resources within the are to be covered by the plan.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	59	Subpart 4120 - Grazing Management	OLD TEXT (c) During the planning of the range development or range improvement programs, the authorized officer shall consult the resource advisory council, affected permittees, lessees, and mem-bers of the interested public. NEW TEXT (c) During the planning of the range development or range improvement programs, the authorized officer shall consult the resource advisory council, affected permittees, lessees, and members of the affected interest.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	63	Subpart 4120 - Grazing Management	OLD TEXT (b) The authorized officer shall con-sult, cooperate and coordinate with af-fected permittees or lessees, the State having lands or responsible for man-aging resources within the area, and the interested public prior to the issuance or renewal of grazing permits and leases. NEW TEXT (b) The authorized officer shall consult and coordinate with affected permittees and lessees, the State having lands or responsible for managing resources within the area, and the affected interest prior to the issuance or renewal of grazing permits and leases.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	56	Subpart 4120 - Grazing Management	OLD TEXT (b) The authorized officer may re-quire permittees or lessees to remove range improvements which they own on the public lands if these improve-ments are no longer helping to achieve land use plan or allotment goals and objectives or if they fail to meet the criteria under § 4120.3-4 of this title. (c) Whenever a grazing permit or lease is cancelled in order to devote the public lands covered by the permit or lease to another public purpose, includ-ing disposal, the permittee or lessee shall receive from the United States reasonable compensation for the ad-justed value of their interest in author-ized permanent improvements placed or constructed by the permittee or les-see on the public lands covered by the cancelled permit or lease. The adjusted value is to be determined by the au-thorized officer. Compensation shall not exceed the fair market value of the terminated portion of the permittee's or lessee's interest therein. Where a range improvement is authorized by a range improvement permit, the live-stock operator may elect to salvage materials and perform rehabilitation measures rather than be compensated for the adjusted value. NEW TEXT (a) Range improvements shall not be removed from the public lands without authorization. (b)Whenever a grazing permit or lease is cancelled in order to devote the public lands covered by the permit or lease to another public purpose, including disposal, the permittee or lessee shall receive from the United States reasonable compensation for the adjusted value of their interest in authorized permanent improvements placed or constructed by the permittee or lessee on the public lands covered by the cancelled permit or lease. The adjusted value is to be determined by the authorized officer. Compensation shall §4120.3-7 not exceed the fair market value of the terminated portion of the permittee's or lessee's interest therein. Where a range improvement is authorized by a range improvement permit, the livestock operator may elect to salvage materials and perform rehabilitation measures rather than be compensated for the adjusted value.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	51	Subpart 4120 - Grazing Management	OLD TEXT (b) Prior to installing, using, main-taining, and/or modifying range im-provements on the public lands, per-mittees or lessees shall have entered into a cooperative range improvement agreement with the Bureau of Land Management or must have an approved range improvement permit. (c) The authorized officer may re-quire a permittee or lessee to maintain and/or modify range improvements on the public lands under § 4130.3-2 of this title. NEW TEXT (b) Prior to installing, using, maintaining, and/or modifying range improvements on the public lands, permittees or lessees shall have an approved range improvement permit or have entered into a cooperative range improvement agreement with the Bureau of Land Management or must have an approved range improvement permit. (c) The authorized officer may require a permittee or lessee to maintain and/or modify range improvements on the public lands under §4130.3-2 of this title.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	55	Subpart 4120 - Grazing Management	§ 4120.3-8 Range improvement fund. OLD TEXT (a) In addition to range developments accomplished through other resource management funds, authorized range improvements may be secured through the use of the appropriated range improvement fund. One-half of the available funds shall be expended in the State and district from which they were derived. The remaining one-half of the fund shall be allocated, on a priority basis, by the Secretary for underground rehabilitation, protection and improvement of public rangeland ecosystems. NEW TEXT (a) In addition to range developments accomplished through other resource management funds, authorized range improvements may be secured through the use of the appropriated range improvement fund. THREEFOURTHS of the available funds shall be expended in the district from which they were derived. The remaining one FOURTH of the fund shall be allocated, on a priority basis, by the Secretary for underground rehabilitation, protection and improvement of public rangeland ecosystems. RATIONALE Comment [AS28]: The rule should be modified to enlarge and empower each District with additional funds to install, modify, remove, or maintain range improvements, including implementation of ground treatments.
Subpart 4130 - Authorizing Grazing Use								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	22	Subpart 4130 - Authorizing Grazing Use	Crossing Authorizations, issue decisions that are immediately effective and provide for permittee flexibility for livestock movement. o Crossing authorizations that do not create substantial forage and/or water use requirements and are not anticipated to result in significant resource impacts should be approved under categorical exclusions or determinations of NEPA adequacy through decisions that are immediately effective.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	42	Subpart 4130 - Authorizing Grazing Use	Exchange of Use: Exchange of Use provisions in the grazing regulations should clarify that an Exchange of Use agreement and associated private grazing lease are not required for a grazing permittee in an "open range" or "fence out" state to receive credit for private forage that is available upon unfenced private land within a BLM grazing allotment. In cases where multiple permittees run in common in an allotment/grazing unit, credit for such unfenced private forage that is not secured under a private grazing lease should be apportioned to each permittee on a proportional basis commensurate with their active AUMs authorized on the public land portion of the allotment/grazing unit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	41	Subpart 4130 - Authorizing Grazing Use	Conflicting Uses: The grazing regulations should specify that whenever livestock grazing is reduced due to implementation of a conflicting use (mining, habitat improvement, etc.) the grazing reduction will be quantified based upon a determination of the actual reduction in the livestock carrying capacity due to the change in use based upon quantitative monitoring.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	24	Subpart 4130 - Authorizing Grazing Use	Non-Renewable Permits and Leases, issue decisions immediately effective and provide permittee flexibility to manage for fluctuations in weather or other management needs. o In addition to providing for immediately effective decisions to provide for permittee flexibility to manage for fluctuations in weather or to address other management needs in association with Non Renewable Permits and Leases, similar provisions should be created to cover situations where permittees request authorization for additional forage use on an annual basis as temporary nonrenewable use under an existing BLM term grazing permit.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	3	Subpart 4130 - Authorizing Grazing Use	The majority of current BLM grazing permits are authorized with specific dates and numbers of livestock. In reality, this method is not practical due to the ever-changing environments on rangelands across the West. An example of this may be a permit that has an authorized "on date" of May 15 every year. Environmental conditions at May 15 will be different from year to year, but unfortunately, BLM staff and grazing permittees are forced to manage the land without variability and flexibility to account for this. Allowing field office staff to manage livestock grazing and rangelands based on current conditions will facilitate proper management of grazing allotments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	35	Subpart 4130 - Authorizing Grazing Use	The regulations must include and consider the strong connection with private land. While evaluating grazing use, consideration should take into account the linkage between private ranch lands and federal land permits. The potential negative consequences for rangelands if livestock grazing on BLM-managed land permit is restrictive or reduced must be stressed. In order to maintain business operations, possible conversion of private land holdings may result from not being able to make economic use of federally-managed lands. In areas where private lands and federally-managed lands are found in alternating sections (i.e., "checkerboard" lands) or where private lands make up a significant portion of large tracts of land, this increase in fragmentation would undoubtedly have a detrimental impact.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dearing	Jaydee abd Terry	Dearing Ranch	OR	1370	2	Subpart 4130 - Authorizing Grazing Use	Targeted grazing authorizations should be separate from regular grazing authorizations. That is, the Animal Unit Months (AUM) authorized by such permits should not count as or reduce the number of AUMs permitted under existing grazing preference or term permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	11	Subpart 4130 - Authorizing Grazing Use	Recognition of private property rights- BLM administered land is intermingled with private and state trust land in New Mexico. Ownership of base property, whether private land or privately owned water rights is a requirement to hold a grazing permit. As private land owners, permittees cannot be required to compromise their private property rights to hold a grazing permit. Private property rights are basic rights guaranteed under the Constitution.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huffaker	Tyler		CO	821	1	Subpart 4130 - Authorizing Grazing Use	Grazing restrictions should not and cannot be applied generally. Grazing restrictions have to be considered uniquely on every allotment. Unfortunately, I am under a general restriction of rest every 5 years simply because that was a practice instituted 25 years ago and it applied to mutliple allotments across our state. This should be considered uniquely by area managment as I have suggested that we meet and work together to design a more thorough and beneficial management plan.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	1	Subpart 4130 - Authorizing Grazing Use	Crossing Authorizations, issue decisions that are immediately effective and provide for permittee flexibility for livestock movement. o Crossing authorizations that do not create substantial forage and/or water use requirements and are not anticipated to result in significant resource impacts should be approved under categorical exclusions or determinations of NEPA adequacy through decisions that are immediately effective.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	8	Subpart 4130 - Authorizing Grazing Use	Crossing Authorizations, issue decisions that are immediately effective and provide for permittee flexibility for livestock movement. o Crossing activities that do not create substantial forage and/or water use requirements and are not anticipated to result in significant resource impacts should not require crossing permit authorizations, or at least should be approved under categorical exclusions or determinations of NEPA adequacy through decisions that are immediately effective.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Zarrello	Dana	The Cloud Foundation		1337	7	Subpart 4130 - Authorizing Grazing Use	Livestock producers are not being charged for actual forage consumed, leaving the taxpaying public to make up the difference, as well as to pay for rangeland remediation made necessary by livestock overgrazing. Such an unfair (additional) subsidy, based on obsolete calculations, is particularly difficult to defend in today's challenging economic climate. According to one study, "... the BLM is generally underestimating forage consumption for a cow/calf pair by 732 lb/month, or nearly 50%. To account for this in grazing permits and annual billings, stocking rates must be reduced by a corresponding amount.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Prunty Rianda	Kyla		NV	902	3	Subpart 4130 - Authorizing Grazing Use	Crossing authorizations should be issued effective immediately. This would help the BLM to respond to changes in management needs in a timely manner and avoid excessive administrative workload. Immediate decisions are crucial in maintaining health of the land in dynamic environments. Water availability sometimes makes it necessary to move cattle immediately.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	22	Subpart 4130 - Authorizing Grazing Use	When evaluating the environmental impacts of its new grazing regulations, BLM should consider all of the aforementioned externalities associated with livestock grazing, and should raise the fees to accommodate the increasing costs of agency management, lost ecosystem services, and to offset public health costs, among others. The current fees do not accurately reflect the true costs of grazing borne by the public. The low costs of grazing permits are a relic of political interests existing 40 years ago, and do not reflect the spirit of fair, balanced multiple use existing today. The rates have been below market rates for far too long and we implore the BLM to raise the rates to a modern level and stop subsidizing a microcosm of public lands users at the expense of others.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	1	Subpart 4130 - Authorizing Grazing Use	On December 19, 2014, Congress amended section 402 of FLPMA, 43 U.S.C. § 1752, to, among other things, (1) ensure the terms and conditions of an expired grazing permit, including renewal for 10 years, continue under a new permit until environmental analysis is completed, 43 U.S.C. §1752(c)(2); (2) authorize the Secretary to categorically exclude certain grazing decisions from analysis in an Environmental Assessment ("EA") or Environmental Impact Statement ("EIS") including trailing and crossing of livestock across public land, id. at §1752(h)(1); and (3) authorize the Secretary to prioritize the environmental analysis of grazing authorizations. Id. at §1752(i). The Proposed Rule should implement these provisions to provide direct regulatory support for decisions that ensure the continuity of grazing management and provide flexibility to correctly analyze grazing decisions as resources become available. Trailing and crossing decisions are particularly hamstrung by the existing regulations because BLM will ultimately deny a trailing request claiming that there is no time or money to write and EA. Field Offices are rarely able to respond to rapidly changing range conditions, such as severe snow storms under the existing regulations which require additional analysis. While, Field Offices should be able to authorize changes in trailing or crossing without a categorical exclusion, proposed decision, and protest period, too often the Field Office simply denies the request based on the assumption that EA is necessary. The EA, proposed decision, and protest period completely eliminate any flexibility in most trailing or crossing situations and fail to implement the amendments adopted more than five years ago.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	32	Subpart 4130 - Authorizing Grazing Use	These regs should require the BLM to coordinate, consult and cooperate with existing permittees before giving a crossing permit to the applicant.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	2	Subpart 4130 - Authorizing Grazing Use	Rather than eliminate the protest period for grazing permit renewals that are completed under a fully NEPA compliant process, consider establishing regulations for automatic renewal of permits pursuant to section 402(c) of FLPMA without the need to issue a decision or create a subsequent appeal process. -If a grazing permit transferred to a new owner's name remains subject to the terms and conditions that were previously in effect, it is essentially being processed pursuant to section 402(c) of FLPMA. Thus, consider regulations for automatic renewal of such permits without the need to issue a decision or create a subsequent appeal process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harshbarger	Jean	4W Ranch	WY	1435	3	Subpart 4130 - Authorizing Grazing Use	Also, bison need to be under "fence in" laws (rules). They must be contained as allowing them to intermingle with cattle can cause adverse consequences.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harshbarger	Jean	4W Ranch	WY	1435	2	Subpart 4130 - Authorizing Grazing Use	When allowing bison as permitted livestock, require they be managed as such.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	21	Subpart 4130 - Authorizing Grazing Use	The regulations should allow permittees to hold title to improvements under Section 4 permits as was the case before 1994- Title to improvements is an important part of the value of the ranch unit. By requiring all improvements to be held under cooperative agreements even when the BLM has not participated in the cost of construction and installation is a disincentive to investing in improving federal lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	Wilson Ranch, Inc	NV	1288	1	Subpart 4130 - Authorizing Grazing Use	Permit and Lease Transfers, allow issuance of renewals that only change ownership name without the need to issue a decision or create a subsequent appeal process. o If a grazing permit transferred to a new owner's name remains subject to the terms and conditions that were previously in effect, it is essentially being processed pursuant to section 402(c) of FLPMA. Thus, consider regulations for automatic renewal of such permits without the need to issue a decision or create a subsequent appeal process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	17	Subpart 4130 - Authorizing Grazing Use	Further, the current BLM regulations authorize livestock grazing not to exceed the livestock carrying capacity of the allotment. 43 C.F.R. § 4130.3-1. Livestock carrying capacity "means the maximum stocking rate possible without inducing damage to vegetation and related resources." Id. § 4100.0-5. The revisions must also retain the requirement for BLM to periodically review the permitted use for an allotment. (Currently at Id. § 4110.3). These reviews must be conducted at least once a decade, using peer-review scientific and quantifiable methods. The reviews must also include water quality monitoring and prohibition on the destruction of native vegetation to increase forage for livestock. With the proposed revisions, BLM must seek to strengthen enforcement of rangeland health standards. If grazing use is not consistent with the standards of rangeland health or exceeds the carrying capacity, BLM shall reduce permitted use. Id. § 4110.3-2. These revisions must help BLM be stronger on enforcement of the existing duties, instead of more relaxed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	41	Subpart 4130 - Authorizing Grazing Use	The WSGB comments that amendments to the FLPMA at Section 402 of the FLPMA from the 2014 Grazing Improvement Act should be included in the revised BLM Grazing Regulations. The WSGB comments that a new Section at 4130.6, Titled " Renewal of grazing permits", be constructed to include the major portions of the 2014 Act that authorizes grazing permit renewals under the existing terms and conditions until such time as the BLM has "fully processed" an application to renew a grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	13	Subpart 4130 - Authorizing Grazing Use	Furthermore, BLM NEPA regulations should require interested publics to post a bond, in an amount sufficient to indemnify permittees for their potential loss, when they seek a stay or injunction, or otherwise delay through court actions the ability for a permittee to utilize his authorized AUMs on his allotment, which bond shall be forfeited by the interested public if their suit is not completely upheld in every point.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lonn	Jeff		MT	642	3	Subpart 4130 - Authorizing Grazing Use	You should set a fair and equitable grazing fee based on comparable private land prices.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Parks	William	Sunnyside Livestock Co, LLC	WY	1393	3	Subpart 4130 - Authorizing Grazing Use	Wild Horses and management fall under the same government/BLM rules of now permitted grazing on said BLM as on Private held and owned personal property or should be if loose animals found on BLM are subject to rules and penalties then so should public animals "Horses" on private.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kunzler	Kelly, Kerry or B	Kunzler Sheep & Cattle LLC	UT	900	1	Subpart 4130 - Authorizing Grazing Use	When there is an abundance of forage, it makes much mores sense to allow more grazing to utilize it rather than leave it for future fire fuels and hazards. These hazard affect not only us as permit holders, but the public in general.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	5	Subpart 4130 - Authorizing Grazing Use	What is more, to clarify the existing statutory authority for livestock crossing/trailing, the following language must be added to §4130.6-3 Crossing Permits: "After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed,". Further, MWGA's members request that the regulations be amended to specify that crossing/trailing authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing is within the existing carrying capacity of the area included in the crossing permit and further that the approval of the trailing practice shall not be subject to NEPA review;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	21	Subpart 4130 - Authorizing Grazing Use	We suggest amending the provision to recognize modern privacy expectations in the regulation as follows: "§ 4130.7 Ownership and identification of livestock OLD TEXT (from 2006 BLM Grazing Regulations): (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives the permittee or lessee control of the livestock by the permittee or lessee shall be filed with the authorized officer and approval received prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. NEW TEXT: (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives a permittee or lessee control of the livestock by another individual or business shall be reviewed by the authorized officer for approval prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. The authorized officer shall file a statement in the permit or lease file that 'the livestock control agreement has been reviewed and approved.'"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Clark	Haley			1236	1	Subpart 4130 - Authorizing Grazing Use	we see issues facing on and off dates for BLM allotments. Flexibility to use our permit, within the constraints of natural resource availability, with either earlier or later on and off dates. We have had several occasions where the weather was too cold and wet on May 1, our turnout date, and we had to delay for almost two weeks, before turning out on the allotment. This made it so we could only use our allotment for about a month, instead of the full duration. The process to change these dates is lengthy and not user-friendly to producers or BLM employees as well as decreases the use of natural resources.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	20	Subpart 4130 - Authorizing Grazing Use	We recommend the following language be added to §4130.6-3: § 4130.6-3 Crossing permits Add just before existing language: "After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed," Additionally, we recommend the following changes to the existing regulations: OLD TEXT (from 2006 BLM Grazing Regulations): A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public land or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. NEW TEXT: A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public land or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing does not reduce or otherwise affect the existing permitted use of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	53	Subpart 4130 - Authorizing Grazing Use	We recommend that crossing permits be denied where there is a demonstrated risk of livestock disease transmitted to native species, especially bighorn sheep; or if such trailing use would cause a significant adverse impact to BLM special status species, especially those proposed or listed under provisions of the ESA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	19	Subpart 4130 - Authorizing Grazing Use	We recommend revising the exchange-of-use regulation as follows: "§ 4130.6-1 Exchange-of-use grazing agreements. (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands in the same allotment when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Vivian		NV	1134	1	Subpart 4130 - Authorizing Grazing Use	We feel that any aums that may have been suspended in the past on any given allotment, whether under our ownership, or that of our predecessors should be available to be reactivated at any time the forage is available on the range. This may even be in the middle of the season. The rancher should not have to do a lengthy application for this to happen. In the past, the BLM has suspended aums for different reasons, then they act like those aums never existed.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	44	Subpart 4130 - Authorizing Grazing Use	We can find no Federal law that authorizes the Secretary of Interior to impose a grazing fee in excess of the Grazing Fee in the Executive Order from the President. The requirement for a surcharge also was an unfunded mandate to the BLM because it causes local BLM officials to not only have to determine when a surcharge is required under the Babbitt Regulations, but causes the BLM to have to fill out numerous forms and reports on this subject.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1079	11	Subpart 4130 - Authorizing Grazing Use	We can find no Federal law that authorizes the Secretary of Interior to impose a grazing fee in excess of the Grazing Fee in the Executive Order from the President. The requirement for a surcharge also was an unfunded mandate to the BLM because it causes local BLM officials to not only have to determine when a surcharge is required under the Babbitt Regulations, but causes the BLM to have to fill out numerous forms and reports on this subject.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	909	10	Subpart 4130 - Authorizing Grazing Use	We can find no Federal law that authorizes the Secretary of Interior to impose a grazing fee in excess of the Grazing Fee in the Executive Order from the President. The requirement for a surcharge also was an unfunded mandate to the BLM because it causes local BLM officials to not only have to determine when a surcharge is required under the Babbitt Regulations, but causes the BLM to have to fill out numerous forms and reports on this subject.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	27	Subpart 4130 - Authorizing Grazing Use	We can find no Federal law that authorizes the Secretary of Interior to impose a grazing fee in excess of the Grazing Fee in the Executive Order from the President. The requirement for a surcharge also was an unfunded mandate to the BLM because it causes local BLM officials to not only have to determine when a surcharge is required under the Babbitt Regulations, but causes the BLM to have to fill out numerous forms and reports on this subject.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lee	Don L. (Bebo)	New Mexico Federal Lands Council	NM	1366	4	Subpart 4130 - Authorizing Grazing Use	We can find no Federal law that authorizes the Secretary of Interior to impose a grazing fee in excess of the Grazing Fee in the Executive Order from the President. The requirement for a surcharge also was an unfunded mandate to the BLM because it causes local BLM officials to not only have to determine when a surcharge is required under the Babbitt Regulations, but causes the BLM to have to fill out numerous forms and reports on this subject.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	5	Subpart 4130 - Authorizing Grazing Use	We are particularly concerned with this issue because we have to cross our BLM allotments to get to and from our US Forest Service allotments, and do not feel it is necessary to have crossing permits to cross our own allotments when such crossing activities are incidental and short-lived and do not result in substantial forage and/or water use requirements and are not anticipated to result in significant resource impacts.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	3	Subpart 4130 - Authorizing Grazing Use	We applaud the BLM for considering streamlining opportunities, such as using different billing schedules for different allotment sizes, eliminating the protest period for permit and lease renewals and expediting the approval of permit or lease transfers when the only change is the name of the permittee or lessee.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tomera	Thomas		NV	797	1	Subpart 4130 - Authorizing Grazing Use	TNR's , grazing AUM's put back in to use. By returning rested or non-used AUM's back into use and rotation it allows for me as a land user to disperse my herd in different allotments than maybe previously used. If the AUM's are approved and available they should be put to use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	11	Subpart 4130 - Authorizing Grazing Use	TNC believes livestock grazing can support management of critical threats, especially invasive annual grasses, by shifting timing, intensity, and duration of livestock grazing use to appropriately address annual conditions. The BLM could clarify how existing language regarding temporary use in §4110.3-1, §4130.4, and §4130.6 can be combined to provide flexibility to adjust existing permits or issue temporary non- renewable grazing permits. This flexibility still needs accountability under NEPA, including a programmatic analysis as appropriate. Utility of these provisions will be best aided by policy and demonstrations utilizing the flexibility already described in these regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	23	Subpart 4130 - Authorizing Grazing Use	Title to range improvements should be with those who hold Section 4 permits and ownership shared on cooperative agreements in proportion to amounts contributed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	43	Subpart 4130 - Authorizing Grazing Use	These regs should require the BLM to coordinate, consult and cooperate with existing permittees before giving a crossing permit to the applicant.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	26	Subpart 4130 - Authorizing Grazing Use	These regs should require the BLM to coordinate, consult and cooperate with existing permittees before giving a crossing permit to the applicant.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miller	Stephen J.	Miller Land Co., Inc.	AZ	1484	2	Subpart 4130 - Authorizing Grazing Use	There seems to be an apparent conflict between NRPA and current grazing regulations. This should be resolved. CFR 4130.6-2 of the regulations indicates that on an interval basis a permit holder could request nonrenewable grazing permit or lease. This would be granted when forage conditions would support this request.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bailey	Ray & Jacqueline		NV	863	1	Subpart 4130 - Authorizing Grazing Use	There needs to be a flexible time table for turning out livestock. When the years are dry, we must graze earlier to prevent large fires in the summer months.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	581	4	Subpart 4130 - Authorizing Grazing Use	There must be scientifically-based evaluations of range conditions and permittee compliance before lease renewals and transfers. Reduction of administrative time and effort on lease renewals or transfers is not a justifiable change.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Devlin	Todd			1120	11	Subpart 4130 - Authorizing Grazing Use	The Taylor Grazing Act does not consider Bison domestic and prohibits the takings of AUMs for indigenous animals. Therefore, any federal, state, or local wildlife management agency that is or intends to manage Bison or any other indigenous ruminates that negatively affect the AUMs for domestic livestock on Federal lands should be opposed and forbidden. All Bison raised domestically with intend to graze on Federal lands within a county should have approval of local governing body after public input and comment is received.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	14	Subpart 4130 - Authorizing Grazing Use	The rules should require preparation of a grazing suitability analysis. Authority for this comes from the multiple use mandate embedded in the Federal Land Policy and Management Act (FLPMA) and the identification of "lands . . . chiefly valuable for grazing and raising forage crops" as required by the Taylor Grazing Act.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	25	Subpart 4130 - Authorizing Grazing Use	The rules should discourage grazing in currently intact ungrazed areas. Ungrazed areas are rare and valuable. BLM should not allow livestock grazing in existing ecosystems that are healthy and largely ungrazed. Let's not extend the harm to grazing to ecosystems that have been spared up to now. Similarly, please take steps to permanently terminate grazing authorizations in existing vacant or inactive allotments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Casey		NV	748	4	Subpart 4130 - Authorizing Grazing Use	The regulations should revise the provisions regarding Exchange of Use Agreements to clarify that Exchange of Use will be linked to the respective state law regarding "fence out" and "open range." This issue is primarily focused on railroad "checkerboard" where the ownership of the various parcels are complicated and involve many different landowners. The current regulations seem to support that unfenced private lands in these areas are not available to grazing permittees without a signed lease or court order. We are convinced that Nevada law, including case law and Attorney General opinions, have consistently held that Nevada, as a "fence out" state, grants permission to grazing "livestock running at large on the ranges or commons" (NRS 568.300) of unfenced private lands. The regulations should clarify that trailing/crossing permits process. In some circumstances, ranchers have to cross neighbor's allotments which they do not have a grazing permit. In most of these cases, private-party agreements have been the norm. However, we do understand that in some cases (especially recently), some conflict has cropped up. For only cases in which a conflict between neighbors has come up, a trailing permit outlining the obligations of the trailing rancher is likely warranted. No trailing permit should be required when a rancher is moving livestock on their own allotment. In these circumstances, the alternative is to gather livestock in a concentrated manner to a central location where water often needs to be available, load them onto multiple trucks, haul them to another centralized location, and unload them in a concentrated manner. The localized impacts of this alternative are much higher than dispersed, incidental trailing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	25	Subpart 4130 - Authorizing Grazing Use	The regulations should revise the provisions regarding Exchange of Use Agreements to clarify that Exchange of Use will be linked to the respective state law regarding "fence out" and "open range." This issue is primarily focused on railroad "checkerboard" where the ownership of the various parcels is complicated and involve many different landowners. The current regulations seem to support that unfenced private lands in these areas are not available to graziers without a signed lease or court order. We are convinced that Nevada law, including case law and Attorney General opinions, have consistently held that Nevada, as a "fence out" state, grants permission to grazing "livestock running at large on the ranges or commons" (NRS 568.300) of unfenced private lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	26	Subpart 4130 - Authorizing Grazing Use	The regulations should clarify the trailing/crossing permits process. In some circumstances, ranchers have to cross neighbor's allotments on which they do not have a grazing permit. In most of these cases, private-party agreements have been the norm. However, we do understand that in some cases (especially recently), some conflict has cropped up. For only cases in which a conflict between neighbors has come up, a trailing permit outlining the obligations of the trailing rancher is likely warranted. No trailing permit should be required when a rancher is moving livestock on their own allotment. In these circumstances, the alternative is to gather livestock in a concentrated manner to a central location where water often needs to be available, load them onto multiple trucks, haul them to another centralized location, and unload them in a concentrated manner. The localized impacts of this alternative are much higher than dispersed, incidental trailing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	19	Subpart 4130 - Authorizing Grazing Use	The regulations should clarify that trailing/crossing permits process. In some circumstances, ranchers have to cross neighbor's allotments which they do not have a grazing permit. In most of these cases, private-party agreements have been the norm. However, we do understand that in some cases (especially recently), some conflict has cropped up. For only cases in which a conflict between neighbors has come up, a trailing permit outlining the obligations of the trailing rancher is likely warranted. No trailing permit should be required when a rancher is moving livestock on their own allotment. In these circumstances, the alternative is to gather livestock in a concentrated manner to a central location where water often needs to be available, load them onto multiple trucks, haul them to another centralized location, and unload them in a concentrated manner. The localized alternative are much higher than dispersed, incidental trailing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goodwin	Jay	BLM Caliente Field Office		1154		Subpart 4130 - Authorizing Grazing Use 1	the possible revision of the CFRs for grazing immediately made me think of the Sons and Daughters section (4130.7(f)(1-4). I suggest the language of the subsection be revised to include an age limit of the sons and daughters who are allowed to run under the parent's permit - e.g. that sons and daughters under a State's legally recognized age of majority (adulthood) may run under a parent's permit. To me, the language of 4130.7(f)(1) very strongly implies that sons and daughters is intended to mean youth - the rancher's kids, high school age, junior high, maybe college, building their own herd of livestock or preparing to run the outfit. I have no doubt that was the intent when the section was written. The language in the subsection is "sons and daughters are participating in educational or youth programs related to animal husbandry, agribusiness, or rangeland management, or are actively involved in the family ranching operation and are establishing a livestock herd with the intent of assuming part or all or the family ranch operation." Allowing a son or daughter with their own established livestock operation, who have their own daughters and sons, are living in a separate house/location/ranch from the parent, to run under the parent's permit is not the intent of this section in my opinion, though that is how we are told (at the Range Administration class) to interpret it since no age is specified.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry	Williams Coulee Grazing District	MT	961		Subpart 4130 - Authorizing Grazing Use 2	The Outcome Based Grazing concept could be beneficial to District members by allowing grazing flexibility, depending on conditions. Good relationships and communications between the District, permittees, and BLM staff would contribute to mutual grazing management decisions that could benefit wildlife, wildfire fuel loads, and economics of all involved.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hagenbarth	Jim		MT	1003		Subpart 4130 - Authorizing Grazing Use 1	The numbers on the permits need to not only reflect the carrying capacity of the resource, must must also be temporarily increase or decreased if the forage indicates it. This will help harvest fuel loads if necessary and flelxbility of kind and number of livestock along with time of year is essential for good tactical rangeland management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015		Subpart 4130 - Authorizing Grazing Use 14	the Livestock Groups recommend revising as follows: At § 4130.1-1(b)(1), insert the following: (1) Renewal of permit or lease. (i) The authorized officer will deem the applicant for renewal of a grazing permit or lease, and any affiliate, to have a satisfactory record of performance if the authorized officer determines the applicant and affiliates to be in substantial compliance with the terms and conditions of the existing Federal grazing permit or lease for which renewal is sought, and with the rules and regulations applicable to the permit or lease. Any determination must be based upon previous adjudicated claims of non-compliance or upon claims of non- compliance that would be subject to adjudication either before or simultaneously with making the determination. Any adverse determination that results in the nonrenewal of the expiring grazing permit only results in the non- renewal of the Grazing Permit, and not the cancellation of the Grazing Preference and associated Permitted Use which shall remain attached to the base property and be available through application and transfer procedures at 43 C.F.R. § 4110.2-3 to the owner or controller of the base property that can qualify for a grazing permit. Any cancellation of Preference and Permitted Use shall only occur as part of Subpart 4170 of this title.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Shephard	Ed	Public Lands Foundation		1128	5	Subpart 4130 - Authorizing Grazing Use	The grazing fee formula or the base fee used in the formula needs to be reviewed and the possibility of raising the fee or adding a service charge to provide funding to shorten the time needed to process permits should be considered. In addition, the disparity between Federal grazing fees and State and private leases and the need to increase the fees to at least cover the cost of administration needs to be examined.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kunzler	Kelly, Kerry or B	Kunzler Sheep & Cattle LLC	UT	900	2	Subpart 4130 - Authorizing Grazing Use	The first topic we would like to address is the reason we are required to renew our BLM grazing permits every 10 years. We are a ranch that runs both sheep and cattle on our own private ground as well as BLM and Forest Service permits. We are 5th generation stewards of these permits and of the land. There has been no issues or violations with our rights to the permits. Because of the involvement of the WWP and similar special interest groups, the protests seem to complicate our being able to continue to utilize our permits. If we have been issued these permits, and with no problems from our end, we feel it is an unnecessary step and frustration.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schultz	Nick		MT	1026	1	Subpart 4130 - Authorizing Grazing Use	The BLM needs to recognize that the amount of forage a yearling eats is much less than what a cow/calf pair eats. However, the BLM does not consider the differences. Any college text book recognizes the differences, the regulations should as well.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dowell	Samuel		OR	750	2	Subpart 4130 - Authorizing Grazing Use	Temporary Non Renewable Permits -The Blm cannot currently act in a timely to manage high fuel loads. When fuel loads build up permittees apply and often times the Blm states they simply don't have the resources to gather data, write NEPA, and issue a decision before the end of the grazing season. In my allotment there is repeated fire history and the flexibility to manage heavy fuel loading through grazing in great need.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Rama			1191	8	Subpart 4130 - Authorizing Grazing Use	suggest that adaptive, flexible management practices be the first step in addressing the BLM's concerns with an allotment instead of AUM reductions. This flexibility should be in cooperation with the affected permitte(s) and take in to account their observations of the landscape, since they tend to be on the allotment more than anyone else. Prior to any reduction in AUMs, appropriate steps should be taken to ensure that it is, in fact, livestock grazing that is causing any problems on the allotment. This should include looking closely at wild horse damages, drought or flood conditions, fire impacts and any other extenuating circumstances that often put the health of the allotment at risk. Then, if any of those conditions are the source of negative allotment conditions, livestock grazing should be managed appropriately to help mitigate those impacts. The BLM should look at livestock grazing as a tool for BLM employees to use, instead of a scapegoat for the issues that arise on our rangelands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	35	Subpart 4130 - Authorizing Grazing Use	Subparagraph (g) must be eliminated from the regulations. If access across private lands are necessary, those access agreements must be negotiated separately and must not be part of any permit renewal or approval process.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	15	Subpart 4130 - Authorizing Grazing Use	Strike § 4130.3-2 subsection (e)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon			1227	7	Subpart 4130 - Authorizing Grazing Use	Stewardship Agreements; BLM has never fulfilled their obligation to set up Stewardship Permits. There is enough experience and education in the ranching community to work such a program.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bailey	Ray & Jacqueline		NV	863	1	Subpart 4130 - Authorizing Grazing Use	Staying out later in the fall when there is a wet year prevents to much left over forage that will also promote fires the following year.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Caines	Philip	Caines Land & Livestock	WY	1496	4	Subpart 4130 - Authorizing Grazing Use	Since the trailing routes that a livestock owner uses to move between his allotments seldom change, it would seem to make sense to include these authorizations in the permit, again saving time and resources. Should a situation arise that a different route is utilized, that authorization could be addressed at that time. By restricting the authorized time allowed for the crossing, the impact to the allotments being crossed can be limited. I also think that the permittees whose allotments are being crossed should be notified of all authorized crossings. I don't believe this takes place currently.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harris	Donna		OR	701	5	Subpart 4130 - Authorizing Grazing Use	Set a fair equitable grazing fee based on comparable private land prices for grazing. No longer should the public subsidize the ranching Industry with pricing as low as \$1.35 per AUM! Private leasing costs are closer to \$23.40 per AUM. The low fees are essentially a Welfare program for the ranching industry, when fees are in the \$1 to \$2 range per AUM.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cascade	Robyn	Great Old Broads for Wilderness; Northern San Juan chapter	CO	1102	7	Subpart 4130 - Authorizing Grazing Use	Set a fair and equitable grazing fee based on comparable private land prices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carney	Cheryl		TX	179	6	Subpart 4130 - Authorizing Grazing Use	Set a fair and equitable grazing fee based on comparable private land prices.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spotts	Richard		UT	1235	12	Subpart 4130 - Authorizing Grazing Use	Set a fair and equitable grazing fee based on comparable private land prices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	15	Subpart 4130 - Authorizing Grazing Use	Set a fair and equitable grazing fee based on comparable land prices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Collett	Brian		ID	1005	9	Subpart 4130 - Authorizing Grazing Use	Rental "surcharges" should be eliminated.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goetz	Katie	New Mexico Department of Agriculture		1115	9	Subpart 4130 - Authorizing Grazing Use	Related to the modification of permits or leases detailed in § 4130.3-3, the BLM states that "To the extent practical, the authorized officer shall provide to affected permittees or lessees [and multiple other parties] an opportunity to review, comment and give input during the preparation of reports that evaluate monitoring and other data that are used as a basis for making decisions to increase or decrease grazing use, or to change the terms and conditions of a permit or lease." What about providing such data to the permittee/lessee would be impractical?
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon			1227	9	Subpart 4130 - Authorizing Grazing Use	Public access should not be a condition for issuing a grazing permit; BLM has 1000's of acres of land that are surrounded by private land. Some in our area has been identified for disposal. All of it should be. There are many legitimate avenues BLM can use to acquire access across private land, however, this method is un-American, probably un-Constitutional, and if not illegal, should be.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	24	Subpart 4130 - Authorizing Grazing Use	Preference AUM's have been legally adjudicated to qualified private base property and specifically authorized by Congress in the TGA. BLM can cancel a grazing permit for cause, but the legal adjudication of Preference AUM's to qualified base property becomes one of the sticks in the bundle of economic values to the ranch and the disposition of Preference AUM's is NOT inexorably tied to the status of a grazing permit/lease. Preference AUM's are a covenant to the private base property. An applicant has to own a Preference to qualify for a grazing permit/lease, but the owner of the base property to which this Preference is attached is not required by federal law to activate this Preference unless they want to apply for a BLM grazing permit/lease. "Permit value" is based on the number of Preference AUM's attached to that ranch. If BLM can cancel Preference AUM's, then the western family ranches will have lost a BIG part of the stability to these ranches dependent on economic access to BLM grazing permits. The TGA, the FLPMA, and the PRIA ALL say that "stability of the livestock industry", is a goal.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hopkins	Paul		OH	288	1	Subpart 4130 - Authorizing Grazing Use	Please allow for expanded grazing permit retirement and long-term non-use for conservation purposes in your revisions. This is necessary for wildlife management in certain areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Farr	Roy			1243	3	Subpart 4130 - Authorizing Grazing Use	Permit value should be based on the number of preference AUMs attached to the ranch to maintain stability of the local livestock industry. Furthermore, while public land is to be held in trust by the federal government and managed on behalf of the public, the public has no right, title or interest.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Pamela		ID	585	2	Subpart 4130 - Authorizing Grazing Use	NO leasing permits should be issued or reissued without conscientious, science-based assessment of the vibrancy of the land. If the results are anything but favorable, the leases should be retired. Long-term rest for the land should be a common conservation strategy.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	18	Subpart 4130 - Authorizing Grazing Use	No grazing reduces the amount of money paid to the state and federal governments for the authorized use of BLM allotments. The federal courts have ruled that it is illegal for the BLM to issue a grazing permit to NOT graze livestock which was Babbitt's conservation use idea. Since that ruling by the federal court, there is no logic or legal basis for those who are not in the livestock business to qualify for a grazing permit or lease.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	581	2	Subpart 4130 - Authorizing Grazing Use	New regulations should include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. New regulations should set a fair and equitable grazing fee based on comparable private land prices.New regulations should allow for grazing permit retirement and long-term non-use for conservation purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	7	Subpart 4130 - Authorizing Grazing Use	NCA further requests that all vacant allotments be assigned to an authorized applicant within 12 months of becoming vacant to mitigate increased fire risks and provide for improved rangeland health through the use of livestock grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	17	Subpart 4130 - Authorizing Grazing Use	MWGA's members see a need for the BLM to have more flexibility to deal with the growing and widespread problem of rangeland fires. In this vein, free-use grazing permits for fuel reduction should be added to the list as a tool to reduce dangerous fuel loads on public lands. To accomplish this, §4130.3-1 should be amended by striking subparagraph (c) as currently written. In turn, §4130.3-2 should be amended as follows: §4130 free-use grazing permits. (b) the authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation blse is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements ofthis part. Further, §4130.3-2(b) should be amended to add in a new subparagraph (4), which reads: "The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire" and a new subparagraph (4) which reads: "Targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO.".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	15	Subpart 4130 - Authorizing Grazing Use	MWGA's members calls for reform of 43 CFR § 4130.1-2, conflicting applications. In instances where there are conflicting applications for livestock grazing use, the current regulations allow the authorized officer to consider whether an applicant allows public ingress or egress across privately owned or controlled land to public lands. An applicant who does not allow public access their own private property should not be penalized for protecting his private property rights.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Skylstad	Michelle		WA	319	1	Subpart 4130 - Authorizing Grazing Use	Mustang and burros should be accounted for on the side of providing ample space for wildlife. Lobbying by pro-cattle groups should not be the determining factor. In addition, fees should be adjusted to more accurately reflect the value of the public land being used for private profit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Mark		NV	1390	1	Subpart 4130 - Authorizing Grazing Use	Long trails and occasional rare occurrences, should be monitored and kept in perspective for actual use of allotments or if there is a problem or areas of concern. Crossing allotments and trailing usually are very different, as trailing animals for long distances mean they must graze and those AUMs should be accounted for but not denied.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Naples	Jean		NY	386	5	Subpart 4130 - Authorizing Grazing Use	It is important that the BLM set a fair grazing fee based upon comparable private land prices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Tammy			1137	2	Subpart 4130 - Authorizing Grazing Use	Increase permitted use consistent with multiple use objectives in areas where fire occurrence is higher than historic norms.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moss	Paul		MN	856	5	Subpart 4130 - Authorizing Grazing Use	Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	20	Subpart 4130 - Authorizing Grazing Use	In the appropriate section of 4130.6-1 we offer the amendment of striking the wording which limits this application of an agreement... ORIGINAL [NOT 2006/unknown origin] TEXT (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands in the same allotment when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use." COMMENTER'S SUGGESTED NEW TEXT (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	17	Subpart 4130 - Authorizing Grazing Use	In the appropriate section of 4130.5 we offer these amendments... ORIGINAL 2006 TEXT (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of grazing use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds. COMMENTER'S SUGGESTED NEW TEXT (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds; (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire; or (5) Targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO. Further edit by striking subsection (e): "(e) The kinds of indigenous animals authorized to graze under specific terms and conditions" Further edit at subsection (f) as follows: ORIGINAL 2006 TEXT (COULD NOT FIND ORIGINAL TEXT FOR A SUBSECTION (F)) COMMENTER'S SUGGESTED NEW TEXT (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; Further add this new subsection: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kershner	Bryce		OR	1048	1	Subpart 4130 - Authorizing Grazing Use	In order to avoid arbitrary decision-making and require decisions to be based on quantitative data, clarifications to the definition of "Monitoring" to use quantitative data. Quantitative data should be used when the authorized officer determines carrying capacity. Therefore the first paragraph discussing mandatory terms and conditions as follows could be changed to include the following language: "§ 4130.3-1 Mandatory terms and conditions. "The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data ."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Trask	Tracy		SD	7	1	Subpart 4130 - Authorizing Grazing Use	I'm a rancher that ranches on all private land and am tired of subsidizing the public grazing ranchers who are in direct competition with me! To make it fair and equitable I believe that all federal grazing land should be put up for public bid and then it would bring what it's worth on the market basis! Right now in my area of western SD the public grazing fee is only bringing in a fraction of what the permit would bring if it was offered on the open market! The private land aum cost is around \$50/aum and the Govt permit cost is around \$1.50/aum.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miller	Wes		WY	695	1	Subpart 4130 - Authorizing Grazing Use	I wish that local BLM athorities had more flexibiity in regulating permits. Especially in having some lee-way on the turn- out and come-off dates of the permits. That way we could go out when the weather has permitted the grass to have grown enough and if it is later in the year due to the cold , we could stay a little longer to make it worth even going.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eberhardt	Marty			1184	1	Subpart 4130 - Authorizing Grazing Use	I think that efforts should be focused on permanently retiring federal grazing permits from willing sellers. This is a win-win solution: ranchers can retire with a cash sum, and the rangelands can recover from overgrazing and be better enjoyed by all of the BLM's other, non-ranching users: outdoor recreation enthusiasts such as hunters, fisherman, hikers, campers, birdwatchers, photographers, etc. Such an approach also benefits the non-bovine plant and animal diversity that the BLM is pledged to protect.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spratling	Craig	N-1 Grazing Board Nevada	NV	868	1	Subpart 4130 - Authorizing Grazing Use	I request that item (2) be deleted from this section. I do not believe that family members be limited to less that 50% of the AUM's on their parents permit. Many permit holders are getting close to the age of retirement if they are not already there. Their sons and daughters may be running more than 50% of the livestock on their parents ranch. Sometimes these family members will not gain control of their parents grazing permit until they inherit it.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brownlee	Peg		MT	792	1	Subpart 4130 - Authorizing Grazing Use	I belive that a cost analysis should be done in each permitting area, to determine if the money from permits vs. the cost of administering the permits is even close.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Slate		UT	1069	1	Subpart 4130 - Authorizing Grazing Use	Grazing seasons of use need to be allowed to be moved as a block of time 45 days later and or earlier with a "not to exceed" limit on total use days and AUMs. i.e. permitted season of use is 1-Nov. - 15-Mar. with the option to shift use from 15-Sep. - 1-Feb. or 15-Dec.- 30-Apr. and increase numbers up to a certain percentage. This would allow for changes in season of use depending on phenological growth stages of the plants from year to year for allotments without a pasture system and the oportunity to harvest additional forage on high production years.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vanderryn	Judith		CO	1423	3	Subpart 4130 - Authorizing Grazing Use	Grazing permit fees should also adequately reflect the price that the public pays for managing these lands rather than permit leasers paying pennies on the dollar for use of these public resources.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kitson	Jamie		WA	575	1	Subpart 4130 - Authorizing Grazing Use	Grazing of livestock must be contained to areas that are not sensitive habitats for endangered or threatened wildlife species.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chandler	Pamela		NC	1030	3	Subpart 4130 - Authorizing Grazing Use	Grazing fees should be comparable to the private sector and not a give away that burdens the taxpayer!
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kirk	Stephan		ID	694	1	Subpart 4130 - Authorizing Grazing Use	Grazing fees must cover cost to administer the leases.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	France	Tom	National Wildlife Federation		1237	9	Subpart 4130 - Authorizing Grazing Use	Furthermore, we request that BLM include the EIS specific conditions when it would be acceptable for the agency to vacate or close allotments when there were permit holders who were willing to waive their permits without preference.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gonzalez	Don		ID	712	1	Subpart 4130 - Authorizing Grazing Use	Flexibility in grazing seasons. Allow rangeland specialists to seasonally adjust grazing season based on range readiness, management needs, and permittee desires. Allow season of use to vary but not exceed the permitted AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	908	2	Subpart 4130 - Authorizing Grazing Use	Federal Courts have ruled that the change to the BLM Grazing Regulations in RR 94 that allowed “conservation use” grazing permits are illegal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	8	Subpart 4130 - Authorizing Grazing Use	Federal Courts have ruled that the change to the BLM Grazing Regulations in RR 94 that allowed "conservation use" grazing permits are illegal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	20	Subpart 4130 - Authorizing Grazing Use	Exchange of Use provisions in the grazing regulations should clarify that an Exchange of Use agreement and associated private grazing lease are not required for a grazing permittee in an "open range" or "fence out" state to receive credit for private forage that is available upon unfenced private land within a BLM grazing allotment. In cases where multiple permittees run in common in an allotment/grazing unit, credit for such unfenced private forage that is not secured under a private grazing lease should be apportioned to each permittee on a proportional basis commensurate with their active AUMs authorized on the public land portion of the allotment/grazing unit.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lanham	Miteshell	Lander County, NV	NV	1219	8	Subpart 4130 - Authorizing Grazing Use	Exchange of Use Agreements provisions in the regulations should be revised to clarify that Exchange of Use will be linked to the respective state law regarding "fence out" and "open range." This issue is primarily focused on railroad "checkerboard" lands where the ownership of the various parcels are complicated and involve many different landowners. The current regulations seem to support that unfenced private lands in these areas are not available to grazing permittees without a signed lease or court order. We are convinced that Nevada law, including case law and Attorney General opinions, have consistently held that Nevada, as a "fence out" state, grants permission to grazing "livestock running at large on the ranges or commons" (NRS 568.300) of unfenced private lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lanham	Miteshell	Lander County, NV	NV	1219	9	Subpart 4130 - Authorizing Grazing Use	Exchange of Use Agreements provisions in the regulations should be revised to clarify that Exchange of Use will be linked to the respective state law regarding "fence out" and "open range." This issue is primarily focused on railroad "checkerboard" lands where the ownership of the various parcels are complicated and involve many different landowners. The current regulations seem to support that unfenced private lands in these areas are not available to grazing permittees without a signed lease or court order. We are convinced that Nevada law, including case law and Attorney General opinions, have consistently held that Nevada, as a "fence out" state, grants permission to grazing "livestock running at large on the ranges or commons" (NRS 568.300) of unfenced private lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	West	Paul		CO	333	1	Subpart 4130 - Authorizing Grazing Use	Every effort should be made to permanently retire grazing permits so that more lands can be restored to conditions that benefit all citizens.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	16	Subpart 4130 - Authorizing Grazing Use	Edit § 4130.3-2 subsection (f) to read: "(f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	32	Subpart 4130 - Authorizing Grazing Use	Dormant season use coupled with typical grazing season (late spring through summer) moderate use should be recognized in the permit renewa
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1080	4	Subpart 4130 - Authorizing Grazing Use	Current regulations eliminated the requirement that the BLM must conduct meaningful consultation, cooperation and coordination with grazing permittees and lessees. See Public Rangeland Improvement Act (PRIA), Section 8.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	8	Subpart 4130 - Authorizing Grazing Use	Crossing Authorizations, issue decisions that are immediately effective and provide for permittee flexibility for livestock movement. o Crossing authorizations that do not create substantial forage and/or water use requirements and are not anticipated to result in significant resource impacts should be approved under categorical exclusions or determinations of NEPA adequacy through decisions that are immediately effective.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	6	Subpart 4130 - Authorizing Grazing Use	Crossing Authorizations, issue decisions that are immediately effective and provide for permittee flexibility for livestock movement. - Crossing activities that do not create substantial forage and/or water use requirements and are not anticipated to result in significant resource impacts should not require crossing permit authorizations, or at least should be approved under categorical exclusions or determinations of NEPA adequacy through decisions that are immediately effective.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	6	Subpart 4130 - Authorizing Grazing Use	Crossing activities that do not create substantial forage and/or water use requirements and are not anticipated to result in significant resource impacts should not require crossing permit authorizations, or at least should be approved under categorical exclusions or determinations of NEPA adequacy through decisions that are immediately effective
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	16	Subpart 4130 - Authorizing Grazing Use	Consequently, MWGA's membership recommends that 43 C.F.R. §4110.1-2(d) be struck, which such section provides as a factor "public ingress or egress across privately owned or controlled land to public lands.";
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bellwood	Samantha	Nevada Department of Agriculture	NV	1009	12	Subpart 4130 - Authorizing Grazing Use	CFR 4130.6-3 - Crossing Permits: We support the streamlining of the crossing authorizations process. Crossing authorizations are categorically excluded from NEPA, however, they still require a Proposed Decision and Protest Process. NDA believes crossing authorizations should be completed administratively and be effective immediately and not subject to the Proposed Decision and Protest Process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beavers	Nancy		TN	201	1	Subpart 4130 - Authorizing Grazing Use	BLM's regulation updates should allow for grazing permit retirement and long-term non-use for conservation purposes
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ruch	Jeff	PEER		1131	3	Subpart 4130 - Authorizing Grazing Use	BLM should work with Congress to overhaul this outdated fee formula as part of any revision of grazing regulation.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jacobs	Quida		FL	82	2	Subpart 4130 - Authorizing Grazing Use	BLM should use of the best available science in livestock grazing decisions, and set a fair and equitable grazing fee based on comparable private land prices
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wood	Lorna		AL	202	3	Subpart 4130 - Authorizing Grazing Use	BLM should set a fair grazing fee based on private land prices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wood	Lorna		AL	202	1	Subpart 4130 - Authorizing Grazing Use	BLM should encourage permitting and other regulatory changes that encourage non-use of land for conservation purposes
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Larry J.	Moreau Grazing Association	SD	1498	1	Subpart 4130 - Authorizing Grazing Use	BLM should be following a nationally recognized, scientifically based method to determine livestock AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	909	9	Subpart 4130 - Authorizing Grazing Use	At present, the BLM seldom consults with the applicant or current permittees or lessees on exchange-of-use carrying capacity issues. BLM often discounts the carrying capacity of the exchange-of-use lands and is usually very conservative. · These regs should require the BLM to coordinate, consult and cooperate with existing permittees before giving a crossing permit to the applicant.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1079	10	Subpart 4130 - Authorizing Grazing Use	At present, the BLM seldom consults with the applicant or current permittees or lessees on exchange-of-use carrying capacity issues. BLM often discounts the carrying capacity of the exchange-of-use lands and is usually very conservative. · These regs should require the BLM to coordinate, consult and cooperate with existing permittees before giving a crossing permit to the applicant.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	909	5	Subpart 4130 - Authorizing Grazing Use	Applicants must be in the livestock business, this has been a criteria since the enactment of the Taylor Grazing Act in 1934. We are not aware of ANY language from Congress that has conveyed an opinion that BLM permittees or lessees should not be required to be in the livestock business. Applicants who are not in the livestock business do not intend to stock a BLM permit or lease with livestock.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1079	6	Subpart 4130 - Authorizing Grazing Use	Applicants must be in the livestock business, this has been a criteria since the enactment of the Taylor Grazing Act in 1934. We are not aware of ANY language from Congress that has conveyed an opinion that BLM permittees or lessees should not be required to be in the livestock business. Applicants who are not in the livestock business do not intend to stock a BLM permit or lease with livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	18	Subpart 4130 - Authorizing Grazing Use	Also, MWGA's membership recommends completely striking subsection (e) of §4130.3-2 and by adding a new subsection (i), which would read: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildlife. This action is not subject to Protest or Appeal if utilized.";
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	4	Subpart 4130 - Authorizing Grazing Use	allowing for temporary non-renewable grazing permits to be effective immediately without additional review at the regulatory level or with insufficient sideboards does not fulfill the need for accountability to counterbalance the risk inherent with additional flexibility, and is likely to increased conflict among users. TNC does not support this proposed revision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harris	Donna		OR	701	1	Subpart 4130 - Authorizing Grazing Use	Allow for grazing permit retirements for conservation purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hougham	Tom		IN	434	1	Subpart 4130 - Authorizing Grazing Use	Allow for grazing permit retirement and long-term non-use for conservation purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Johnson	PhilipB		WY	771	1	Subpart 4130 - Authorizing Grazing Use	Allow and promote rotational grazing; this will require additional cross fencing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	28	Subpart 4130 - Authorizing Grazing Use	Adjudicated AUM's in active use that could be canceled under this part are still in the carrying capacity of the allotment and they should become available to other qualified applicants to purchase from the BLM. This part of the Regulations should not be used to lower the amount of money received by the BLM for AUM's that, while no longer available to the permittee from whom they were canceled, remain a part of the carrying capacity.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	17	Subpart 4130 - Authorizing Grazing Use	Add a new subsection at § 4130.3-2 subsection (i) to read: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	30	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130 Free-use grazing permits. Range fires are becoming more frequent, intense, and widespread. Free-use grazing permits for fuel reduction should be added to the list as a tool to reduce fuel on public land. Edit the regulation at § 4130.3-1 by striking subsection (c) as follows: "Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part. Further edit at § 4130.3-2 as follows: "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds. (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire." (5) Targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO. Further edit by striking subsection (e): "(e) The kinds of indigenous animals authorized to graze under specific terms and conditions" Further edit at subsection (f) as follows: (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; Further edit by the addition of a new subsection: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Godwin	Nadine		NY	421	1	Subpart 4130 - Authorizing Grazing Use	[comment:421-1; 104.05]Rather than take the currently proposed approach to grazing regulations, I urge the BLM to look at matters with new eyes with the following intentions and goals in mind.• Plan for retirement of grazing permits in order to accommodate long-term nonuse for conservation purposes.• Make it a rule that grazing management must improve carbon sequestration in soils and analyze all grazing permits in the context of a threatening climate catastrophe.• Similarly, ensure grazing management preserves the habitat of grazed lands for native plant and wildlife species, including predators.• In particular, ensure environmental analyses carefully consider the habitat of species in crisis and the broader extinction crisis we are seeing today — and that threatens to become a lot worse.• And, finally, when any grazing permit is granted, charge market rate grazing fees.[comment end]

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	41	Subpart 4130 - Authorizing Grazing Use	Wildfire has increased in frequency and intensity. It is the most damaging factor to habitat values and forage production. The regulations should support responsible use of livestock grazing as a tool for fine-fuel reduction. The following changes will facilitate better use of free-use grazing permits and targeted grazing. Delete from 43 CFR 4131.3-1: "Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miller	Brooke	United States Cattlemen's Association	DC	1004	4	Subpart 4130 - Authorizing Grazing Use	We support an Instruction Memo to all field offices to assess if rangeland management tools other than reductions in active AUMs will accomplish allotment objectives. BLM should document when other factors, such as fire, roads, wild horses, drought, or invasive species impact rangeland conditions. Changes to BLM management should address the cause of problems, not simply reduce livestock grazing. When grazing plays a role in problems, it is important to use appropriate management, not just reduce AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Orchard	Charley		WY	1074	2	Subpart 4130 - Authorizing Grazing Use	TNR permitting must use a timely and adaptive approach. This can be achieved by allowing the authorized officer to make decisions to address resource concerns and to maintain healthy rangelands. The authorizing officer should be able to address resource concerns, utilize targeted grazing, incorporate vegetation treatments and implement fire recovery efforts in order to adjust to the changing environment in a timely manner. The requirement to consult, cooperate, and coordinate with interested public prior to a decision often times closes the “timing window” for any successful management action.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	42	Subpart 4130 - Authorizing Grazing Use	The WSGB comments that amendments to the FLPMA at Section 402 of the FLPMA from the 2014 Grazing Improvement Act should be included in the revised BLM Grazing Regulations. The WSGB comments that a new Section at 4130.6, Titled "Renewal of grazing permits", be constructed to include the major portions of the 2014 Act that authorizes grazing permit renewals under the existing terms and conditions until such time as the BLM has "fully processed" an application to renew a grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Guerry	Michael		ID	1487	2	Subpart 4130 - Authorizing Grazing Use	The grazing regulations should allow for greater flexibility in grazing permits, both in AUM numbers and seasons of use, to enable more nimble management based on seasonal conditions, fuels buildup, and forage availability. More specifically: * In the Great Basin where annual grasses dominate some areas, create an annual grassland designation to be managed, similar to, the ephemeral grasslands in the desert southwest. Permittees with annual grasslands would be permitted to graze them to a prescription not encumbered by a grazing preference. * Increase permitted use consistent with multiple use objectives in areas where fire occurrence is higher than historic norms. * Water rights for range improvement projects should be maintained and administered in accordance with State law. * Adaptive and outcome-based management needs to be flexible and responsive to fire and changing range conditions. * Provide flexibility within the terms and conditions of grazing permits to allow changed livestock numbers, and a few weeks time either side of the permit dates, for livestock grazing, as long as, the permitted use limit is not exceeded. * Utilize free use permits to manipulate vegetation to reduce fire risk. * Create a surcharge exception when the forage being made available is provided to another permittee to relieve the effects of drought, fire or other natural disasters.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Zarrello	Dana	The Cloud Foundation		1337	3	Subpart 4130 - Authorizing Grazing Use	The BLM utilizes the same Animal Unit Month (AUM) system as created decades ago to allocate range resources. Due to the drastically increased size of cows bred today - the BLM undercharges livestock for AUM use. "BLM is understating forage consumption by cow/calf pairs by a nominal 50% based on the average body condition and frame scores. The implication of this on stocking rates is obvious. Based on forage consumption alone, not considering proper utilization, forage capacity and capability factors, BLM is over stocking allotments 33% based on failure to take into account current cattle weights and calves." - Updating the Animal Unit Month, John G. Carter, Ph.D. (Attachment).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bellwood	Samantha	Nevada Department of Agriculture	NV	1009	10	Subpart 4130 - Authorizing Grazing Use	-Targeted grazing authorizations: These authorizations can facilitate site specific treatment of vegetation composition and structure to create fuel breaks or other vegetation management objectives. Suggested change is to increase the use of targeted grazing authorizations for vegetation management. Targeted grazing is an important tool to allow site specific treatments of vegetation composition and structure. This vegetation management tool can be used to target cheatgrass, create fuel breaks or other vegetation management objectives that may exist outside the grazing permit. Targeted grazing authorizations should be provided to the authorized officer to quickly adjust to changing environmental conditions. These authorizations should be administrative, effective immediately and not subject to the decision-making and Protest Process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Logan	donna		PA	221	5	Subpart 4130 - Authorizing Grazing Use	Set a fair and equitable grazing fee based on comparable private land pricesAllow for grazing permit retirement and long-term non-use for conservation purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	6	Subpart 4130 - Authorizing Grazing Use	Section 4130.2 Topic Grazing permits or leases (Management Flexibility Opportunities, Permit and Lease Flexibility) Comment/Observation Per the BLM talking points (attached). "Permit and Lease Flexibility Need: There is a need to provide timely response to resource or management needs within limits. Opportunity: There is an opportunity to provide limited flexibility in season of use for permittees to manage livestock in concert with climatic fluctuations or other management needs."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	5	Subpart 4130 - Authorizing Grazing Use	Section 4130 Topic Authorizing Grazing Use (Management Flexibility Opportunities, Crossing Authorizations) Comment/Observation Per the BLM talking points (attached). "Crossing Authorizations Need: Crossing authorizations are used to facilitate timely livestock movement to and from grazing allotments, however they currently require the same processing workload as typical 10-year grazing permits or leases. This hinders the ability of the BLM and permittee to be responsive to changes in management needs. These authorizations are currently categorically excluded from NEPA under certain conditions and most are administrative in nature, however, they require a Proposed Decision and protest period like renewals. Opportunity: The opportunity is to reduce permit renewal processing workload and time by issuing decisions immediately effective." Why are crossing authorizations needs not being anticipated, analyzed, and effects disclosed within the original NEPA process for an allotment permit authorization? Action Requested Action: Include crossing authorizations within the original NEPA process to streamline permit authorization.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	44	Subpart 4130 - Authorizing Grazing Use	Revise subsection (f): (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	40	Subpart 4130 - Authorizing Grazing Use	Quantitative data should be used to determine carrying capacity. The following changes to the mandatory terms and conditions should be made: "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davis	Tyler	Arizona Farm Bureau Federation	AZ	1122	2	Subpart 4130 - Authorizing Grazing Use	PLC's concern to avoid arbitrary decision-making and requiring decisions to be based on quantitative data was raised above in our proposed edit to the definition of "Monitoring" to use quantitative data. We also believe quantitative data should be used when the authorized officer determines carrying capacity. Therefore, modify the first paragraph discussing mandatory terms and conditions as follows: "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data." AZFB believes decision making regarding the administration of grazing permits needs to be made using proven and accepted scientific analysis and methods. Also, AZFB supports the use of current, peer-reviewed science to help determine the grazing capacity of public land leases.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davis	Tyler	Arizona Farm Bureau Federation	AZ	1122	3	Subpart 4130 - Authorizing Grazing Use	PLC's concern to avoid arbitrary decision-making and requiring decisions to be based on quantitative data was raised above in our proposed edit to the definition of "Monitoring" to use quantitative data. We also believe quantitative data should be used when the authorized officer determines carrying capacity. Therefore, modify the first paragraph discussing mandatory terms and conditions as follows: "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data." AZFB believes decision making regarding the administration of grazing permits needs to be made using proven and accepted scientific analysis and methods. Also, AZFB supports the use of current, peer-reviewed science to help determine the grazing capacity of public land leases.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goetz	Katie	New Mexico Department of Agriculture		1115	5	Subpart 4130 - Authorizing Grazing Use	Pertaining to BLM's authority to dictate the breed of livestock authorized to graze on a community allotment and/or to require "additional special marking or tagging", NMDA posits that brands and earmarks are sufficient to determine ownership. Breeds are nearly if not entirely impossible to identify within commercial (crossbred) herds of livestock.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carter	Susan		NM	849	3	Subpart 4130 - Authorizing Grazing Use	Permit retirement Buy-outs should be regularly employed, especially in important conservation areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Selman	Laura	HaroldSelman Inc	UT	800	1	Subpart 4130 - Authorizing Grazing Use	On/ Off Dates for Grazing: We need more flexibility with on/off dates. Producers know their conditions of the range and they know the weather conditions in the area they need to graze. At least 2 weeks and up to a month allowance should be given on permitted on/off dates. Conditions in the West are especially variable, meaning one year is not likely to be the same as the next year.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	57	Subpart 4130 - Authorizing Grazing Use	<p>OLD TEXT: § 4130.7 Ownership and identification of livestock. (a) The permittee or lessee shall own or control and be responsible for the management of the livestock which graze the public land under a grazing permit or lease. (b) Authorized users shall comply with the requirements of the State in which the public lands are located relating to branding of livestock, breed, grade, and number of bulls, health and sanitation. (c) The authorized officer may require counting and/or additional special marking or tagging of the authorized livestock in order to promote the orderly administration of the public lands.</p> <p>NEW TEXT: §4130.7 Ownership and identification of livestock. (a) The permittee or lessee shall own or control and be responsible for the management of the livestock which graze the public land under a grazing permit or lease. (b) Authorized users shall comply with the requirements of the State in which the public lands are located relating to branding of livestock, breed, grade, and number of bulls, health and sanitation. (c) The authorized officer may require counting and/or additional special marking or tagging of the authorized livestock in order to promote the orderly administration of the public lands. (1) The Bureau of Land Management will pay all costs associated with the required counting and/or additional special marking or tagging of the livestock. RATIONALE: Comment: Forcing permittees or lessees to expend monies on needless counting and/or marking or tagging is an expense that most permittees and/or lessees cannot afford. It is an unfunded mandate, therefore, the BLM must be responsible for all costs associated with such requirement. (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives the permittee or lessee control of the livestock by the permittee or lessee shall be filed with the authorized officer and approval received prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify duration of the agreement, and shall be signed by the parties to the agreement. (e) The brand and other identifying marks on livestock controlled, but not owned, by the permittee or lessee shall be filed with the authorized officer. (f) Livestock owned by sons and daughters of grazing permittees or lessees may graze public lands included within the permit or lease of their parents when the following conditions exist: (1) The sons and daughters are participating in educational or youth programs related to animal husbandry, agribusiness or rangeland management, or are actively involved in the family ranching operation and are establishing a livestock herd with the intent of assuming part or all of the family ranch operation. (2) The livestock owned by the sons and</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	55	Subpart 4130 - Authorizing Grazing Use	OLD TEXT: §4130.6-2 Nonrenewable grazing permits and leases. Nonrenewable grazing permits or leases may be issued on an annual basis to qualified applicants when forage is temporarily available, provided this use is consistent with multiple use objectives and does not interfere with existing livestock operations on the public lands. The authorized officer shall consult, cooperate and coordinate with affected permittees or lessees, the State having lands or responsible for managing resources within the area, and the interested public prior to the issuance of nonrenewable grazing permits or leases. NEW TEXT [adding "affected counties" and changing "interested public" to "affected interest"]: §4130.6-2 Nonrenewable grazing permits and leases. Nonrenewable grazing permits or leases may be issued on an annual basis to qualified applicants when forage is temporarily available, provided this use is consistent with multiple use objectives and does not interfere with existing livestock operations on the public lands. The authorized officer shall consult, cooperate and coordinate with affected permittees or lessees, affected counties, the State having lands or responsible for managing resources within the area, and the affected interest prior to the issuance of nonrenewable grazing permits or leases.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	51	Subpart 4130 - Authorizing Grazing Use	OLD TEXT: §4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment. (b) All permits and leases shall be made subject to cancellation, suspension, or modification for any violation of these regulations or of any term or condition of the permit or lease. (c) Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part. RATIONALE: Comment: Section 4180 needs to be completely removed and rewritten.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	58	Subpart 4130 - Authorizing Grazing Use	OLD TEXT: § 4130.8-3 Service charge. A service charge may be assessed for each crossing permit, transfer of grazing preference, application solely for nonuse or conservation use, and each replacement or supplemental billing notice except for actions initiated by the authorized officer. Pursuant to section 304(a) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1734(a)), calculation of the Bureau service charge assessed shall reflect processing costs and shall be adjusted periodically as costs change. Notice of changes shall be published periodically in the FEDERAL REGISTER. NEW TEXT [removing "conservation use"] § 4130.8-3 Service charge. A service charge may be assessed for each crossing permit, transfer of grazing preference, application solely for nonuse and each replacement or supplemental billing notice except for actions initiated by the authorized officer. Pursuant to section 304(a) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1734(a)), calculation of the Bureau service charge assessed shall reflect processing costs and shall be adjusted periodically as costs change. Notice of changes shall be published periodically in the FEDERAL REGISTER.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	54	Subpart 4130 - Authorizing Grazing Use	OLD TEXT: § 4130.5 Free use grazing permits. (a) A free use grazing permit shall be issued to any applicant whose residence is adjacent to public lands within grazing districts and who needs these public lands to support those domestic livestock owned by the applicant whose products or work are used directly and exclusively by the applicant and his family. The issuance of free-use grazing permits is subject to §4130.1-2. These permits shall be issued on an annual basis. These permits cannot be transferred or assigned. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds. NEW TEXT [eliminating "conservation use"]: § 4130.5 Free-use grazing permits. (a) A free-use grazing permit shall be issued to any applicant whose residence is adjacent to public lands within grazing districts and who needs these public lands to support those domestic livestock owned by the applicant whose products or work are used directly and exclusively by the applicant and his family. The issuance of free-use grazing permits is subject to §4130.1-2. These permits shall be issued on an annual basis. These permits cannot be transferred or assigned. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds. [43 FR 29067, July 5, 1978, as amended at 49 FR 6453, Mar. 30, 1984. Redesignated at 60 FR 9965, Feb. 22, 1995, and amended at 60 FR 9966, Feb 22, 1995] § 4130.6 Other grazing authorizations. Exchange-of-use grazing agreements, nonrenewable grazing permits or leases, crossing permits, and special grazing permits or leases have no priority for renewal and cannot be transferred or assigned. [43 FR 29067, July 5, 1978, as amended at 47 FR 41711, Sept. 21, 1982. Redesignated at 60 FR 9965, Feb. 22, 1995] § 4130.6-1 Exchange-of-use grazing agreements. (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands in the same allotment when use under such an agreement will be in harmony with the management objectives for the allotment and will

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	53	Subpart 4130 - Authorizing Grazing Use	<p>OLD TEXT: § 4130.3 Modification of permits or leases. Following consultation, cooperation and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public the authorized officer may modify terms and conditions of the permit or lease when the active grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives or is not in conformance with the provisions of subpart 4180 To the extent practical, the authorized officer shall provide to affected permittees or lessees, States having lands or responsibility for managing resources within the affected area, and the interested public an opportunity to review, comment and give input during the preparation of reports that evaluate monitoring and other data that are used as a basis for making decisions to increase or decrease grazing use, or to change the terms and conditions of a permit or lease. [60 FR 9966, Feb. 22, 1995] OLD TEXT: §4130.4 Approval of changes in grazing use within the terms and conditions of permits and leases. (a) Applications for changes in grazing use should be filed with the authorized officer before the billing notices for the affected grazing use have been issued. Applications for changes in grazing use filed after the billing notices for the affected grazing use have been issued and which require the issuance of a replacement or supplemental billing notice shall be subject to a service charge under § 4130.8-3 of this title. (b) Changes in grazing use within the terms and conditions of the permit or lease may be granted by the authorized officer. Permittees and lessees may apply to activate forage in temporary nonuse or conservation use or to place forage in temporary nonuse or conservation use, and may apply for the use of forage that is temporarily available on designated ephemeral or annual ranges. NEW TEXT: §4130.4 Approval of changes in grazing use within the terms and conditions of permits and leases. (a) Applications for changes in grazing use should be filed with the authorized officer before the billing notices for the affected grazing use have been issued. Applications for changes in grazing use filed after the billing notices for the affected grazing use have been issued and which require the issuance of a replacement or supplemental billing notice shall be subject to a service charge under § 4130.8-3 of this title. (b) Changes in grazing use within the terms and conditions of the permit or lease may be granted by the authorized officer. Permittees and lessees may apply to activate forage in temporary nonuse to place forage in temporary nonuse and may apply for the use of forage that is temporarily available on designated ephemeral or annual ranges. RATIONALE: Comment: Conservation use was ruled unlawful in the court case PLC vs Babbitt (98-1991) 529 U.S. 728 (2000)</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	52	Subpart 4130 - Authorizing Grazing Use	OLD TEXT: § 4130.3-2 Other terms and conditions. The authorized officer may specify in grazing permits or leases other terms and conditions which will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands. These may include but are not limited to: (a) The class of livestock that will graze on an allotment; (b) The breed of livestock in allotments within which two or more permittees or lessees are authorized to graze; (c) Authorization to use, and directions for placement of supplemental feed, including salt, for improved livestock and rangeland management on the public lands; (d) A requirement that permittees or lessees operating under a grazing permit or lease submit within 15 days after completing their annual grazing use, or as otherwise specified in the permit or lease, the actual use made; (e) The kinds of indigenous animals authorized to graze under specific terms and conditions; (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; (g) The percentage of public land use determined by the proportion of livestock forage available on public lands within the allotment compared to the total amount available from both public lands and those owned or controlled by the permittee or lessee; (h) A statement disclosing the requirement that permittees or lessees shall provide reasonable access across private and leased lands to the Bureau of Land Management for: the orderly management and protection of the public lands. NEW TEXT: § 4130.3-2 Other terms and conditions. The authorized officer may specify in grazing permits or leases other terms and conditions which will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands. These may include but are not limited to: (a) Authorization to use supplemental feed, including salt, for improved livestock and rangeland management on the public lands; (b) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils (c) The percentage of public land use determined by the

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	49	Subpart 4130 - Authorizing Grazing Use	OLD TEXT: § 4130.2 Grazing permits or leases: (a) Grazing permits or leases shall be issued to qualified applicants to authorize use on the public lands and other lands under the administration of the Bureau of Land Management that are designated as available for livestock grazing through land use plans. Permits or leases shall specify the types and levels of use authorized, including livestock grazing, suspended use, and conservation use. These grazing permits or leases shall also specify terms and conditions pursuant to §§4130.3, 4130.3-1, and 4130.3-2. (b) The authorized officer shall consult, cooperate and coordinate with affected permittees and lessees, the State having lands or responsible for managing resources within the area, and theinterested public prior to the issuance or renewal of grazing permits and leases. (c) Grazing permits or leases convey no right, title, or interest held by the United States in any lands or resources. (d)The term of grazing permits or leases authorizing livestock grazing on the public lands and other lands under the administration of the Bureau of Land Management shall be 10 years unless- (1) The land is being considered for disposal; (2) The land will be devoted to a public purpose which precludes grazing prior to the end of 10 years; (3) The term of the base property lease is less than 10 years, in which case the term of the Federal permit or lease shall coincide with the term of the base property lease: or (4) The authorized officer determines that a permit or lease for less than 10 years is in the best interest of sound land management. (e) Permittees or lessees holding expiring grazing permits or leases shall be given first priority for new permits or leases if: (1) The lands for which the permit or lease is issued remain available for domestic livestock grazing; (2) The permittee or lessee is in compliance with the rules and regulations and the terms and conditions in the permit or lease; (3) The permittee or lessee accepts the terms and conditions to be included by the authorized officer in the new permit or lease (f) The authorized officer will not offer, grant or renew grazing permits or leases when the applicants, including permittees or lessees seeking renewal, refuse to accept the proposed terms and conditions of a permit or lease. (g) Temporary nonuse and conservation use may be approved by the authorized officer if such use is determined to be in conformance with the applicable land use plans, allotment management plan or other activity plans and the provisions. of subpart 4180 of this part. (1) Conservation use may be approved for periods of up to 10 years when , in the determination of the authorized officer, the proposed nonuse will promote rangeland resource protection or enhancement of resource values or uses, including more rapid progress toward resource condition objectives; or (2) Temporary nonuse for reasons including but not limited to financial conditions or annual fluctuations of

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	59	Subpart 4130 - Authorizing Grazing Use	OLD TEXT: (1) Allowing livestock or other privately owned or controlled animals to graze on or be driven across these lands: NEW TEXT: (1) Unreasonably allowing livestock or other privately owned or controlled animals to graze on or be driven across these lands: (i) Without a permit or lease, and annual grazing authorization. For the purposes of this paragraph, grazing bills for which payment has not been received do not constitute grazing authorization. (ii) In violation of the terms and conditions of a permit, lease, or other grazing use authorization including, but not limited to, livestock in excess of the number authorized; (iii) In an area or at a time different from that authorized; or (iv) Failing to comply with a requirement under §4130.7(c) of this title. (2) Installing, using, maintaining, modifying, and/or removing range improvements without authorization; (3) Cutting, burning, spraying, destroying, or removing vegetation without authorization; (4) Damaging or removing U.S. property without authorization; (5) Molesting, harassing, injuring, poisoning or causing death of livestock authorized to graze on these lands and removing authorized livestock without the owner's consent; (6) Littering; (7) Interfering with lawful uses or users including obstruction free transit through or over public lands by force, threat, intimidation, signs, barrier or locked gates; (8) Knowingly or willfully making a false statement or representation in base property certifications, grazing applications, range improvement permit applications, cooperative range improvement agreements, actual use reports and/or amendments thereto; (9) Failing to pay any fee required by the authorized officer pursuant to this part, or making payment for grazing use of public lands with insufficiently funded checks on a repeated and willful basis; (10) Failing to reclaim and repair any lands, property, or resources when required by the authorized officer; (11) Failing to reclose any gate or other entry during periods of livestock use. (c) Performance of an act listed in paragraphs (c) (1), (c) (2) or (c) (3) of this section where public land administer by the Bureau of Land Management is involved or affected, the violation is related to grazing use authorized by a permit or lease issued by the Bureau of Land Management, and the permittee or lessee has been convicted or otherwise found to be in violation of any of these laws or regulations by a court or by final determination of an agency charged with the administration of these law or regulations, and not further appeals are outstanding, constitutes a prohibited act that may be subject to the civil penalties set forth at §4170.1-1. (1) Violations of Federal or State laws or regulations pertaining to the: (i) Placement of poisonous bait or hazardous devices designed for the destruction of wildlife; (iii) Application or storage of pesticides, herbicides, or other hazardous materials; (iii) Alteration or destruction of natural stream courses without authorization; (iv)

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miller	Brooke	United States Cattlemen's Association	DC	1004	1	Subpart 4130 - Authorizing Grazing Use	OLD TEXT: "The authorized officer shall periodically review the level of active use specified in a grazing permit/lease and may make changes to the terms and conditions as needed to accomplish allotment objectives. The AO shall first determine if livestock grazing is the causal factor for not achieving allotment objectives based on long-term rangeland monitoring trends. If the current livestock grazing program is determined to be the causal factor, the AO shall first implement changes in the management program to include, changes in seasons of use, duration and timing of use, or rangeland improvements to accomplish a trend towards achieving allotment objectives before reducing active AUM's. Any reductions in active use will be placed in suspension." NEW TEXT [addition of "but not be limited to"]: "The authorized officer shall periodically review the level of active use specified in a grazing permit/lease and may make changes to the terms and conditions as needed to accomplish allotment objectives. The AO shall first determine if livestock grazing is the causal factor for not achieving allotment objectives based on long-term rangeland monitoring trends. If the current livestock grazing program is determined to be the causal factor, the AO shall first implement changes in the management program to include, but not be limited to, changes in seasons of use, duration and timing of use, or rangeland improvements to accomplish a trend towards achieving allotment objectives before reducing active AUM's. Any reductions in active use will be placed in suspension."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	50	Subpart 4130 - Authorizing Grazing Use	OLD TEXT § 4130.3 Terms and conditions. Livestock grazing permits and leases shall contain terms and conditions determined by the authorized officer to be appropriate to achieve management and resource condition objectives for the public lands and other lands administered by the Bureau of Land Management, and to ensure conformance with the provisions. NEW TEXT [removing "of subpart 4180"]: § 4130.3 Terms and conditions. Livestock grazing permits and leases shall contain terms and conditions determined by the authorized officer to be appropriate to achieve management and resource condition objectives for the public lands and other lands administered by the Bureau of Land Management, and to ensure conformance with the provisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tomera	Thomas		NV	797	8	Subpart 4130 - Authorizing Grazing Use	No more AUM's taken away from range by different environmental groups. NO RETIRING OF AUMS PERMANENTLY BY "PURCHASING". The passing of bills in regional legislatures that allow for AUM's to be purchased and then permanently retired from use is not legal nor is it what the BLM has described as the entire purpose of public land grazing. Grazing is a tool that has many benefits. Reevaluate all AUM's in every grazing management area to be able to give back suspended AUM's and non-use because there is more grass and shrubs then there has been in all areas in the last fifty years. All AUM's retired or in use should be calculated in when evaluating an allotments numbers.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harrington	Pam	Trout Unlimited		1193	1	Subpart 4130 - Authorizing Grazing Use	Mandate grazing permits be based on range conditions and not the calendar. Allow changes to be made every season, not based on 5-year permit renewals. Have the results dictate how an allotment is managed.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holland	Delwin		OR	29	1	Subpart 4130 - Authorizing Grazing Use	Increase grazing fees to fair market value!
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Olson	Vicki		MT	941	3	Subpart 4130 - Authorizing Grazing Use	In the section Conflicting applications it should be made clear that denying access to private land should have no effect on a grazing lease.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gammett	Glenda		OR	1382	7	Subpart 4130 - Authorizing Grazing Use	In order to avoid arbitrary decision-making and require decisions to be based on quantitative data, clarifications to the definition of "Monitoring" to use quantitative data. Quantitative data should be used when the authorized officer determines carrying capacity. Therefore the first paragraph discussing mandatory terms and conditions as follows could be changed to include the following language:
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reukauf	Robert		MT	703	1	Subpart 4130 - Authorizing Grazing Use	I believe that the grazing permit should be good for 20 years instead of the 10 currently. With the shortage of available staff to do this job, as well as monitoring at the local level, a 20 year interval would be fine, and a lot easier to administer.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	24	Subpart 4130 - Authorizing Grazing Use	Having livestock control agreements subject to Freedom of Information Act (FOIA) disclosure discloses private financial information and serves no public purpose. The language should be revised to permit BLM to review the control agreement but not require that it be included in files subject to FOIA disclosure: "§ 4130.7 Ownership and identification of livestock. (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives a permittee or lessee control of the livestock by another individual or business shall reviewed by the authorized officer for approval prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. The authorized officer shall file a statement in the permit or lease file that 'the livestock control agreement has been reviewed and approved.'"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Franko	Rich		MT	1422	1	Subpart 4130 - Authorizing Grazing Use	Grazing fees would be changed by the allotment not by using actual use records.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Woods	James		CA	1129	1	Subpart 4130 - Authorizing Grazing Use	Grazing fee's at a minimum should be at least \$38.00 each month for one cow and one calf.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlisle	Celeste	Return to Freedom Wild Horse Conservation	CA	1016	5	Subpart 4130 - Authorizing Grazing Use	Grazing fees (given a base value of \$1.23 in 1966) on public lands are market-driven, and not for the purposes of cost-recovery. In 1986, an Executive Order decreed that the grazing fee could never fall below \$1.35. Now in 2020, that grazing fee is indeed \$1.35, which does not recoup costs (though it is not intended to), and, importantly, has not been adjusted for inflation. The EA should address updated grazing fees that are not prohibitive, but are fair market value.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	39	Subpart 4130 - Authorizing Grazing Use	Granting public access across private land should not be required to obtain approval of an application for grazing use and/or a grazing permit. The portion of 43 C.F.R. § 4110.1-2(d) which provides as a factor "public ingress or egress across privately owned or controlled land to public lands" should be deleted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	38	Subpart 4130 - Authorizing Grazing Use	Granting public access across private land should not be required to obtain approval of an application for grazing use and/or a grazing permit. The portion of 43 C.F.R. § 4110.1-2(d) which provides as a factor "public ingress or egress across privately owned or controlled land to public lands" should be deleted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jacobson	Susan		CO	631	5	Subpart 4130 - Authorizing Grazing Use	Evaluate the current fees charged for grazing on public lands and move toward assessing market-based, not highly government-subsidized, fees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	43	Subpart 4130 - Authorizing Grazing Use	Delete subsection (e): "(e) The kinds of indigenous animals authorized to graze under specific terms and conditions"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bowers	James	Horseshoe I Ranch	MT	1403	2	Subpart 4130 - Authorizing Grazing Use	Crossing authorizations: make crossing authorizations immediately effective. Opportunity for better grazing management.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	47	Subpart 4130 - Authorizing Grazing Use	Crossing (or trailing) permits are useful tools for grazing management. Revisions in the language will improve use of the permits and better incorporate provisions passed by Congress in P.L. 113-291. 43 CFR §4130.6-3 should be modified as below: § 4130.6-3 Crossing permits After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed," "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing does not reduce or otherwise affect the existing permitted use of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	48	Subpart 4130 - Authorizing Grazing Use	Crossing (or trailing) permits are useful tools for grazing management. Revisions in the language will improve use of the permits and better incorporate provisions passed by Congress in P.L. 113-291. 43 CFR §4130.6-3 should be modified as below: § 4130.6-3 Crossing permits After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed," "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing does not reduce or otherwise affect the existing permitted use of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	46	Subpart 4130 - Authorizing Grazing Use	Clarification of the exchange of use regulations will reduce confusion and improve use of this tool to best manage intermingled private and public lands. The exchange of use language should be revised as follows: "§ 4130.6-1 Exchange-of-use grazing agreements. (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands in the same allotment when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyatt	Leedru		NM	1436	2	Subpart 4130 - Authorizing Grazing Use	-Bills: Any permit for less than 100 AUM's should be treated similar to private lease rather than a section 3 permit.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	32	Subpart 4130 - Authorizing Grazing Use	At 4130.6-1, Exchange of Use: The WSGB comments that language in the current regulations that restricts exchange of use permits to ONLY lands owned or controlled by the applicant within the allotment be changed to again allow lands owned or controlled outside the allotment to be offered for exchange of use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	29	Subpart 4130 - Authorizing Grazing Use	At 4130.1-2, Conflicting applications: Please take out item (d) which now says the BLM can use whether or not an applicant will allow public access across private land as a criteria for receipt of BLM AUM's. The WSGB comments that whether or not a Section 3 permittee allows access over their private lands has nothing to do with respect to qualifications for receipt of a grazing permit or additional Federal AUM's. This recommendation is also in the PLC scoping comment report.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goetz	Katie	New Mexico Department of Agriculture		1115	1	Subpart 4130 - Authorizing Grazing Use	As written, the following regulation undermines the longstanding principle of consultation, cooperation, and coordination. Treating proposed decisions as final decisions upends the stepwise fashion necessary for the wise, informed administration of public lands. 4130.2 (f) The authorized officer will not offer, grant or renew grazing permits or leases when the applicants, including permittees or lessees seeking renewal, refuse to accept the proposed terms and conditions of a permit or lease. Instead, NMDA requests that the regulation above be updated to include BLM's consultation, cooperation, and coordination with the affected lessee or permittee if he/she refuses to accept the proposed terms and conditions, as well as with the State having lands or responsible for managing resources within the area. Additionally, NMDA requests that the regulation be updated to include an appeals process for the applicant if he/she refuses to accept the proposed terms and conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Glebs	JOHN		MO	448	1	Subpart 4130 - Authorizing Grazing Use	Allow for grazing permit retirement and long-term non-use for conservation purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	23	Subpart 4130 - Authorizing Grazing Use	After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed," "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing does not reduce or otherwise affect the existing permitted use of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	22	Subpart 4130 - Authorizing Grazing Use	Adjudicated AUM's in active use that could be canceled under this part are still in the carrying capacity of the allotment and they should become available to other qualified applicants to purchase from the BLM. This part of the Regulations should not be used to lower the amount of money received by the BLM for AUM's that, while no longer available to the permittee from whom they were canceled, remain a part of the carrying capacity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	45	Subpart 4130 - Authorizing Grazing Use	Add a new subsection: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	21	Subpart 4130 - Authorizing Grazing Use	Across the west, permittees/lessees own or control a lot of land that is not located in his/her allotment. Allotment boundaries were established not to accommodate ownership patterns but to help improve opportunities for grazing systems and management of the land. Allotments were established to accommodate improvements in livestock grazing desired by the public, the State Game and Fish Departments, the BLM, and ranchers. Under current regulations, no exchange of use is allowed for those lands unless those lands are now within the allotment of the permittee/lessee. This regulation effectively reduces the number of livestock AUM's the BLM could authorize in the allotment. The effect of this is an administrative/Regulatory cut to the current permittees/lessees without the opportunity for appeal by the current permittee. The permittee/lessee loses income and the BLM loses the opportunity to include these intermingled ownerships in the grazing program. Wildlife sometimes are adversely impacted when theses intermingled lands are fenced in ways to preclude safe access. These intermingled private or State lands often contain water not available on the Federal land portions in the allotment so additional range improvements on the Federal portions are necessary for the proper management of these areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	8	Subpart 4130 - Authorizing Grazing Use	4130.6-3 - Crossing Permits Rationale Crossing permits need to respond to severe weather, road closures and other changing conditions. Crossing permits should be an administrative decision without protest procedures and proposed decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	7	Subpart 4130 - Authorizing Grazing Use	4130.6-2 - Nonrenewable Grazing Permits and Leases Rationale Authorized officer should be able to make these decisions administratively after consultation with permittee and state and local governments to quickly address resource concerns including vegetation treatments and targeted grazing opportunities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	31	Subpart 4130 - Authorizing Grazing Use	4130.6: Other grazing authorizations: The WSGB requests that a paragraph be added to this Section to say, " The AO does not have the authority to convert Federal lands within a dedicated stock driveway into a BLM allotment, and the AO is authorized to rescind and/or amend a LUP for any action taken by an AO to do this in the past.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	56	Subpart 4130 - Authorizing Grazing Use	<p>§ 4130.6-3 Crossing permits. A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public land or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. [60 FR 9967, Feb. 22, 1995] OLD TEXT, COMMENTER RECOMMENDS DELETING "§4130.6-4 Special grazing permits or leases.": Special grazing permits or leases authorizing grazing use by privately owned or controlled indigenous animals may be issued at the discretion of the authorized officer. This use shall be consistent with multiple-use objectives. These permits or leases shall be issued for a term deemed appropriate by the authorized officer not to exceed 10 years. RATIONALE: Comment: Why is the BLM allowing grazing of 'indigenous animals? The Taylor Grazing Act of 1934 specifically speaks to authorizing permits to 'graze livestock', not indigenous animals. Indigenous animals are not 'livestock'.</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329	19	Subpart 4130 - Authorizing Grazing Use	<p>§ 4130.1 Applications. § 4130.1-1 Filing applications. Applications for grazing permits or leases (active use and nonuse), free-use grazing permits and other grazing authorizations shall be filed with the authorized officer at the local Bureau of Land Management office having jurisdiction over the public lands involved. [43 FR 29067, July 5, 1978, as amended at 49 FR 6453, Feb. 21, 1984. Redesignated at 60 FR 9965, Feb. 22, 1995] § 4130.1-2 Conflicting applications. When more than one qualified applicant applies for livestock grazing use of the same public lands and/or where additional forage for livestock or additional acreage becomes available, the authorized officer may authorize grazing use of such land or forage on the basis of § 4110.3-1 of this title or on the basis of any of the following factors: (a) Historical use of the public lands (see § 4130.2(e)); (b) Proper use of rangeland resources; (c) General needs of the applicant's livestock operations; (d) Public ingress or egress across privately owned or controlled land to public lands; (e) Topography; (f) Other land use requirements unique to the situation. (g) Demonstrated stewardship by the applicant to improve or maintain and protect the rangeland ecosystem; and (h) The applicant's and affiliate's history of compliance with the terms and conditions of grazing permits and leases of the Bureau of Land Management and any other Federal or State agency, including any record of suspensions or cancellations of grazing use for violations of terms and conditions of agency grazing rules. [49 FR 6453, Feb. 21, 1984; 49 FR 12704, Mar. 30, 1984, as amended at 53 FR 10234, Mar. 29, 1988; 60 FR 9965, Feb. 22, 1995; 61 FR 4227, Feb. 5,1996] § 4130.2 Grazing permits or leases. (a) Grazing permits or leases shall be issued to qualified applicants to authorize use on the public lands and other lands under the administration of the Bureau of Land Management that are designated as available for livestock grazing through land use plans. Permits or leases shall specify the types and levels of use authorized, including livestock grazing, suspended use, and conservation use. These grazing permits and leases shall also specify terms and conditions pursuant to §§ 4130.3, 4130.3-1, and 4130.3-2. (b) The authorized officer shall consult, cooperate and coordinate with affected permittees or lessees, the State having lands or responsible for managing resources within the area, and the interested public prior to the issuance or renewal of grazing permits and leases. (c) Grazing permits or leases convey no right, title, or interest held by the United States in any lands or resources. (d) The term of grazing permits or leases authorizing livestock grazing on the public lands and other lands under the administration of the Bureau of Land Management shall be 10 years unless (1) The land is being considered for disposal; (2) The land will be devoted to a public purpose which precludes</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	14	Subpart 4130 - Authorizing Grazing Use	* Edit § 4130.3-2 to read: "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds. (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire. (5) Targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gammett	Glenda		OR	1382	8	Subpart 4130 - Authorizing Grazing Use	"The authorized officer shall speck the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount offlexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data. "
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	51	Subpart 4130 - Authorizing Grazing Use	"§ 4130.7 Ownership and identification of livestock. (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives a permittee or lessee control of the livestock by another individual or business shall be filed with reviewed by the authorized officer for approval prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. The authorized officer shall file a statement in the permit or lease file that 'the livestock control agreement has been reviewed and approved."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	42	Subpart 4130 - Authorizing Grazing Use	"§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; or (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds and/or annual grasses.; or (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire; or (5) The primary purpose of grazing use is targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	DeBolt	Ann		ID	724	1	Subpart 4130 - Authorizing Grazing Use	Within the Grazing Regulation modifications, I urge you to allow for grazing permit retirement and long-term non-use for conservation purposes. This would better ensure that grazing management, or the lack thereof, preserves habitat values for native plants and wildlife species, and maintains and improves wilderness characteristics and other special values.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	8	Subpart 4130 - Authorizing Grazing Use	Wildfire has increased in frequency and intensity. It is the most damaging factor to habitat values and forage production. The regulations should support responsible use of livestock grazing a s tool for fine-fuel reduction. The following changes will facilitate better use of free-use grazing permits and targeted grazing. Delete from 43 CFR 4131.3-1: "Permits and leases shall incorporate terms and conditions that ensure conformance withsubpart 4180 of this part.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Robinson	John	Idaho Conservation League	ID	1341	9	Subpart 4130 - Authorizing Grazing Use	While there may be some currently ungrazed areas that are suitable to responsible livestock grazing, there are likely some currently grazed areas that are not well-suited for continued livestock grazing due to sensitive resources, non-compatible uses or other factors. The BLM should examine these areas for grazing reductions or temporary closures or permanent retirements. Permits should also be made available for retirement on a willing seller willing buyer basis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	21	Subpart 4130 - Authorizing Grazing Use	When there are conflicting applications for livestock grazing use, the current regulations allow the AD to consider whether an applicant allows "public ingress or egress across privately owned or controlled land to public lands." 43 C.F.R. § 4110.1-2(d). An applicant who does not allow public access across their own private land should not be penalized for not providing the general public access over its private land. Allowing public access across private land should not be a criterion for obtaining approval of an application for grazing use. Therefore, the DCA recommends deletion of 43 C.F.R. § 4110.1-2(d) which provides as a factor "public ingress or egress across privately owned or controlled land to public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	21	Subpart 4130 - Authorizing Grazing Use	We recommend that clearly spelled out language be included to insure that consultation and coordination takes place with existing permittees, lessees and any owners of private lands which will be involved in the "crossing". With that preliminary provision covered, the additional language should be amended to the existing regulation for 4130.6-3... ORIGINAL [NOT 2006/unknown origin] TEXT "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. COMMENTER'S SUGGESTED NEW TEXT "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing is within the existing carrying capacity of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	29	Subpart 4130 - Authorizing Grazing Use	We reattach that petition here as a basis for the agency's consideration in modifying the fee formula towards a fair, market-based value in this rule-making revision process. Appendix G, Grazing Fee Petition from 2005.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Vonda		NM	899		2 Subpart 4130 - Authorizing Grazing Use	We live in an area dominated by oil extraction. When an oil well location is permitted, we are not consulted on whether or not such location is removing an essential part of our grasslands and we receive no monetary compensation, even though we are the surface owners and the ones who are most affected. We lose vital forage for livestock and wildlife alike. Allotment owners must be included in the decision making process when related to grazing on their allotments and including, but not limited to, exchanges-of-use carrying capacity, crossing permits, designated recreation areas, mining, and mineral extraction. Current regulations disregard meaningful consultation, cooperation, and coordination with allotment owners and lessees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cockrell	Will & Debra		CA	1017		6 Subpart 4130 - Authorizing Grazing Use	-There should be No trailing permits required when a permittee is moving livestock on their own allotment. Often times, livestock must be trailed across an allotment or pasture in an allotment in order to reach other pastures or other areas like high country with in their own allotment.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204		54 Subpart 4130 - Authorizing Grazing Use	The regulatory language for temporary nonrenewable permits should be modified to assure that nonrenewable grazing permits or leases will not be detrimental to fish and wildlife and will not exceed the livestock carrying capacity and 30% utilization rate. The additional language assures compliance with 43 U.S.C. 1701(a)(7) and (8). Full participation by the public in any proposals to issue these permits should continue and not be eliminated or minimized in order to "improve permitting efficiency."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820		8 Subpart 4130 - Authorizing Grazing Use	The regulations should revise the provisions regarding Exchange of Use Agreements to clarify that Exchange of Use will be linked to the respective state law regarding "fence out" and "open range." This issue is primarily focused on railroad "checkerboard" where ownership of the various parcels issue complicated and involve many different landowners. The current regulations seem to support that unfenced private lands in these areas are not available to grazing permittees without a signed lease or court order. We are convinced that Nevada law, including case law and Attorney General opinions, have consistently held that Nevada, as a "fence out" state, grants permission to grazing "livestock running at large on the ranges or commons" (NRS 568.300) of unfenced private lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820		9 Subpart 4130 - Authorizing Grazing Use	The regulations should clarify the trailing/crossing permits process. In some circumstances, ranchers have to cross neighbor's allotments in which they do not have a term grazing permit. In most of these cases, private-party agreements have been the norm. However, we do understand that in some cases conflict surrounding the crossing of private property may crop up. For only cases in which a conflict between neighbors has come up, a trailing permit outlining the obligations of the trailing rancher may be warranted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Van Hyning	Dyrck		MT	1376		1 Subpart 4130 - Authorizing Grazing Use	The number one regulation the new Grazing Regulation must address is livestock carrying capacity.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	28	Subpart 4130 - Authorizing Grazing Use	The exchange-of-use concept allows the BLM to enter an agreement with a livestock operator to exchange the use of forage on private land for grazing on public lands. Often, BLM is required to address questions regarding the scope of the area where exchange-of-use agreements will be permitted. These queries are often related to whether the agreement will be limited to only private lands within an allotment, or more broadly available for other lands outside an allotment. The OCA believes that limiting exchange-of-use agreements to only private lands within an allotment is too narrow and reduces livestock use on BLM lands across the west. We recommend revising the exchange-of-use regulation as follows: "§ 4130.6-1 Exchange-of-use grazing agreements. (a) An exchange-of-use grazing agreement may be issued to an applicant wha owns or controls lands that are unfenced and intermingled with public lands iRtRe59FRe911etFReRt when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including foir and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use. "
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	12	Subpart 4130 - Authorizing Grazing Use	The 2006 Rule, 71 Fed. Reg. 39402 (July 12, 2006), eliminated that provision, id. at 39404, but the 2006 rule was permanently enjoined by the District of Idaho, and thus the 1995 Rule is being used and it retains the invalid conservation use provision. Western Watersheds Project v. Kraayenbrink, 632 F.3d 472, 480 (9th Cir. 2011). The Proposed Rule, therefore, should remove the conservation use provision pursuant to Public Lands Council v. Babbitt and, further, ensure that the basic purpose of the TGA, FLPMA, and PRIA are reflected in Proposed Rule.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kershner	Bryce		OR	1048	2	Subpart 4130 - Authorizing Grazing Use	Temporary non-renewable should be at the discretion of the field office manager as a tool to manage for grazing to utilize feed, assist in fuel load reduction, and maintain healthy rangelands. Season of use should be expanded on permits to allow managers and permittees to make decisions based on the range, annual conditions, benefits to the range, etc. i.e. if a permit has a season of use written in from March 1 to February 28 it is a tool that can be used to make good decisions on the allotment. AUMs and permit terms and conditions restrict this being an annual permit, but the dates allow decisions to be made based on the forage, range conditions and such for that particular year allowing for better management.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	24	Subpart 4130 - Authorizing Grazing Use	Targeted Grazing for Fuel Reduction: Why is the goal to maintain fine fuels reduction with grazing up to the start of the fire season? That statement suggests that once the fire season starts (for which the specific conditions are not defined) targeted grazing ends. Fuels issues are a 12- month problem and need 12-month solutions. There is no reason that grazing cannot occur on fuel breaks or areas adjacent to them during the fire season. In many areas, high fire danger can last into early winter. When plants become dormant in summer and remain so in the fall and early winter, the dormant growth stage provides an opportunity for grazing to remove residual fuels that will carry over to the next year. Yet, one is still in the current fire season, and the language provided in the Fact Sheets would preclude grazing during this period. Grazing in the spring, when the plans are actively growing, but typically before the fire season starts, may be the most detrimental period to graze, especially if the grazing occurs year after year with intensities greater than 50%. The grazing management literature is replete with research that concludes repeated use during the boot stage is when grazing is most detrimental to bunchgrasses. The language used is critical as inaccurate or improper language ultimately creates legal constraints.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	10	Subpart 4130 - Authorizing Grazing Use	Subpart 4130.6-3 Crossing Permits We recommend clearly spelling out exemptions for crossing, or trailing. We support adding the following language: "...A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, shall be authorized under a Categorical Exclusion. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	15	Subpart 4130 - Authorizing Grazing Use	Subpart 4130.6-3 Crossing Permits We recommend clearly spelling out exemptions for crossing, or trailing. We support adding the following language: "...A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, shall be authorized under a Categorical Exclusion. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	20	Subpart 4130 - Authorizing Grazing Use	Subpart 4130.6-3 - Crossing Permits Trailing permits should not be required when a rancher is moving livestock on their own allotment. Section 4120.6-3 should be amended as follows. BLM should ensure that consultation and coordination takes place with existing permittees, lessees and any owners of private lands which will be involved in any "crossing." REVISE AS FOLLOWS: "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing is within the existing carrying capacity of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	9	Subpart 4130 - Authorizing Grazing Use	Subpart 4130.6-1 Exchange of use Grazing Agreements It is not justified to limit the exchange of forage on private land for grazing on public lands. Use the following wording (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	19	Subpart 4130 - Authorizing Grazing Use	Subpart 4130.6-1 -Exchange of use grazing agreements The regulations should be revised to clarify that Exchange of Use will be linked to the respective state law regarding "fence out" and "open range." We are concerned that the current regulations seem to imply that unfenced private lands in checker board areas, Exchange of Use is not available to grazing permittees without a signed lease or court order. Limiting exchange-of-use agreements to only private lands within an allotment is too narrow and reduces livestock use on BLM lands across the west. Section 4130.6-1 should be amended (REVISE) as follows: (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands in the same allotment when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	8	Subpart 4130 - Authorizing Grazing Use	Subpart 4130.3-2 Other Terms and Conditions Remove "(c) Authorization to use, and directions for placement of supplemental feed, including salt, for improved livestock and rangeland management on the public lands." Supplemental feed such as salt, mineral, and protein tubs are not only essential for livestock health; they are a beneficial tool in managing utilization that should not be restricted. This also needs removed from Subpart 4140 - restricted acts (3).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	7	Subpart 4130 - Authorizing Grazing Use	Subpart 4130.3-1 Mandatory Terms and Conditions Agency decisions must be based on, documented, site specific, science-based reason. Add the following wording... (a) "...The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	18	Subpart 4130 - Authorizing Grazing Use	Subpart 4130.3-1 - Mandatory terms and conditions Farm Bureau policy stresses that agency decisions have as a basis, documented specific, proven science-based reasons for decisions made and actions taken. Section 4130.3-1 "Mandatory terms and conditions" should be modified as follows: (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	25	Subpart 4130 - Authorizing Grazing Use	Strike subsection (e): (e) The kinds of indigenous animals authorized to graze under specific terms and conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ziemann	Lois		CO	644	4	Subpart 4130 - Authorizing Grazing Use	Set a fair and equitable grazing fee based on comparable private land prices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	20	Subpart 4130 - Authorizing Grazing Use	Section 4130.4(b) " may apply for the use of forage that is temporarily available on designated ephemeral or annual ranges." This description/condition does not fit what is common on much of the Great Basin and Intermountain West: mixed annual grass/bunchgrass communities. Often there are enough bunchgrasses present to preclude many managers from calling it an annual grass community. During wet years, the annual grasses are very productive and can obscure much of the perennial grass component (especially Sandberg's bluegrass and Squirreltail), but in drier years, the annual grasses are few and the site has the appearance of a perennial grass site. The mixed nature of grass lifeforms on these rangelands needs to be recognized and both lifeforms managed for (discussed previously). Annual grasses need to managed with appropriate grazing (dormant season often is best) when they are present and they need to be recognized as forage. Annual grasses should not be used to calculate base AUMs available on mixed grass allotments, but they are forage when present and must be properly managed for, including the use of livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	19	Subpart 4130 - Authorizing Grazing Use	Section 4130.3-3 "the authorized officer may modify terms and conditions of the permit or lease when the active use or related management practices are not meeting the land use plan, allotment management plan or other activity plan or management objectives" Philosophically I do not disagree with this statement, but it has the potential for rampant abuse because there is no time frame required for actions to occur and potentially achieve their intended outcomes. It may take 5 or 10 years, or more before intended outcomes begin to materialize, yet an authorized officer can decide at any time that plans are not being met. Many systems change slowly due to their environment and change when specific environmental pulses occur. Management actions must be provided ample time to capture these pulses. As written, this section does not address those pulses and the time needed for management actions to capture them.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	18	Subpart 4130 - Authorizing Grazing Use	Section 4130.3-1 (a): I reiterate previous comments that many of these values should change as the stage of vegetation growth changes. The effect of grazing on plants is not the same throughout the year, and those effects must be considered when planning how to use livestock as a management tool (i.e., targeted or outcome-based grazing) to achieve specific outcomes.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Rosemary			1194	8	Subpart 4130 - Authorizing Grazing Use	Section 4130.3 Specified terms and conditions should always be made in consultation with the livestock producer to insure that the land and current conditions are properly understood.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	17	Subpart 4130 - Authorizing Grazing Use	Section 4130.2 (g): Land use plans change slowly, often very slowly, while conditions on the ground can change fast and not always in desired directions. Beneficial changes in management, particularly for grazing, may not be allowed by existing plans, yet change is often time critical. The new grazing regulations need to address the need to cope with rapidly changing bio-physical realities and make quick changes possible when the proposed change is soundly supported by relevant research, or other information and data. If rapid change is not possible time sensitive opportunities will be lost and additional rangeland deterioration will occur.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	11	Subpart 4130 - Authorizing Grazing Use	Section 4130.10 Documentation required for renewal of grazing permits and leases. REVISE WITH FOLLWING TEXT: "If the authorized officer renews a grazing permit or lease that contains less than a ten percent increase or decrease in permitted grazing use, then the decision shall be documented under the National Environmental Policy Act 1969 with a categorical exclusion."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chandler	Britney			1160	2	Subpart 4130 - Authorizing Grazing Use	Second our turn out dates need to reflect that particular year's conditions and not have to have any additional NEPA or other studies. Often by the time the evaluations are complete the situation has already changed. If there is grass left in the fall those and those seasonal grasses have already went to seed and are dead, they can no longer be damaged and we should be allowed to graze them down in order to help control the fuel load for the next year. Third temporary crossing permits need to be much easier to obtain if the weather and ground permit. It is sometimes a huge inconvenience to have to move cattle around a section because it cannot be legally crossed when there is not a valid reason.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	34	Subpart 4130 - Authorizing Grazing Use	Sec. 4130.3-1 Mandatory terms and conditions. (g) Permits and leases shall provide for the temporary modification of livestock grazing to reduce disturbance to denning and nesting wildlife. (h) Permittees and lessees must notify the BLM and state wildlife agencies as soon as practicable of any depredation on livestock or conflicts between large carnivores and livestock (i) Permits and leases shall include guidelines for and require removal and/or disposal of livestock carcasses such that the carcass will not attract carnivores or scavengers. If removal and/or disposal of the carcass is not possible due to its location, utilize other remedies that will eliminate the attractant. (j) Where predator presence is known or likely, permits and leases shall require the use of range riders, shepherds, or other forms of human presence as appropriate for the type of livestock, that are trained and equipped to prevent predator-livestock conflict using appropriate non-lethal techniques. (k) Permits and leases shall prohibit the turn out of sick or injured livestock and require the removal of sick and injured livestock to reduce the risk of attracting predators.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	20	Subpart 4130 - Authorizing Grazing Use	Revise subsection (f): (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	26	Subpart 4130 - Authorizing Grazing Use	Revise subsection (f): (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with the objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	13	Subpart 4130 - Authorizing Grazing Use	Revise 43 CFR 4130.3-2 as follows: "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; or (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds and/or annual grasses; or (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire; or (5) The primary purpose of grazing use is targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO. Delete subsection (e): "(e) The kinds of indigenous animals authorized to graze under specific terms and conditions" Revise subsection (f): "(f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; Add a new subsection: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	18	Subpart 4130 - Authorizing Grazing Use	Revise 43 CFR 4130.3-2 as follows: "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; or (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds and/or annual grasses; or (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire; or (5) The primary purpose of grazing use is targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	36	Subpart 4130 - Authorizing Grazing Use	Retired grazing permits. Several recent laws have authorized the BLM to retire permanently grazing permits or leases if voluntarily donated by the permittee or lessee.[13: e.g., see Sec. 1402 of Public Law 111-11, Sec. 122(b) of Public Law 112-74, Sec. 122(b) of P.L. 112-74, and Sec. 102(e)(2) of the Sawtooth National Recreation Area and Jerry Peak Wilderness Additions Act.] The grazing regulations should recognize this innovation and ensure that the BLM tracks the permanently retired permits or leases and their associated allotments. Absent an institutionalized tracking system, it is possible that the information will get lost and the BLM will inadvertently (and illegally) make the allotments available for public lands grazing. The revised regulations therefore should require corporate tracking of the permanently retired grazing permits and leases and the associated allotments, and that the tracking information be publicly available, posted online, and reflected in resource management plans.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Rankin		NM	1179	8	Subpart 4130 - Authorizing Grazing Use	Remove Section 4130.3-2(e). This section has no place to be included in an allotment owner's terms and conditions. We do not have control over the kind or number of indigenous animals which may be located on their allotment.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Rankin		NM	1179	7	Subpart 4130 - Authorizing Grazing Use	Remove Section 4130.3-2(d). If an allotment owner has paid the full preference, it is irrelevant the "actual use made" so long as the livestock numbers do not exceed the allocated number.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Vonda		NM	899	6	Subpart 4130 - Authorizing Grazing Use	Remove Section 4130.3-2(a) and Section 4130.3-2(b). BLM does not have the statutory authority to dictate to an allotment owner what particular class or breed of livestock they choose to raise. Remove Section 4130.3-2(d). If an allotment owner has paid the full preference, it is irrelevant the “actual use made” so long as the livestock numbers do not exceed the allocated number. Remove Section 4130.3-2(e). This section has no place to be included in an allotment owner’s terms and conditions. We do not have control over the kind or number of indigenous animals which may be located on their allotment. Amend Section 4130.3-2(h). Allotment owners shall provide reasonable administrative access across private land or privately leased land to the BLM for the orderly management and protection of the public lands. Permission shall be granted on a case by case basis. It is coercion for an allotment owner to be required to sign a blanket statement if they choose not to in regards to their private property.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Rankin		NM	1179	6	Subpart 4130 - Authorizing Grazing Use	Remove Section 4130.3-2(a) and Section 4130.3-2(b). BLM does not have the statutory authority to dictate to an allotment owner what particular class or breed of livestock they choose to raise.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	11	Subpart 4130 - Authorizing Grazing Use	Regulations regarding trailing across neighboring permits or your own permit should be granted through cooperative agreement between both permittees and the 001. Trailing should be considered the best option for the transferring of cattle from allotment to allotment over hauling due to the burden it can be upon ranch and range resources. Past historical trailing should also continue to be honored. Agreements can be made to reduce any adverse effects caused by trailing over another permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davis	Tyler	Arizona Farm Bureau Federation	AZ	1122	4	Subpart 4130 - Authorizing Grazing Use	Range fires are becoming more frequent, intense, and widespread. Free use grazing permits for fuel reduction should be added to the list as a tool to reduce fuel on public land. Edit the regulation at § 4130.3-1 by striking subsection (c) as follows: TEXT IS STRICKEN: "Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part." Further edit at § 4130.3-2 as follows: "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: OLD TEXT (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; NEW TEXT (1) The primary objective of authorized grazing use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds. (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire." (5) Targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO. Further edit by striking subsection (e): TEXT IS STRICKEN: "(e) The kinds of indigenous animals authorized to graze under specific terms and conditions" Further edit at subsection (f) as follows: OLD TEXT (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; NEW TEXT (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; Further edit by the addition of a new subsection: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal." In most instances, wildfires do not burn an entire forest management unit uniformly. Accordingly, AZFB supports permit-specific analysis for grazing deferment following wildfires. When the federal government takes land out

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davis	Tyler	Arizona Farm Bureau Federation	AZ	1122	5	Subpart 4130 - Authorizing Grazing Use	Range fires are becoming more frequent, intense, and widespread. Free use grazing permits for fuel reduction should be added to the list as a tool to reduce fuel on public land. Edit the regulation at § 4130.3-1 by striking subsection (c) as follows: TEXT IS STRICKEN: "Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part." Further edit at § 4130.3-2 as follows: "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: OLD TEXT (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; NEW TEXT (1) The primary objective of authorized grazing use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds. (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire." (5) Targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO. Further edit by striking subsection (e): TEXT IS STRICKEN: "(e) The kinds of indigenous animals authorized to graze under specific terms and conditions" Further edit at subsection (f) as follows: OLD TEXT (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; NEW TEXT (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; Further edit by the addition of a new subsection: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal." In most instances, wildfires do not burn an entire forest management unit uniformly. Accordingly, AZFB supports permit-specific analysis for grazing deferment following wildfires. When the federal government takes land out
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	7	Subpart 4130 - Authorizing Grazing Use	Quantitative data should be used to determine carrying capacity. The following changes to the mandatory terms and conditions should be made: OLD TEXT "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity." NEW TEXT "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Simkins	Connie	N-4 State Grazing Board	NV	1410	3	Subpart 4130 - Authorizing Grazing Use	Prior to any reduction in AUMs, appropriate steps should be taken to ensure that it is, in fact, livestock grazing that is causing any problems on the allotment. This should include looking closely at wild horse damages, drought or flood conditions, fire impacts and any other extenuating circumstances that often put the health of the allotment at risk. Then, if any of those conditions are the source of negative allotment conditions, livestock grazing should be managed appropriately to help mitigate those impacts. The Board strongly suggests that the BLM look at livestock grazing as a tool for managers to use, instead of a scapegoat for the issues that arise on our rangelands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Grue	Clinton		MT	1049	2	Subpart 4130 - Authorizing Grazing Use	Permit transfers can be a valuable tool in times of drought to conserve resources by moving livestock to areas that have normal range conditions. They should not need a propped decision if the livestock management is not significant from the current permit. The 3 year timeframe should be retained.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carter	Jacob	Carter Cattle Co.	NV	954	3	Subpart 4130 - Authorizing Grazing Use	Permit holders should be allowed to trail across other permits than their own when it is neccesary and where it has been used traditionally. Historic trailing is essential to many operations where allotments are spread out. Agrrements between permit holders should be established to set clear rules for trailing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	13	Subpart 4130 - Authorizing Grazing Use	Passive restoration must be a primary element of any Reg revision. BLM must allow grazing permit retirement whenever it is requested. BLM must work to prioritize removal of grazing across the arid West and BLM itself must take action itself to close/retire grazing allotments to mitigate climate stress, wildlife habitat losses, water loss and other degradation and harms to public lands associated with livestock grazing. Grazing is a privilege, not a right. Permits can be canceled at any time.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	55	Subpart 4130 - Authorizing Grazing Use	<p>Original text: Applications for grazing permits or leases (active grazing use, conservation use and suspended use), annual grazing authorizations (active grazing use and temporary nonuse)Free-use grazing permits and other grazing authorizations shall be filed with the authorized officer at the local Bureau of Land Management office having jurisdiction over the public lands or other lands administered by the Bureau of Land Management. [43 FR 29067, July 5, 1978, as amended at 49 FR 6453, Feb. 21, 1984.] Proposed text: Applications for grazing permits or leases (active grazing use and suspended use), annual grazing authorizations (active grazing use and temporary nonuse)Free-use grazing permits and other grazing authorizations shall be filed with the authorized officer at the local Bureau of Land Management office having jurisdiction over the public lands or other lands administered by the Bureau of Land Management. Original text: § 4130.1-2 Conflicting applications. When more than one qualified applicant applies for livestock grazing use of the same public lands and/or where additional forage for livestock or additional acreage becomes available, the authorized officer may authorize grazing use of such land or forage on the basis of §4110.3-1 of this title or on the basis of any of the following factors: (a) Historical use of the public lands (see § 4130.2(e); (b) Proper use of rangeland resources; (c) General needs of the applicant's livestock operations; (d) Public ingress or egress across privately owned or controlled land to public lands; (e) Topography; (f) Other land use requirements unique to the situation. (g) Demonstrated stewardship by the applicant to improve or maintain and protect the rangeland ecosystem; and (h) The applicant's and affiliate's history of compliance with the terms and conditions of grazing permits and leases of the Bureau of Land Management and any other Federal or State agency, including any record of suspensions or cancellation of grazing use for violations of terms and conditions of agency grazing rules. Original text: [49 FR 6453, Feb. 21, 1984; 49 FR 12704, Mar. 30, 1984, as amended at 53 FR 10234, Mar. 29, 1988] Proposed text: delete original text above Original text: § 4130.2 Grazing permits or leases. (a) Grazing permits or leases shall be issued to qualified applicants to authorize use on the public lands and other lands under the administration of the Bureau of Land Management that are designated as available for livestock grazing through land use plans. Permits or leases shall specify the types and levels of use authorized, including livestock grazing, suspended use, and conservation use. These grazing permits or leases shall also specify terms and conditions pursuant to §§4130.3, 4130.3-1, and 4130.3-2. Original text: (b) The authorized officer shall consult and coordinate with affected permittees and lessees, the State having lands or responsible for managing resources within</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	20	Subpart 4130 - Authorizing Grazing Use	<p>OLD TEXT: § 4130.7 Ownership and identification of livestock. (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives a permittee or lessee control of the livestock by another individual or business shall be filed with the authorized officer for approval prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. COMMENTERS RECOMMENDED NEW TEXT "§ 4130.7 Ownership and identification of livestock. (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives a permittee or lessee control of the livestock by another individual or business shall be reviewed by the authorized officer for approval prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. The authorized officer shall file a statement in the permit or lease file that 'the livestock control agreement has been reviewed and approved."</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	19	Subpart 4130 - Authorizing Grazing Use	OLD TEXT: "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. COMMENTER'S NEW TEXT After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed," "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing does not reduce or otherwise affect the existing permitted use of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	70	Subpart 4130 - Authorizing Grazing Use	OLD TEXT Nonrenewable grazing permits or leases may be issued on an annual basis to qualified applicants when forage is temporarily available, provided this use is consistent with multiple use objectives and does not interfere with existing livestock operations on the public lands. The authorized officer shall consult, cooperate and coordinate with affected permittees or lessees, the State having lands or responsible for managing resources within the area, and the interested public prior to the issuance of nonrenewable grazing permits and leases. NEW TEXT (a) Nonrenewable grazing permits or leases may be issued on an annual basis to qualified applicants when forage is temporarily available, provided this use is consistent with APPLICABLE LAND USE PLAN AND ACTIVITY PLAN objectives and does not interfere with existing livestock operations on the public lands. The authorized officer shall consult, cooperate and coordinate with affected permittees or lessees, the State having lands or responsible for managing resources within the area, and the interested public prior to the issuance of nonrenewable grazing permits and leases. (b) (b) BLM may issue decisions authorizing nonrenewable grazing permits in full, force and effect under subpart 4160. RATIONALE Comment [AS39]: This is proposed because the decision making process in Subpart 4160 negates the ability of BLM to effectively and efficiently authorize TNR since it takes time for BLM to process a TNR application and since, under the existing rules, a grazing decision is not effective for 30 days after issuance (which can then be delayed for another 45days should a stay petition be filed).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	50	Subpart 4130 - Authorizing Grazing Use	OLD TEXT Following consultation, cooperation, and coordination with the affected les-sees or permittees, the State having lands or responsible for managing re-sources within the area, and the inter-ested public, the authorized officer may modify terms and conditions of the permit or lease when the active use or related management practices are not meeting the land use plan, allot-ment management plan or other activ-ity plan, or management objectives, or is not in conformance with the provi-sions of subpart 4180 of this part. To the extent practical, the authorized of-ficer shall provide to affected permit-tees or lessees, States having lands or responsibility for managing resources within the affected area, and the inter-ested public an opportunity to review, comment and give input during the preparation of reports that evaluate monitoring and other data that are used as a basis for making decisions to increase or decrease grazing use, or to change the terms and conditions of a permit or lease. NEW TEXT Following consultation, cooperation, and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, , the authorized officer may modify terms and conditions of the permit or lease when the active use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, . To the extent practical, the authorized officer shall provide to affected permittees or lessees, States having lands or responsibility for managing resources within the affected area, an opportunity to review, comment and give input during the preparation of reports that evaluate monitoring data that are used as a basis for making decisions to increase or decrease grazing use, or to change the terms and conditions of a permit or lease. RATIONALE The unregulated "interested public" uses have zero responsibility for management and are often bias or agenda driven, their only involvement in modification of permits or leases should be in the NEPA process. Interested public have an opportunity to provide opinion and if determined worthy of further consideration, will be considered in the decision process. "evaluate monitoring and other data that are used as a basis for making decisions", data used as a basis for making decisions should be held to the highest standards because these decisions affect people's livelihoods, families, neighbors and cultures.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	72	Subpart 4130 - Authorizing Grazing Use	OLD TEXT A service charge may be assessed for each crossing permit, transfer of grazing preference, application solely for nonuse or conservation use, and each replacement or supplemental billing notice except for actions initiated by the authorized officer. Pursuant to section 304(a) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1734(a)), calculation of the Bureau service charge assessed shall reflect processing costs and shall be adjusted periodically as costs change. Notice of changes shall be published periodically in the FEDERAL REGISTER. NEW TEXT A service charge may be assessed for each crossing permit, transfer of grazing preference, application solely for nonuse _____, and each replacement or supplemental billing notice except for actions initiated by the authorized officer. Pursuant to section 304(a) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1734(a)), calculation of the Bureau service charge assessed shall reflect processing costs and shall be adjusted periodically as costs change. Notice of changes shall be published periodically in the FEDERAL REGISTER.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	51	Subpart 4130 - Authorizing Grazing Use	OLD TEXT A service charge may be assessed for each crossing permit, transfer of grazing preference, application solely for nonuse , and each replacement or supplemental billing notice except for actions initiated by the authorized officer. Pursuant to section 304(a) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1734(a)), calculation of the Bureau service charge assessed shall reflect processing costs and shall be adjusted periodically as costs change. Notice of changes shall be published periodically in the Federal Register. NEW TEXT A service charge may be assessed for each crossing permit, transfer of grazing preference, application solely for nonuse or conservation use, and each replacement or supplemental billing notice except for actions initiated by the authorized officer. Pursuant to section 304(a) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1734(a)), calculation of the Bureau service charge assessed shall reflect processing costs and shall be adjusted periodically as costs change. Notice of changes shall be published periodically in the Federal Register.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	71	Subpart 4130 - Authorizing Grazing Use	OLD TEXT § 4130.6-3 Crossing permits. A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public land or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. NEW TEXT § 4130.6-3 Crossing permits. A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public land or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. RATIONALE Comment [AS40]: This rule should be modified to conform to the crossing permit amendments to FLPMA on December 19, 2014, 128 Stat. 3762. See Federal Land Policy and Management Act, 43 U.S.C. 1752(h)(2).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	41	Subpart 4130 - Authorizing Grazing Use	OLD TEXT § 4130.2 Grazing permits or leases. (a) Grazing permits or leases shall be issued to qualified applicants to authorize use on the public lands and other lands under the administration of the Bureau of Land Management that are designated as available for livestock grazing through land use plans. Permits or leases shall specify the types and levels of use authorized, including livestock grazing, suspended use, and conservation use. These grazing permits and leases shall also specify terms and conditions pursuant to §§ 4130.3, 4130.3-1, and 4130.3 2. (b) The authorized officer shall consult, cooperate and coordinate with affected permittees or lessees, the State having lands or responsible for managing resources within the area, and the interested public prior to the issuance or renewal of grazing permits and leases. NEW TEXT § 4130.2 Grazing permits or leases. (a) Grazing permits or leases shall be issued to qualified applicants to authorize use on the public lands and other lands under the administration of the Bureau of Land Management that are designated as available for livestock grazing through land use plans. Permits or leases shall specify the types and levels of use authorized, including livestock grazing, suspended use. These grazing permits and leases shall also specify terms and conditions pursuant to §§ 4130.3, 4130.3-1, and 4130.3 2. (b) The authorized officer shall consult, cooperate and coordinate with affected permittees or lessees, the State having lands or responsible for managing resources within the area, prior to the issuance or renewal of grazing permits and leases.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	49	Subpart 4130 - Authorizing Grazing Use	OLD TEXT (h) A statement disclosing the re-quirement that permittees or lessees shall provide reasonable administra-tive access across private and leased lands to the Bureau of Land Manage-ment for the orderly management and protection of the public lands. NEW TEXT (h) A statement disclosing the requirement with the that permittees or lessees shall provide to allow the reasonable administrative access across private and leased lands to the Bureau of Land Management for the orderly management, monitoring, and protection of the public lands. RATIONALE Forcing access to private property by threatening cancelation of a permit under the terms and conditions appears very adversarial. It is no wonder the agency is not trusted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	57	Subpart 4130 - Authorizing Grazing Use	OLD TEXT (d) Public ingress or egress across privately owned or controlled land to public lands; NEW TEXT _____. RATIONALE Comment [AS31]: The rules should be amended to remove this as a factor, considering there may be a wide range of reasons (including confidential reasons) why an applicant could or could not allow public ingress or egress across privately owned or controlled lands to public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	69	Subpart 4130 - Authorizing Grazing Use	OLD TEXT (b) An exchange fuse grazing agreement may be issued to authorize use of public lands to the extent of the livestock carrying capacity of the lands offered in exchange fuse. No fee shall be charged for this grazing use. NEW TEXT (b) An exchange fuse grazing agreement may be issued to authorize use of public lands to the extent of the ____ carrying capacity FOR LIVESTOCK of the lands offered in exchange fuse. No fee shall be charged for this grazing use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	13	Subpart 4130 - Authorizing Grazing Use	OLD TEXT "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity COMMENTER'S RECOMMENDED TEXT (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	42	Subpart 4130 - Authorizing Grazing Use	OCA further suggests adding a new section establishing that permit renewals which do not increase or decrease permitted grazing use by more than ten percent are categorically excluded under NEPA: "§ 4130.10 Documentation required for renewal of grazing permits and leases. If the authorized officer renews a grazing permit or lease that contains less than a ten percent increase or decrease in permitted grazing use, then the decision shall be documented under the National Environmental Policy Act 1969 with a categorical exclusion
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris	Ninety-Six Ranch LLC		1285	4	Subpart 4130 - Authorizing Grazing Use	NON RENEWABLE PERMITS AND LEASES - Every grazing permit should have these provision built in so that the authorizing officer can act to address conditions on the ground. This is exactly the focus and purpose of President Trump's December 2018 executive order. Unless local land use managers can act to proactively treat conditions on the ground and work in real time on cooperative solutions to fuel/water/use issues, we will never get ahead of the fire danger that remains in the west.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	11	Subpart 4130 - Authorizing Grazing Use	No trailing permit should be required when a rancher is moving livestock on their own allotment regardless of whether trailing is occurring during permitted use dates or not. Often times, livestock must be trailed across an allotment or pasture in an allotment in order to reach other pastures. In these circumstances, the alternative is to gather livestock in a concentrated manner to a central location where water often needs to be available, load them onto multiple trucks, haul them to another centralized location, and unload them in a concentrated manner. The localized impacts of this alternative are much higher than dispersed, incidental trailing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Christian	Sara		WY	1290	1	Subpart 4130 - Authorizing Grazing Use	My main comment is to make it more efficient for ranchers to obtain permits to make improvements on their land. Cross-fences and water improvements help prevent overgrazing on the land. It makes it difficult for ranchers when we have to wait up to seven years for these improvements to be approved. By improving the efficiency of the approval process, we will be able to better graze and improve our land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Otley	Susan		OR	1486	3	Subpart 4130 - Authorizing Grazing Use	Livestock being trailed should not need a Crossing Permit or any other paperwork to go across public land. Because this is an event that is done in a few hours and with the livestock on the move there is little vegetation or other disturbances.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doverspike	Mark		OR	994	2	Subpart 4130 - Authorizing Grazing Use	LEASE OR PERMIT TERMS SHOULD BE LONGER THAN 10 YEARS, (4130.2) because the funding and manpower to update the permits is limited. If the terms were 15 or 20 years then it wouldn't take as much money, manpower and time to keep permits legal and uncontested in court by the environmental community.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	20	Subpart 4130 - Authorizing Grazing Use	In the event that adverse range conditions-where the grazing of domestic livestock has been determined to be the causal factor pursuant to the recommended definition of "meeting land health standards"-lead to the nonrenewal of a term grazing permit, such action must not affect the permit-holder's underlying preference position. Therefore, the OCA recommends revising as follows: At § 4130.1-1(b)(1), insert the following: (1) Renewal of permit or lease. (i) The authorized officer will deem the applicant for renewal of a grazing permit or lease, and any affiliate, to have a satisfactory record of performance if the authorized officer determines the applicant and affiliates to be in substantial compliance with the terms and conditions of the existing Federal grazing permit or lease for which renewal is sought, and with the rules and regulations applicable to the permit or lease. Any determination must be based upon previous adjudicated claims of non-compliance or upon claims of noncompliance that would be subject to adjudication either before or Simultaneously with making the determination. Any adverse determination that results in the non-renewal of the expiring grazing permit only results in the nonrenewal of the Grazing Permit. and not the cancellation of the Grazing Preference and associated Permitted Use which shall remain attached to the base property and be available through application and transfer procedures at 43 C.F.R. § 4110.2-3 to the owner or controller of the base property that can qualify for a grazing permit. Any cancellation of Preference and Permitted Use shall only occur as part of Subpart 4170 of this title.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	12	Subpart 4130 - Authorizing Grazing Use	In the 1995 regulations, the Secretary of Interior authorized the issuance of grazing permits or leases for "livestock grazing, suspended use, and conservation use." 43 C.F.R. § 4130.2(a) (1995) (emphasis added). Conservation use was defined as "an activity, excluding livestock grazing, on all or a portion of an allotment" for conservation purposes. 43 C.F.R. § 4100.0-5 (1995). The 1995 rule allowed an individual or a group to acquire a grazing lease in order to not graze that allotment. The Tenth Circuit, in Public Lands Council v. Babbitt, 167 F.3d 1287 (10th Cir. 1999), aff'd, 529 U.S. 728 (2000), found that the TGA, the Federal Land Policy Management Act ("FLPMA"), and the Public Rangelands Improvement Act ("PRIA") authorize grazing permits "for grazing purposes only." Id. at 1308. The court noted that of course the BLM may impose temporary reduction and permittees may voluntarily decrease their numbers, but the "presumption is, however, that if and when range conditions improve and more forage becomes available, permissible grazing levels will rise." Id.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	12	Subpart 4130 - Authorizing Grazing Use	Having livestock control agreements subject to Freedom of Information Act (FOIA) disclosure discloses private financial information and serves no public purpose. The language should be revised to permit BLM to review the control agreement but not require that it be included in files subject to FOIA disclosure: OLD TEXT "§ 4130.7 Ownership and identification of livestock. (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives a permittee or lessee control of the livestock by another individual or business shall be filed with by the authorized officer for approval prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. NEW TEXT "§ 4130.7 Ownership and identification of livestock. (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives a permittee or lessee control of the livestock by another individual or business shall be reviewed by the authorized officer for approval prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. The authorized officer shall file a statement in the permit or lease file that 'the livestock control agreement has been reviewed and approved.'"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cunningham	Sean		OR	1231	7	Subpart 4130 - Authorizing Grazing Use	Grazing Committees Grazing committees need to be re-established as local, real time, boards that can make decisions on matters that relate to grazing permits.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Lone Tree Cattle Company	CA	1344	3	Subpart 4130 - Authorizing Grazing Use	Granting public access across private land should not be required to obtain approval of an application for grazing use and/or a grazing permit. The portion of 43 C.F.R. § 4110.1-2(d) which provides as a factor "public ingress or egress across privately owned or controlled land to public lands" should be deleted. 43 C.F.R. § 4130.3-1 Mandatory terms and conditions. Quantitative data should be used to determine carrying capacity. The following changes to the mandatory terms and conditions should be made: "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data." 43 C.F.R. § 4130 Free-use grazing permits. Wildfire has increased in frequency and intensity. It is the most damaging factor to habitat values and forage production. The regulations should support responsible use of livestock grazing a s tool for fine-fuel reduction. The following changes will facilitate better use of free-use grazing permits and targeted grazing. Delete from 43 CFR 4131.3-1: "Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part. Revise 43 CFR 4130.3-2 as follows: "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use _____ is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; or (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds and/or annual grasses.; or (4)The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire; or (5)The primary purpose of grazing use is targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO. Delete subsection (e): "(e) The kinds of indigenous animals authorized to graze under specific terms and conditions" Revise subsection (f): (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, _____, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; Add a new subsection: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	6	Subpart 4130 - Authorizing Grazing Use	Granting public access across private land should not be required to obtain approval of an application for grazing use and/or a grazing permit. The portion of 43 C.F.R. § 4110.1-2(d) which provides as a factor "public ingress or egress across privately owned or controlled land to public lands" should be deleted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	24	Subpart 4130 - Authorizing Grazing Use	Further, we recommend the revision and subsequent additions in § 4130.3-2 as follows: "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds and/or annual grasses. (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire." (5) Targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	32	Subpart 4130 - Authorizing Grazing Use	From 1942 until 1994, BLM's regulations required that grazing permits could only be held by those "engaged in the livestock business." The regulations codified in 1995 at 43 C.F.R. § 4110.1(a) eliminated the "engaged in the livestock business" requirement. PLC v. Babbitt, 529 U.S. at 745. As noted by the Supreme Court, the Taylor Grazing Act limits issuance of grazing permits to "settlers, residents, and other stock owners . . . ," citing 43 U.S.C. § 315(b). Id. BLM regulations should be aligned with the TGA and require, as BLM required for over half a century prior to 1994, that a permittee must be engaged in the livestock business. The change should also require that a stock owner, as defined by the statute, means not only one who simply owns livestock but one who is actively engaged in the livestock business. This change will prohibit an existing practice where individuals or entities claim to be bona fide stock owners because they own one or two cows and then apply for a permit as a means of circumventing the Tenth Circuit's invalidation of conservation use permits. These persons graze only a few head of livestock and do not utilize more than a small portion of the forage available on the allotment, knowing that the BLM likely will not suspend the permit for failure to actively use the AUMs available on the allotment. This change would support the TGA's requirement that preference should be given to "landowners engaged in the livestock business." 43 U.S.C. § 315(b). Furthermore, the Supreme Court has opined that the current regulations do not allow a person or entity holding only a few livestock to effectively mothball a permit, 529 U.S. at 747, citing the Tenth Circuit's decision prohibiting conservation use. The regulations should be modified to make the Supreme Court's opinion explicit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	32	Subpart 4130 - Authorizing Grazing Use	For all these reasons, the BLM should encourage and provide for the use of non-lethal predator control and co-existence techniques (e.g., carcass removal, range riding) in permits and leases.[12: For a discussion of coexistence strategies, see Stone 2016.]
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doverspike	Mark		OR	994	3	Subpart 4130 - Authorizing Grazing Use	FLEXIBILITY in the terms of the permits are critical because there are many conditions that flexibility is useful. It should not require additional paperwork, i.e. a CE, EA, or EIS to allow turnout times and come off times to vary. Weather can affect whether there is grass or a snowbank to turn out onto. Special specie considerations such as the sage grouse, or any other critter that gets special attention in the future, make adjusting grazing times necessary (4190.1 (viii) should be a simple matter to accomodate these needs instead of strict times on the permit. Flexibility using on the ground knowledge by the range con and the permittee in each instance would help prevent law suits. Flexibility could also be used to allow off season grazing for fire control, or times when water availabiltiy is necessary. Flexibility in all natural resource questions is logical as the land, weather, terms of use are always a fluid situation in reality if we really want to be the best stewards of the land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Adams	Chase	American Sheep Industry Assn	CO	1031	7	Subpart 4130 - Authorizing Grazing Use	Finally, ASI recommends that Advisory Councils, §4180, be removed in full from the grazing regulations. Advisory councils do not have the experience or knowledge in rangeland health to fulfill the role assigned to them.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	3	Subpart 4130 - Authorizing Grazing Use	Exchange of Use: Exchange of Use provisions in the grazing regulations should clarify that an Exchange of Use agreement and associated private grazing lease are not required for a grazing permittee in an "open range" or "fence out" state to receive credit for private forage that is available upon unfenced private land within a BLM grazing allotment. In cases where multiple permittees run in common in an allotment/grazing unit, credit for such unfenced private forage that is not secured under a private grazing lease should be apportioned to each permittee on a proportional basis commensurate with their active AUMs authorized on the public land portion of the allotment/grazing unit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	4	Subpart 4130 - Authorizing Grazing Use	Exchange of Use: Exchange of Use provisions in the grazing regulations should clarify that an Exchange of Use agreement and associated private grazing lease are not required for a grazing permittee in an "open range" or "fence out" state to receive credit for private forage that is available upon unfenced private land within a BLM grazing allotment. In cases where multiple permittees run in common in an allotment/grazing unit, credit for such unfenced private forage that is not secured under a private grazing lease should be apportioned to each permittee on a proportional basis commensurate with their active AUMs authorized on the public land portion of the allotment/grazing unit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	16	Subpart 4130 - Authorizing Grazing Use	Exchange of use grazing agreements The regulations should be revised to clarify that Exchange of Use will be linked to the respective state law regarding "fence out" and "open range." We are concerned that the current regulations seem to imply that unfenced private lands in checker-board areas, Exchange of Use is not available to grazing permittees without a signed lease or court order. Limiting exchange-of-use agreements to only private lands within an allotment is too narrow and reduces livestock use on BLM lands across the west.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	6	Subpart 4130 - Authorizing Grazing Use	Effort should be made to combine allotments of the same type, climate and environment within a permit. Multiple allotments can be combined to create several grazing pastures, allowing permittees to rotate their livestock through the season. This will allow for increased rest time and easier administrative management. Permittees covering large acreage should have the ability to have oversight by a single range specialist within a District to promote continuity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	19	Subpart 4130 - Authorizing Grazing Use	Delete subsection (e): "(e) The kinds of indigenous animals authorized to graze under specific terms and conditions"

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Pauline	Otero County Cattleman's Association		1201	12	Subpart 4130 - Authorizing Grazing Use	Delete Section 4130.3-2(a) and Section 4130.3-2(b). BLM does not have the statutory authority to dictate to a permittee/lessee a particular class or breed of livestock to graze. Delete Section 4130.3-2(d). If a permittee/lessee has paid the full preference, it is irrelevant the 'actual use made', so long as the livestock numbers do not exceed the allotted preference number. Delete Section 4130.3-2(e). Why is the BLM allowing grazing of 'indigenous animals'? The Taylor Grazing Act of 1934 specifically speaks to authorizing permits to 'graze livestock', not indigenous animals. Indigenous animals are not 'livestock'. Amend Section 4130.3-2(h) to: Permittees/lessees shall provide reasonable administrative access across private land or privately leased land to the BLM for the orderly management and protection of the public lands. Permission shall be granted on a case by case basis. It is coercion for a permittee/lessee to be required to sign blanket statement if they choose not to in regards to their private property.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stone	Gary	Otero County Cattleman's Association	NM	1201	12	Subpart 4130 - Authorizing Grazing Use	Delete Section 4130.3-2(a) and Section 4130.3-2(b). BLM does not have the statutory authority to dictate to a permittee/lessee a particular class or breed of livestock to graze. Delete Section 4130.3-2(d). If a permittee/lessee has paid the full preference, it is irrelevant the 'actual use made', so long as the livestock numbers do not exceed the allotted preference number. Delete Section 4130.3-2(e). Why is the BLM allowing grazing of 'indigenous animals'? The Taylor Grazing Act of 1934 specifically speaks to authorizing permits to 'graze livestock', not indigenous animals. Indigenous animals are not 'livestock'. Amend Section 4130.3-2(h) to: Permittees/lessees shall provide reasonable administrative access across private land or privately leased land to the BLM for the orderly management and protection of the public lands. Permission shall be granted on a case by case basis. It is coercion for a permittee/lessee to be required to sign blanket statement if they choose not to in regards to their private property.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	22	Subpart 4130 - Authorizing Grazing Use	DCA shared our desire to avoid arbitrary decision-making and require decisions to be based on quantitative data above in our proposed edit to the definition of "Monitoring" to use quantitative data. We also believe quantitative data should be used when the AD determines carrying capacity. Therefore, we propose modifying the first paragraph which discusses mandatory terms and conditions as follows: "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	7	Subpart 4130 - Authorizing Grazing Use	Currently, there is little regulatory flexibility to allow permitted grazing to go beyond the permitted date. Authority should be given to BLM managers to provide broader discretion to range specialists to make on-the-ground quick decisions to allow flexibility for ranchers. Such flexibility would result in better uses of resources. The BLM should include language in the regulations that permits adjustments to the time that producers turn animals out to graze depending on range conditions

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris			1188	3	Subpart 4130 - Authorizing Grazing Use	CROSSING PERMITS - Streamlining these kinds of regular actions makes total sense. The practice is normal and as long as permittee is notified of another crossing his permit, and all due diligence is taken so that resources (forage and water) are not overused during a crossing, these permits should be easy and readily available. If a permittee abuses a crossing permit, only that permittee, not the allotment permittee should be held accountable.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris	Ninety-Six Ranch LLC		1285	3	Subpart 4130 - Authorizing Grazing Use	CROSSING PERMITS - Streamlining these kinds of regular actions makes total sense. The practice is normal and as long as permittee is notified of another crossing his permit, and all due diligence is taken so that resources (forage and water) are not overused during a crossing, these permits should be easy and readily available. If a permittee abuses a crossing permit, only that permittee, not the allotment permittee should be held accountable.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	11	Subpart 4130 - Authorizing Grazing Use	Crossing Permits Crossing allotment permits, trailing permits are hindrances and unnecessary to trail and move to livestock. Trailing permits should not be required when a rancher is moving livestock on their own allotment. Section 4120.6-3 should be amended as follows. BLM should ensure that consultation and coordination takes place with existing permittees, lessees and any owners of private lands which will be involved in any "crossing."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eisenach	Kurt	Wyoming Wild Sheep Foundation		1161	6	Subpart 4130 - Authorizing Grazing Use	Crossing Authorizations We support efforts to expedite this effort, again while being cognizant of wild ungulates and their migration routes and patterns on the landscape. We encourage BLM to utilize the Manual Direction MS 1730 when entertaining these authorizations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eisenach	Kurt	Wyoming Wild Sheep Foundation		1161	3	Subpart 4130 - Authorizing Grazing Use	Crossing Authorizations We need further clarification on the definition of a crossing authorization (time period of when a crossing will occur and the numbers/types/class of livestock). Trailing through / crossing BLM lands may occur during big game migration periods in Spring/Fall. This may create conflicts between wildlife and livestock, putting unnecessary pressure on wildlife during potentially stressful periods (e.g. Spring periods with late snow storms) when their energy reserves are at their lowest and added stress can lead to weakened wildlife and subsequent mortalities, late term abortions, or other.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	11	Subpart 4130 - Authorizing Grazing Use	Crossing (or trailing) permits are useful tools for grazing management. Revisions in the language will improve use of the permits and better incorporate provisions passed by Congress in P.L. 113-291. 43 CFR §4130.6-3 should be modified as below: OLD TEXT § 4130.6-3 Crossing permits "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. NEW TEXT § 4130.6-3 Crossing permits After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed," "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing does not reduce or otherwise affect the existing permitted use of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National EnvironmentalPolicy Act (42 U.S.C. 4332 (2) (C))."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	29	Subpart 4130 - Authorizing Grazing Use	Crossing (or trailing) is often an essential operational activity for livestock travel to and from a permitted grazing allotment. These activities are provided for in Subpart 4130.6-3, but stronger language is needed to clarify the existing statutory authority (including provisions passed by Congress in P.L. 113-291) provided to an AO. We recommend the following language be added to §4130.6-3: § 4130.6-3 Crossing permits Add just before existing language: "After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed,"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	27	Subpart 4130 - Authorizing Grazing Use	Conservation use. The regulations should provide that a permittee or lessee can if they desire put lands under a grazing permit/lease into "conservation status" for multiple years for the purposes of protecting, maintaining, or restoring natural ecosystems and resources; preventing water quality impairment; conserving and recovering imperiled species (as defined in BLM Manual 6840, Section .01); and assuring long term sustainability. A permittee/lessee should not be forced to graze lands in need of rest and recovery, especially if doing so may impair the lands' long-term sustainability.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	16	Subpart 4130 - Authorizing Grazing Use	COMMENTER RECOMMENDS DELETION OF 4130.3-1 SUBSECTION (E): "(e) The kinds of indigenous animals authorized to graze under specific terms and conditions" 4130.31 Mandatory terms and conditions Revise subsection (f): OLD TEXT: (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the re-production, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; COMMENTER'S RECOMMENDED NEW TEXT: (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; NEW TEXT (COMMENTER RECOMMENDS ADDING NEW SUBSECTION): "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	16	Subpart 4130 - Authorizing Grazing Use	COMMENTER RECOMMENDS DELETING SUBSECTION (E) Delete subsection (e): "(e) The kinds of indigenous animals authorized to graze under specific terms and conditions"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	26	Subpart 4130 - Authorizing Grazing Use	Changes in grazing status 43 CFR 4110.3 should be changed to reflect the above: "The authorized officer shall periodically review the level of active use specified in a grazing permit/lease and may make changes to the terms and conditions as needed to accomplish allotment objectives. The AO shall first determine if livestock grazing is the causal factor for not achieving allotment objectives based on long-term rangeland monitoring trends. If the current livestock grazing program is determined to be the causal factor, the AO shall first implement changes in the management program to include, but not be limited to, changes in seasons of use, duration and timing of use, or rangeland improvements to accomplish a trend towards achieving allotment objectives before reducing active AUM's. Any reductions in active use will be placed in suspension."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bellwood	Samantha	Nevada Department of Agriculture	NV	1009	6	Subpart 4130 - Authorizing Grazing Use	-CFR 4160.1 - Proposed Decision: If there is no Protest portion of the decision -making process then the need for the Proposed Decision is either eliminated or changed to allow the permittee/lessee (and only the permittee/lessee) the ability to protest the proposed decision, all others would be notified of the Final Decision and provided the appeal process.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bellwood	Samantha	Nevada Department of Agriculture	NV	1009	5	Subpart 4130 - Authorizing Grazing Use	-CFR 4130.4 - Authorizations of Temporary Changes in Grazing Use within the Terms and Conditions of Permits and Leases, including Temporary Nonuse: NDA supports the full use of Temporary Nonuse to allow for the authorized officer the authority to make changes in grazing use within the terms and conditions. Especially needing to have the ability to make changes to the on/off dates to the grazing permit without going through the decision-making process and Protest Process, in order to adjust to the changes in environmental conditions. The Department additionally supports allowing flexibility to season off use dates providing the authority to the Authorized Officer and not having the decision go through the formal decision-making process or Protest Process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bellwood	Samantha	Nevada Department of Agriculture	NV	1009	4	Subpart 4130 - Authorizing Grazing Use	-CFR 4130.2(d) - 10-year grazing permits: "The term of grazing permits or leases authorizing livestock grazing on the public lands...shall be 10 years unless..." The department understands permits have always been on a ten-year timeline, but NDA would urge BLM to reconsider this binding timeline and increase permits from 10 to 20 years. The department is aware of very few permits actively reanalyzed and updated every ten years. In Nevada most permits are pushing 20 years with no new NEPA and with outdated Allotment Management Plans (AMPs). Increasing the length of a grazing permit allows BLM staff to focus in project and resource related projects instead of lengthily NEPA planning
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	5	Subpart 4130 - Authorizing Grazing Use	BLM's FRH review and other processes including recent TG proposals from Nevada State BLM use flawed Ecosite models, State and Transition models, and derivatives of these models based on much too short range-biased fire return and disturbance intervals and other flawed assumptions that favor predicting grass communities to benefit the livestock industry. By using much too short disturbance intervals in its modeling, BLM generates "ideal" communities with reduced amounts of trees and shrubs - maximizing grass (and also ignores crusts). These models are thus biased towards promoting "treatments".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frandsen	Fred	Washakie County Commissioners	WY	1246	3	Subpart 4130 - Authorizing Grazing Use	BLM should consider providing greater flexibility regarding how it decreases permitted use. Rather than automatically decreasing animal unit months (AUMs) when range conditions do not allow for grazing, BLM should be given the flexibility to modify management practices, such as rotation, timing and duration. Additionally, when BLM determines that a reduction in AUMs is necessary, the AUMs should be temporarily suspended, not permanently reduced.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	23	Subpart 4130 - Authorizing Grazing Use	BLM should analyze and adopt a market based grazing fee that is comparable to private land forage rental rates. See 43 U.S.C. § 1701(a)(9) ("the United States receive fair market value of the use of the public lands and their resources unless otherwise provided for by statute").
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	6	Subpart 4130 - Authorizing Grazing Use	BLM should allow more flexibility in livestock grazing use and to analyze the effects of grazing use adjustments under various circumstances and conditions specifically in instances of targeted grazing

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eisenach	Kurt	Wyoming Wild Sheep Foundation		1161	1	Subpart 4130 - Authorizing Grazing Use	Billing Proposals to consider different billing schedules should be considered to decrease administrative workload. There are BLM parcels throughout Wyoming that are small and are within / surrounded by private lands. BLM may be able to establish a minimum AUM # or acreage for consideration of a different billing schedule. On low management priority parcels and parcels that meet standards and guidelines, BLM may also consider allowing the permittee to make a multi-year payment at one time.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	9	Subpart 4130 - Authorizing Grazing Use	Before any new authority is provided in the regulations for targeted grazing, the BLM must compare and contrast this concept with the free-use permits already in existence. How many free-use permits have ever been issued? Has it worked to control noxious weeds? How much do these permits generate in revenue? How would targeted grazing permits differ? What environmental analysis accompanied free-use permits and how effective were they in disclosing past, present, and reasonably foreseeable future impacts to the affected environment? The BLM must answer all of these questions in the forthcoming EIS so that the public understands what the true "No Action" alternative is compared with any new proposals.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	37	Subpart 4130 - Authorizing Grazing Use	At 4130.6-1, Exchange of Use: The WSGB comments that language in the current regulations that restricts exchange of use permits to ONLY lands owned or controlled by the applicant within the allotment be changed to again allow lands owned or controlled outside the allotment to be offered for exchange of use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	34	Subpart 4130 - Authorizing Grazing Use	At 4130.1-2, Conflicting applications: Please take out item (d) which now says the BLM can use whether or not an applicant will allow public access across private land as a criteria for receipt of BLM AUM's. The WSGB comments that whether or not a Section 3 permittee allows access over their private lands has nothing to do with respect to qualifications for receipt of a grazing permit or additional Federal AUM's. This recommendation is also in the PLC scoping comment report.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Adams	Chase	American Sheep Industry Assn	CO	1031	6	Subpart 4130 - Authorizing Grazing Use	ASI strongly supports a revision to the crossing permits, §4130.6-3, to ensure that crossing authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the crossing or trailing does not reduce or otherwise affect the existing permitted use of the area within the crossing permit. Sheep trailing is an important activity for our membership that has little or no impact on the environment and should not elicit a burdensome regulatory process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Rankin		NM	1179	9	Subpart 4130 - Authorizing Grazing Use	Amend Section 4130.3-2(h). Allotment owners shall provide reasonable administrative access across private land or privately leased land to the BLM for the orderly management and protection of the public lands. Permission shall be granted on a case by case basis. It is coercion for an allotment owner to be required to sign a blanket statement if they choose not to in regards to their private property.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	14	Subpart 4130 - Authorizing Grazing Use	Amend Section 4130.3-2(h) to: Permittees/lessees shall provide reasonable administrative access across private land or privately leased land to the BLM for the orderly management and protection of the public lands. Permissions shall be granted on a case by case basis. It is coercion for a permittee/lessee to be required to sign blanket statement if they choose not to in regards to their private property.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Scarbrough	Gary	Otero County Public Land Use Advisory Council	NM	1202	8	Subpart 4130 - Authorizing Grazing Use	Amend Section 4130.3-2(h) to: Permittees/lessees shall provide reasonable administrative access across private land or privately leased land to the BLM for the orderly management and protection of the public lands. Permissions shall be granted on a case by case basis. It is coercion for a permittee/lessee to be required to sign blanket statement if they choose not to in regards to their private property.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	20	Subpart 4130 - Authorizing Grazing Use	Altering grazing allotments' terms and conditions for conservation use should be limited to conservation needs Conservation use should not be used to remove livestock grazing from allotments when no pressing need exists. Conservation use is important, but there should be a pertinent, documented need.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smetaniuk	Mari		NY	455	1	Subpart 4130 - Authorizing Grazing Use	Allow for grazing permit retirement and long-term non-use for conservation purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	30	Subpart 4130 - Authorizing Grazing Use	Additionally, we recommend the following changes to the existing regulations: "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing or trailing authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing does not reduce or otherwise affect the existing permitted use of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.c. 4332 (2) (C))."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	21	Subpart 4130 - Authorizing Grazing Use	Additionally, MWGAs membership urges the agency to add a new section that makes clear that permit renewals which do not increase or decrease permitted grazing use by more than 10 percent are categorically excluded under NEPA. Proposed language would read as follows: "§4130.10 Documentation required for renewal of grazing permits and leases. If the authorized officer renews a grazing permit or lease that contains less than a ten percent increase or decrease in permitted grazing use, then the decision shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion.";
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	21	Subpart 4130 - Authorizing Grazing Use	Add a new subsection: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	27	Subpart 4130 - Authorizing Grazing Use	Add a new subsection: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	6	Subpart 4130 - Authorizing Grazing Use	Action Requested Action: Include limited flexibility in season of use in the original NEPA process for an allotment permit authorization.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	23	Subpart 4130 - Authorizing Grazing Use	Across the West, range fires are becoming more frequent, intense, and widespread. We recommend that free-use grazing permits for fuel reduction be added to the list as a tool to provide a nimble tool to reduce hazardous fuels on public land. We recommend revising the regulation at § 4130.3-1 by striking subsection (c) as follows: Permits and leases shall incorporate terms and conditions that ensure performance with subpart 4180 of this part.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	16	Subpart 4130 - Authorizing Grazing Use	According to 43 C.F.R. §4130.3-2, a grazing permit may include "[a]uthorization to use, and directions for placement of supplemental feed, including salt, for improved livestock and rangeland management on the public lands." See also BLM Handbook 4130-1 Authorizing Grazing Use at 20 ("Permittees or lessees may place supplemental feed on the public lands unless they are prohibited from doing so."). BLM guidance also distinguishes: (1) supplemental; (2) maintenance; and (3) emergency feeding. Handbook 4130-1 at 20. The current rules do not define maintenance or emergency feeding and provide no direction other than "including salt" to define supplemental feed. See 43 C.F.R. §4130.3-2; 43 C.F.R. §4100.0-5; see also Handbook 4130-1 at 20. Under the Handbook, supplemental feed and emergency feeding are allowed on BLM lands while maintenance feeding is "not accepted on the public lands." Handbook 4130-1 at 20. Maintenance feeding provides "feed to supplement the forage in meeting the dry matter requirement for adequate livestock beyond the period of emergency feeding." Id. (Emphasis added). Supplemental feed, on the other hand, supplements the forage available to "improve livestock nutrition or rangeland management." 43 C.F.R. §4100.0-5; see 52 Fed. Reg. 19032, 19037 (May 20, 1987) (preamble to proposed rule, providing that supplemental feeding "is used when adequate native vegetation is available for roughage requirements of animals but lacking in protein or mineral content necessary for milk production or other animal needs" (emphasis added)); see also 53 Fed. Reg. 10224, 10231 (March 29, 1988) ("vitamin, mineral, and protein deficiencies."). Thus, even if livestock have the dry matter requirement, they may not have nutritional requirements available. BLM employees often confuse the two terms and often claims supplemental feeding is not allowed. For example, one field office in Northwest Colorado attempted to argue that alfalfa feeding was not permitted supplemental feed, but maintenance feed, when BLM Handbook 4130 provided that "[s]alt, minerals, vitamins, protein blocks and cubes, and high quality alfalfa hay are examples of supplements." BLM Handbook 4130 at 20 (continuing that "[t]he use of high quality alfalfa is considered an acceptable supplement."). The Proposed Rule should adopt the definitions of supplemental feed and maintenance feed in the handbook to improve application of the concepts in practice.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lally	Meghan	Salisbury Livestock Company		1119	7	Subpart 4130 - Authorizing Grazing Use	A portion of grazing fees is supposed to go to range improvements. Currently that money is not being spent on on the ground range improvements. That needs to change. That money is to be used to allow for improvements to the range and range conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	31	Subpart 4130 - Authorizing Grazing Use	A part of this regulation addresses the situation where a permittee or lessee controls, but does not own, the livestock that graze on public lands and requires that the agreement giving "control" be filed with reviewed by the AO before any grazing use is approved. These livestock control agreements between two private parties are subject to Freedom of Information Act (FOIA) disclosure but often contain private financial and proprietary information that would otherwise exist outside Federal and state disclosure requirements. The regulation should be amended to permit BLM to review the control agreement but not require that it be filed with the AO and subject to FOIA disclosure. We suggest amending the provision to recognize modern privacy expectations in the regulation as follows: "§ 4130.7 Ownership and identification of livestock. (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives a permittee or lessee control of the livestock by another individual or business shall be filed with reviewed by the authorized officer for approval prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. The authorized officer shall file a statement in the permit or lease file that 'the livestock control agreement has been reviewed and approved.'"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	19	Subpart 4130 - Authorizing Grazing Use	43 CFR § 4130.6-3 Crossing Permits The Federal Register notice requests input on how the BLM issues decisions for crossing permits. Crossing can be an essential operational activity. While we believe some language exists in regulation, we also believe that stronger language is needed to clarify the existing statutory authority provided to an Authorized Officer. We recommend that § 4130.6-3 be amended to add the following language: * Before existing language add "After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed," * Edit existing regulations to read as "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing is within the existing carrying capacity of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102(2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2)(C))."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	13	Subpart 4130 - Authorizing Grazing Use	43 CFR § 4130 Free-Use Grazing Permits Unfortunately, California has experienced an exceptional amount of intense and catastrophic wildfire. Free-use grazing permits for fuel reduction purposes should be added to the list as a fuel reduction tool on public land. We suggest amending the regulation as follows: * Strike § 4130.3-1 subsection (c)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	25	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4180.1(a) Fundamentals of rangeland health. Part 4180 should be removed from the Grazing Regulations. Current BLM Grazing Regulations 4180 improperly direct BLM to act on qualitative assessments, not quantitative data. Rangeland health determinations should be based on quantitative data and not focused solely on livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	33	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.7 Ownership and identification of livestock. A part of this regulation addresses the situation where a permittee or lessee controls, but does not own, the livestock that graze on public lands and requires that the agreement giving "control" be filed with the authorized officer before any grazing use is approved. These livestock control agreements between two private parties are subject to Freedom of Information Act disclosure but often contain private financial and proprietary information. The regulation should be changed to permit BLM to review the control agreement but not require that it be filed with the authorized officer and subject to FOIA disclosure. Modify the regulation as follows: "§ 4130.7 Ownership and identification of livestock. (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives a permittee or lessee control of the livestock by another permittee or lessee shall be filed with reviewed by the authorized officer for approval prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. The authorized officer shall file a statement in the permit or lease file that 'the livestock control agreement has been reviewed and approved.'"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	29	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.7 Ownership and identification of livestock. Having livestock control agreements subject to Freedom of Information Act (FOIA) disclosure discloses private financial information and serves no public purpose. The language should be revised to permit BLM to review the control agreement but not require that it be included in files subject to FOIA disclosure: "§ 4130.7 Ownership and identification of livestock. (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives a permittee or lessee control of the livestock by another individual or business shall be filed with reviewed by the authorized officer for approval prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. The authorized officer shall f ile a statement in the permit or lease file that 'the livestock control agreement has been reviewed and approved.'"

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	49	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.7 Ownership and identification of livestock. Having livestock control agreements subject to Freedom of Information Act (FOIA) disclosure discloses private financial information and serves no public purpose. The language should be revised to permit BLM to review the control agreement but not require that it be included in files subject to FOIA disclosure:
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	50	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.7 Ownership and identification of livestock. Having livestock control agreements subject to Freedom of Information Act (FOIA) disclosure discloses private financial information and serves no public purpose. The language should be revised to permit BLM to review the control agreement but not require that it be included in files subject to FOIA disclosure:
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	16	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.7 Ownership and identification of livestock. Having livestock control agreements subject to Freedom of Information Act (FOIA) disclosure discloses private financial information and serves no public purpose. The language should be revised to permit BLM to review the control agreement but not require that it be included in files subject to FOIA disclosure: "§ 4130.7 Ownership and identification of livestock. (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives a permittee or lessee control of the livestock by another individual or business shall be reviewed by the authorized officer for approval prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. The authorized officer shall file a statement in the permit or lease file that 'the livestock control agreement has been reviewed and approved.'"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	32	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.6-3 Crossing Permits. Crossing (or trailing) is often an essential operational activity for livestock travel to and from a permitted grazing allotment. These activities are provided for in subpart 4130.6-3, but stronger language is needed to clarify the existing statutory authority (including provisions passed by Congress in P.L. 113-291) provided to an AO. We recommend the following language be added to §4130.6-3: § 4130.6-3 Crossing permits Add just before existing language: "After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed," Additionally, we recommend the following changes to the existing Regulations: "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing is within the existing carrying capacity of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	15	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.6-3 Crossing Permits. Crossing (or trailing) permits are useful tools for grazing management. Revisions in the language will improve use of the permits and better incorporate provisions passed by Congress in P.L. 113-291. 43 CFR §4130.6-3 should be modified as below: § 4130.6-3 Crossing permits After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed," "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing does not reduce or otherwise affect the existing permitted use of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	28	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.6-3 Crossing Permits. Crossing (or trailing) permits are useful tools for grazing management. Revisions in the language will improve use of the permits and better incorporate provisions passed by Congress in P.L. 113-291. 43 CFR §4130.6-3 should be modified as below: § 4130.6-3 Crossing permits After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed," "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing does not reduce or otherwise affect the existing permitted use of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National E nvironmental Policy Act (42 U.S.C. 4332 (2) (C))."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	16	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.6-2 Temporary Non-Renewable Permits BLM does not currently have a sufficient mechanism in place to enable the agency to act in a timely manner to manage high fuel loads, invasive weeds and annual grasses, and other seasonal variabilities. In most cases where these conditions occur, BLM is unable to gather date, write NEPA, and issue a decision before the end of the season to make use of the available forage and/or seasonal variability to adequately manage the range. Particularly in areas with repeated fire history, BLM needs the flexibility to adaptively manage the fuel loads through grazing. To remedy this, a section should be added to 4130.6-2 stating: "(b)BLM may issue decisions authorizing nonrenewable grazing permits in full force and effect under subpart 4160."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	31	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.6-1 Exchange-of-use grazing agreements. The exchange-of-use concept allows the BLM to enter an agreement with a livestock operator to exchange the use of forage on private land for grazing on public lands. The issue is the scope of areas where exchange of use agreements will be permitted; whether it be limited to only private lands within an allotment or more broadly available for other lands outside an allotment. PLC and CCA believe that limiting exchange-of-use agreements to only private lands within an allotment is too narrow and reduces livestock use on BLM lands across the west. Amend the exchange-of-use regulation as follows: "§ 4130.6-1 Exchange-of-use grazing agreements. (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands in the same allotment when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	22	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.6-1 Exchange-of-use grazing agreements. Clarification of the exchange of use regulations will reduce confusion and improve use of this tool to best manage intermingled private and public lands. The exchange of use language should be revised as follows: "§ 4130.6-1 Exchange-of-use grazing agreements. (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	14	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.6-1 Exchange-of-use grazing agreements. Clarification of the exchange of use regulations will reduce confusion and improve use of this tool to best manage intermingled private and public lands. The exchange of use language should be revised as follows: "§ 4130.6-1 Exchange-of-use grazing agreements. (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	27	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.6-1 Exchange-of-use grazing agreements. Clarification of the exchange of use regulations will reduce confusion and improve use of this tool to best manage intermingled private and public lands. The exchange of use language should be revised as follows: "§ 4130.6-1 Exchange-of-use grazing agreements. (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands in the same allotment when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	10	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.6-1 Exchange-of-use grazing agreements. Clarification of the exchange of use regulations will reduce confusion and improve use of this tool to best manage intermingled private and public lands. The exchange of use language should be revised as follows: OLD TEXT "§ 4130.6-1 Exchange-of-use grazing agreements. (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands in the same allotment when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use." NEW TEXT "§ 4130.6-1 Exchange-of-use grazing agreements. (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	15	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.3-2 Flexibility This is one area where the regulations could be revised to enable greater flexibility. We encourage the addition of a new subsection as follows: "(i) A provision disclosing the criteria to authorize additional forage on a temporary basis due to conditions, like higher than normal forage production growth, showing forage temporarily in excess of the livestock carrying capacity."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	29	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.3-1 Mandatory terms and conditions. PLC and CCA's concern to avoid arbitrary decision-making and requiring decisions to be based on quantitative data was raised above in our proposed edit to the definition of "Monitoring" to use quantitative data. We also believe quantitative data should be used when the authorized officer determines carrying capacity. Therefore, modify the first paragraph discussing mandatory terms and conditions as follows: "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data." (b)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	16	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.3-1 Mandatory terms and conditions. Quantitative data should be used to determine carrying capacity. The following changes to the mandatory terms and conditions should be made: "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	11	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.3-1 Mandatory terms and conditions. Quantitative data should be used to determine carrying capacity. The following changes to the mandatory terms and conditions should be made: "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	16	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.3-1 Mandatory terms and conditions. The Livestock Groups shared our desire to avoid arbitrary decision-making and require decisions to be based on quantitative data above in our proposed edit to the definition of "Monitoring" to use quantitative data. We also believe quantitative data should be used when the AO determines carrying capacity. Therefore, we propose modifying the first paragraph which discusses mandatory terms and conditions as follows: "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	25	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.3-1 Mandatory terms and conditions. Quantitative data should be used to determine carrying capacity. The following changes to the mandatory terms and conditions should be made: "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	28	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.1-2 Conflicting applications. When there are conflicting applications for livestock grazing use, the current regulations allow the authorized officer to consider whether an applicant allows "public ingress or egress across privately owned or controlled land to public lands." 43 C.F.R. § 4110.1-2(d). An applicant who does not allow public access across their own private land should not be penalized for not providing the general public access over its private land. Allowing public access across private land should not be a criterion for who may or may not obtain approval of an application for grazing use. Therefore, delete 43 C.F.R. § 4110.1-2(d) which provides as a factor "public ingress or egress across privately owned or controlled land to public lands."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	15	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.1-2 Conflicting applications. Granting public access across private land should not be required to obtain approval of an application for grazing use and/or a grazing permit. The portion of 43 C.F.R. § 4110.1-2(d) which provides as a factor "public ingress or egress across privately owned or controlled land to public lands" should be deleted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	10	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.1-2 Conflicting applications. Granting public access across private land should not be required to obtain approval of an application for grazing use and/or a grazing permit. The portion of 43 C.F.R. § 4110.1-2(d) which provides as a factor "public ingress or egress across privately owned or controlled land to public lands" should be deleted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	24	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.1-2 Conflicting applications. Granting public access across private land should not be required to obtain approval of an application for grazing use and/or a grazing permit. The portion of 43 C.F.R. § 4110.1-2(d) which provides as a factor "public ingress or egress across privately owned or controlled land to public lands" should be deleted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	13	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.1-2 Conflicting applications. Granting public access across private land should not be required to obtain approval of an application for grazing use and/or a grazing permit. The portion of 43 C.F.R. § 4110.1-2(d) which provides as a factor "public ingress or egress across privately owned or controlled land to public lands" should be deleted. 43 C.F.R. § 4130.3-1 Mandatory terms and conditions. Quantitative data should be used to determine carrying capacity. The following changes to the mandatory terms and conditions should be made: OLD TEXT: § 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall speci-fy the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in ani-mal unit months, for every grazing permit or lease. The authorized livestock grazing use shall not exceed the live-stock carrying capacity of the allotment. COMMENTER'S RECOMMENDED NEW TEXT: "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	17	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130 Free-use grazing permits. Wildfire has increased in frequency and intensity. It is the most damaging factor to habitat values and forage production. The regulations should support responsible use of livestock grazing a s tool for finefuel reduction. The following changes will facilitate better use of free-use grazing permits and targeted grazing. Delete from 43 CFR 4131.3-1: "Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	12	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130 Free-use grazing permits. Wildfire has increased in frequency and intensity. It is the most damaging factor to habitat values and forage production. The regulations should support responsible use of livestock grazing a s tool for finefuel reduction. The following changes will facilitate better use of free-use grazing permits and targeted grazing. Delete from 43 CFR 4131.3-1: "Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	18	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130 Free-use grazing permits. Across the West, range fires are becoming more frequent, intense, and widespread. We recommend that free-use grazing permits for fuel reduction be added to the list as a tool to provide a nimble tool to reduce hazardous fuels on public land. We recommend revising the regulation at § 4130.3-1 by striking subsection (c) as follows: OLD TEXT (from 2006 BLM Grazing Regulations): "Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part. NEW TEXT AND RATIONALE: Commenter suggests striking subsection (c) from § 4130.3-1 Further, we recommend the revision and subsequent additions in § 4130.3-2 as follows: "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds and/or annual grasses. (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire." (5) Targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO. Strike subsection (e): OLD TEXT (from 2006 BLM Grazing Regulations): "(e) The kinds of indigenous animals authorized to graze under specific terms and conditions" NEW TEXT AND RATIONALE: Commenter suggests to delete all of sub-section e from § 4130.3-2 Revise subsection (f): OLD TEXT (from 2006 BLM Grazing Regulations): (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; NEW TEXT: (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; RATIONALE: Commenter suggests adding a new subsection: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal." Without question, the

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	26	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130 Free-use grazing permits. Wildfire has increased in frequency and intensity. It is the most damaging factor to habitat values and forage production. The regulations should support responsible use of livestock grazing a s tool for finefuel reduction. The following changes will facilitate better use of free-use grazing permits and targeted grazing. Delete from 43 CFR 4131.3-1: " Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part. Revise 43 CFR 4130.3-2 as follows: "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; or (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds and/or annual grasses.; or (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of f uture wildfire; or (5) The primary purpose of grazing use is targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO. Delete subsection (e): " (e) The kinds of indigenous animals authorized to graze under specific terms and c onditions" Revise subsection (f): (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; Add a new subsection: " (i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	14	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130 Free-use grazing permits. Wildfire has increased in frequency and intensity. It is the most damaging factor to habitat values and forage production. The regulations should support responsible use of livestock grazing a s tool for finefuel reduction. The following changes will facilitate better use of free-use grazing permits and targeted grazing. Delete from 43 CFR 4131.3-1: COMMENTER RECOMMENDS DELETION OF: Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davis	Tyler	Arizona Farm Bureau Federation	AZ	1122	8	Subpart 4130 - Authorizing Grazing Use	43 C.F.R § 4130.7 Owner and identification of livestock A part of this regulation addresses the situation where a permittee or lessee controls, but does not own, the livestock that graze on public lands and requires that the agreement giving "control" be filed with the authorized officer before any grazing use is approved. These livestock control agreements between two private parties are subject to Freedom of Information Act disclosure but often contain private financial and proprietary information. The regulation should be changed to permit BLM to review the control agreement but not require that it be filed with the authorized officer and subject to FOIA disclosure. Modify the regulation as follows: "§ 4130.7 Ownership and identification of livestock. OLD TEXT (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives the permittee or lessee control of the livestock by the permittee or lessee shall be filed with the authorized officer and approval re-ceived prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. NEW TEXT (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives a permittee or lessee control of the livestock by another permittee or lessee shall be filed with reviewed by the authorized officer for approval prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. The authorized officer shall file a statement in the permit or lease file that 'the livestock control agreement has been reviewed and approved.'" AZFB believes that there should be no surcharge for this action. Ranchers use this method as a management tool for the health of the vegetation when excess or ephemeral forage is available. These are proactive conservation actions, and a rancher should not be punished for employing good land stewardship practices.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davis	Tyler	Arizona Farm Bureau Federation	AZ	1122	7	Subpart 4130 - Authorizing Grazing Use	43 C.F.R § 4130.6-3 Crossing Permits Crossing (or trailing) is often an essential operational activity for livestock travel to and from a permitted grazing allotment. These activities are provided for in subpart 4130.6-3, but stronger language is needed to clarify the existing statutory authority (including provisions passed by Congress in P.L. 113-291) provided to an AO. We recommend the following language be added to §4130.6-3: § 4130.6-3 Crossing permits Add just before existing language: "After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed," Additionally, we recommend the following changes to the existing Regulations: OLD TEXT "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. NEW TEXT "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing is within the existing carrying capacity of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))." AZFB has a few members within the state that regularly cross other ranches to reach new or different grazing areas. Normally, the ranchers call each other in advance and the crossing is minimally intrusive - it only takes around thirty minutes to an hour. In these cases, a rancher does not need a permit because neighbors have a friendly relationship with one another and the crossing time is negligible. However, if there is ever a case where the relationship between neighbors is adversarial, or there would be an extensive crossing time, then permits would be a useful and helpful option for facilitating a successful crossing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davis	Tyler	Arizona Farm Bureau Federation	AZ	1122		Subpart 4130 - Authorizing Grazing Use 6	43 C.F.R § 4130.6-3 Crossing Permits Crossing (or trailing) is often an essential operational activity for livestock travel to and from a permitted grazing allotment. These activities are provided for in subpart 4130.6-3, but stronger language is needed to clarify the existing statutory authority (including provisions passed by Congress in P.L. 113-291) provided to an AO. We recommend the following language be added to §4130.6-3: § 4130.6-3 Crossing permits Add just before existing language: "After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed," Additionally, we recommend the following changes to the existing Regulations: OLD TEXT "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. NEW TEXT "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing is within the existing carrying capacity of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))." AZFB has a few members within the state that regularly cross other ranches to reach new or different grazing areas. Normally, the ranchers call each other in advance and the crossing is minimally intrusive - it only takes around thirty minutes to an hour. In these cases, a rancher does not need a permit because neighbors have a friendly relationship with one another and the crossing time is negligible. However, if there is ever a case where the relationship between neighbors is adversarial, or there would be an extensive crossing time, then permits would be a useful and helpful option for facilitating a successful crossing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Waite	Anita M.	Big Sandy NRDC	AZ	1437		Subpart 4130 - Authorizing Grazing Use 7	4130.8-1 Payment of fees (d) A surcharge shall be added to the grazing fee billing for authorized grazing of livestock owned by persons other than the permittees or lessees. This entire paragraph should be removed. As long as the forage is available and livestock is permitted what difference does it make who owns the animals as long as the permittees or lessees have control and management of the livestock on their allotment.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miyamoto	Doug	Wyoming Department of Agriculture	WY	910		Subpart 4130 - Authorizing Grazing Use 9	4130.6-3 - Crossing Permits: -We support the streamlining of the crossing authorization process. Crossing authorizations are for the most part Categorically Excluded from NEPA; however, they stili require a Proposed Decision and Protest process. We support the ability of the authorized officer to make these decisions administratively and be effective Immediately and not subject to the Proposed Decision and Protest process.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miyamoto	Doug	Wyoming Department of Agriculture	WY	910	8	Subpart 4130 - Authorizing Grazing Use	4130.6-2 - Nonrenewable Grazing Permits and leases: -Nonrenewable grazing permits and leases are available to the authorized officer to make management decisions to address resource concerns and to maintain healthy rangelands. The authorized officer should be able to address resource concerns, utilize targeted grazing, incorporate vegetation treatments and Implement fire recovery efforts in order to adjust to the changing environment In a timely manner. The requirement to consult, cooperate, and coordinate with interested public prior to an authorized officer decision Is often not conducive to making time sensitive decisions. We support the ability of the authorized officer to make these decisions administratively and be effective immediately and not subject to the Proposed Decision and Protest process. -Targeted Grazing: Targeted grazing Is an Important tool to utilize domestic livestock grazing to treat and manage desired vegetation composition and structure, as well as undesirables Including Invasive and noxious weeds. Examples of targeted grazing Include managing cheatgrass and creating fuel breaks. The authorized officer should have the ability to use Targeted Grazing to quickly adjust to changing environmental conditions. -We are aware of how existing BLM regulations and prohibitive terms and conditions made the projects unproductive and economically unrealistic for grazing permittees to Implement and meet the Intent of the targeted grazing project. These projects need absolute flexibility to the terms and conditions, not more restrictions. We also recommend expanding all grazing permits, especially targeted grazing projects to Include more than one type of livestock. existing terms and conditions for existing type of livestock may not actually adequately address the vegetation and should be expanded. We support the ability of the authorized officer to make these decisions administratively and be effective Immediately and not subject to the Proposed Decision and Protest process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	36	Subpart 4130 - Authorizing Grazing Use	4130.6: Other grazing authorizations: The WSGB requests that a paragraph be added to this Section to say, " The AO does not have the authority to convert Federal lands within a dedicated stock driveway into a BLM allotment, and the AO is authorized to rescind and/or amend a LUP for any action taken by an AO to do this in the past.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miyamoto	Doug	Wyoming Department of Agriculture	WY	910	6	Subpart 4130 - Authorizing Grazing Use	4130.4 Approval of changes in grazing use within the terms and conditions of permits and leases -We support the ability of the authorized officer to make administrative changes to permits within the terms and conditions. This is Just one reason to broaden the terms and conditions of the permits to allow more flexibility to the agency and the permittees. Narrowly written permits are not conducive to address environmental conditions, such as snow, spring turn out, drought, or changed resource conditions. When permittees are authorized temporary nonuse, we urge the agency to actively pursue other permittees in need of additional forage to temporarily use these AUMs. We also urge the BLM to remove the Conservation Use Permit from the regulations, as this provision was struck down in 1998 by the 10th Circuit Court and never removed from the regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	34	Subpart 4130 - Authorizing Grazing Use	4130.3-2 Other terms and conditions - All terms and conditions on a permit or lease must be reasonably related to range health progress or lack of progress under which the permittee has control. These terms and conditions must not be any stricter than the previous terms without an EA to determine the environmental effects of the proposed terms and conditions. Any new terms and conditions must only be authorized after careful and considered consultation, cooperation and coordination with affected permittees, state and local governments.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Thille	Rod		NM	1394	3	Subpart 4130 - Authorizing Grazing Use	4130.3-2 (d) be deleted from the regulations. This not needed unless a permitter is being billed after the fact.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miyamoto	Doug	Wyoming Department of Agriculture	WY	910	5	Subpart 4130 - Authorizing Grazing Use	4130.2 Grazing permits of leases -4130.2(d) ""The term 0/ grazing permits or leases authorizing livestock grazing an the public lands...shall be 10 years unless ... We understand permits have always been on a ten year timeline, but we would urge BLM to reconsider this binding time line and increase the permits from 10 to 20 years. We are aware of very few permits actively reanalyzed and updated every ten years. Realistically, most permits are pushing 20 years with no new NEPA and with old and outdated AMPs. To exacerbate the delay there Is an ever increasing national requirement for agency staff to collect additional data, such as sage-grouse habitat and AIM data on top of annual utilization and trend monitoring for standards and guidelines.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	30	Subpart 4130 - Authorizing Grazing Use	4130.1-2 Conflicting applications - IFBF recommends that paragraph (d) should be deleted as this topic should have no bearing on the decision between two applicants.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Thille	Rod		NM	1394	2	Subpart 4130 - Authorizing Grazing Use	4130.1-2 (d) be deleted from the regulations. For a rancher having to give his private property rights to the general public is extortion.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Pearce	Benjamin	Pearce Trust	NM	937	3	Subpart 4130 - Authorizing Grazing Use	3) Pearce Trust supports the granting of immediate approval or denial of livestock crossing permits. The expedited paperwork will allow for other applications and permits being returned at a faster rate.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	24	Subpart 4130 - Authorizing Grazing Use	13) BLM should set a fair and equitable grazing fee based on comparable private land prices. For example, the current 2020 public lands grazing fee was once again authorized at \$1.35 per AUM, a fee that has largely been in place since the 1970s and has not kept pace with the cost to the public of grazing these lands. Taxpayers are subsidizing livestock grazing which has ironically contributed to the destruction of our native rangelands and native wildlife species and plants. On many state owned lands, grazing fees are 8 to 12 times higher and, because ranchers have to pay the fair economic value, the lands are managed more efficiently, cost effectively and typically have less environmental damage.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Meeks	Shari	Sublette County Conservation District	WY	1353	6	Subpart 4130 - Authorizing Grazing Use	§4130.6-3 Crossing Permits. SCCD feels that crossing or trailing permits need to be expedited when livestock are not spending a more than a day on BLM administered lands. BLM should have authority to respond to these requests in emergency situations such as wildfire or other natural disasters. SCCD would like to see the BLM incorporate regular crossing or trailing permits that happen yearly into the requesting permittee's grazing permit. This action would create efficiencies in paperwork and management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Meeks	Shari	Sublette County Conservation District	WY	1353	4	Subpart 4130 - Authorizing Grazing Use	§4130.4 Authorization of temporary changes in grazing use within the terms and conditions of permits and leases, including temporary nonuse. SCCD would encourage the BLM to look at including a Temporary Non-Renewable analysis into the permit renewal to allow the BLM and the permittee the ability to respond to resource concerns like fuel loading and other issues that may need a TNR on very short notice. SCCD strongly believes in flexibility and timeliness regarding opportunities or needs that arise with short notice. SCCD encourages and supports the incorporation of outcome based grazing into BLM regulations in order to be as flexible as possible. This allows both the BLM and the permittee the ability to adapt to changes on the landscape and make positive improvements to the land as opportunity allows.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Meeks	Shari	Sublette County Conservation District	WY	1353	5	Subpart 4130 - Authorizing Grazing Use	§4130.2 Grazing permits or leases. SCCD believes that the BLM needs to take a hard look at the permit renewal process. SCCD suggests varying NEPA requirements based on the category that an allotment is classified under. The approach of expediting permit renewal for allotments under the conditions mentioned below could alleviate ID Team members such that they are enabled to focus on areas that are not meeting rangeland health standards and guidelines, thus having the potential for greater overall watershed health within field offices. If the allotment is classified as "m" or "c" and no changes are being proposed at the time of permit renewal, and the allotment is meeting Rangeland Health Standards and Guidelines, then SCCD feels that permit renewal could be expedited using a Categorical Exclusion (CE) instead of doing a full analysis through an Environmental Assessment (EA) or Environmental Impact Statement (EIS). SCCD would also encourage the BLM to extend the duration of permits meeting standards from 10 years to 20 years. The time it takes to follow the current permit renewal process is extensive and currently can take up to 7 years or more for a permit to be fully processed. The current timeline does not allow for any potential management changes to be assessed appropriately.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	33	Subpart 4130 - Authorizing Grazing Use	§ 4130.3-1 Mandatory Terms and Conditions - Again, flexibility must be allowed in the number of livestock and the period(s) of use so that BLM and permittees can adaptively manage livestock in conjunction with annual changes in the amount of forage available and the time it is ready for grazing. As BLM and the permittees work together, the range will be better managed, will more often meet or exceed rangeland health standards, will "become as productive as feasible for all rangeland values" (PRIA) and will simultaneously reduce incidence of wildfire and destruction of wildlife habitat, recreation opportunities, watersheds and other important rangeland values.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	60	Subpart 4130 - Authorizing Grazing Use	§ 4130.3 Terms and conditions. OLD TEXT Livestock grazing permits and leases shall contain terms and conditions determined by the authorized officer to be appropriate to achieve management and resource condition objectives for the public lands and other lands administered by the Bureau of Land Management, and to ensure conformance with the provisions of subpart 4180 of this part. NEW TEXT Livestock grazing permits and leases shall contain terms and conditions determined by the authorized officer to achieve APPLICABLE objectives IN THE LAND USE PLAN OR ACTIVITY PLANS. RATIONALE See insertions and deletions

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	ortega	adam	Colorado Department of Agriculture	CO	981	9	Subpart 4130 - Authorizing Grazing Use	§ 4130.2 Grazing permits or leases BLM's capacity to process permits or leases on a 10 year term is limited and translates to the backlog of permits in Colorado that are authorized under the appropriation authorization. BLM's use of an adaptable allotment management plan would allow authorized officers to coordinate with permittees and the state to adjust grazing to maintain or improve resources. Use of more adaptable allotment management plans, improving or maintaining resource concerns, and quantitative monitoring have the potential to increase the BLM's use of categorical exclusions for permit renewal and reduce the backlog of permits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Rosemary			1194	7	Subpart 4130 - Authorizing Grazing Use	(g) (1) Federal Courts have ruled that Conservation Use grazing permits are illegal. Therefore, applicants must be in the livestock business which has been the criteria for a permit since the enactment of the Taylor Grazing Act in 1934. This should be clear in the regulations. Additionally, proper livestock grazing is supported by peer-reviewed science-based research to be one of the only ways to maintain the health of western rangelands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davis	Tyler	Arizona Farm Bureau Federation	AZ	1122	1	Subpart 4130 - Authorizing Grazing Use	"Monitoring" - Edit the definition of "monitoring" by adding the word "quantitative" before "data" so that the definition reads: "Monitoring" means the periodic observation and orderly collection of quantitative data to evaluate..." It is vital to avoid "best guess" opinions by BLM on grazing decisions that have economic and practical implications to our permittees. AZFB believes decision making regarding the administration of grazing permits must be made using proven and accepted scientific analysis and methods.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rodriguez	Dan	Mohave County Farm and Livestock Bureau	AZ	1489	4	Subpart 4130 - Authorizing Grazing Use	"Grazing Surcharge" Grazing livestock owned by others assist the rancher in managing his ranch. This allows the rancher to use extra forage while keeping control of his allotment and should not be punished for good management practices. This should be eliminated and return to before 'Rangeland 94'.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rodriguez	Dan	Mohave County Farm and Livestock Bureau	AZ	1489	3	Subpart 4130 - Authorizing Grazing Use	"Grazing permits or leases" Should be for a 20 year period. A 20 year penni til ease would assist the BLM with their work load for the renewal process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bellwood	Samantha	Nevada Department of Agriculture	NV	1009	9	Subpart 4130 - Authorizing Grazing Use	- CFR 4130.6-2 -Nonrenewable grazing permits/leases: These permits, and leases are available to the authorized officer to make management decisions to address resource concerns and to adjust management to help maintain healthy lands. The authorized officer should be able to address resource concerns, targeted grazing, vegetation treatments and fire recovery efforts in order to adjust to the changing environment. The Department supports the use of nonrenewable grazing permits/leases and the ability of the authorized officer to make these decisions administratively, be effective immediately, and not subject to the Proposed Decision and Protest Process. Inclusion of these scenarios could also be included under permits already analyzed and embedded into a flexible AMP to alleviate triggering additional NEPA.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Winkler	Rich	Malpai Borderlands Group		1232	1	Subpart 4130 - Authorizing Grazing Use	These regulations need to establish a system of 10-year term permits, while providing flexibility to vary numbers or seasons of use on a yearly basis in response to such unforeseen factors as drought, loss of forage to fire or flood, etc. Permits for less than 10 years should be a rare exception.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	27	Subpart 4130 - Authorizing Grazing Use	The Livestock Groups further suggest adding a new section establishing that permit renewals which do not increase or decrease permitted grazing use by more than ten percent are categorically excluded under NEPA: "§ 4130.10 Documentation required for renewal of grazing permits and leases. If the authorized officer renews a grazing permit or lease that contains less than a ten percent increase or decrease in permitted grazing use, then the decision shall be documented under the National Environmental Policy Act 1969 with a categorical exclusion. Finally, in cases where an adverse determination has been made, BLM should also adopt the following process to renew a grazing permit: * Applicable monitoring data must be collected with careful quantification and application of scientific protocols. * BLM should prepare a draft allotment assessment without a pre-determined assumption that the causal factors relate to livestock grazing. * BLM should notify permittee(s) that submission of a permit renewal application is required. While it is appreciated that the permittee(s) may not know at the time of the application as to BLM's causal factor determinations, the permittee(s) will be given an opportunity to submit the permit renewal application. * BLM should issue final rangeland determination and land use plan objectives determination, along with notice as to the permittee(s) and to the public of either of the following: o If there are no adverse determinations, and if the permittee(s) does not apply for any substantially new or different terms and conditions, BLM should provide notice to the permittee(s) and to the public that BLM will prepare a categorical exclusion, as authorized by the Federal Land Policy and Management Act, 43 U.S.C. § 1752(h), and issue a proposed decision to renew the grazing permit o If there are adverse determinations and/or if the permittee(s) applies for a permit renewal with substantial new or different terms, BLM should provide notice to the permittee(s) and to the public that BLM will prepare a NEPA document for public comment. This notice should also ask the permittee(s) to submit any modified permit renewal application to be assessed in any NEPA document. o If adverse determinations are made and an affected permittee owns or controls private grazing resources in an amount equal to or greater than 10% of any pasture or the allotment as a whole, the permittee may request and BLM will develop an AMP or functional equivalent management plan to be analyzed in any NEPA document. * Following required analyses and determinations, BLM should follow regular NEPA protocols. * If necessary, BLM should supplement the final NEPA document, and issue a final decision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Ade	Kane County Commissioners	UT	1141	13	Subpart 4130 - Authorizing Grazing Use	The BLM's grazing regulations should be updated to better accommodate rotational grazing (also known as deferred grazing, rest-rotation grazing, and other terms). Rotational grazing significantly benefits rangeland health and livestock, having been successfully implemented on a large scale at several sites in Utah. These efforts were designed to enhance forage for livestock, improve wildlife habitat, and protect water quality. Rotational grazing is also an effective way to maintain existing levels of AUMs in situations where rangeland health deteriorates due to drought, over-use by wild ungulates, or other conditions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gordon	Mark			1264		2 Subpart 4130 - Authorizing Grazing Use	The BLM should also coherently consider its approach to billing and actual use. I have heard of several cases where BLM offices deny flexibility in pennits, either at the beginning or end of the grazing season, because the computer system used by the field office does not allow for calculations of bills outside of permit dates even though the actual number of Animal Unit Months (AUMs) or livestock would not change. BLM must build flexibility into their grazing regulations to accommodate changes in grazing strategies that may be needed from year to year. Phenology and seasons are variable and the regulations should allow the BLM to make logical, science-based adjustments to permits when events like a late spring impact turn-out dates. This is likely another place where Categorical Exclusions would be a useful tool to help streamline the process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	19	Subpart 4130 - Authorizing Grazing Use	Subpart 4130.3-1 (Mandatory terms and conditions) Farm Bureau policy stresses that agency decisions have as a basis, documented specific, proven science-based reasons for decisions made and actions taken. In our review of 4130.3-1 covering "Mandatory terms and conditions" we propose that the first paragraph be modified, adding [wording] wording... ORIGINAL [NOT 2006/unknown origin] TEXT (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity COMMENTER'S SUGGESTED NEW TEXT (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	17	Subpart 4130 - Authorizing Grazing Use	Revise subsection (f): OLD TEXT: (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; Add a new subsection: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	18	Subpart 4130 - Authorizing Grazing Use	Revise subsection (f): OLD TEXT: (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; Add a new subsection: "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	15	Subpart 4130 - Authorizing Grazing Use	Revise 43 CFR 4130.3-2 as follows: OLD TEXT: "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; or (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds and/or annual grasses COMMENTER'S RECOMMENDED NEW TEXT "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; or (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds and/or annual grasses.; or (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire; or (5) The primary purpose of grazing use is targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	15	Subpart 4130 - Authorizing Grazing Use	Revise 43 CFR 4130.3-2 as follows: OLD TEXT FOR FREE-USE GRAZING PERMITS (FOUND AT 4130.5 IN KNOWN VERSIONS OF GRAZING REGS): § 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of author-ized grazing use or conservation use is the management of vegetation to meet resource objectives other than the pro-duction of livestock forage and such use is in conformance with the require-ments of this part; (2) The primary purpose of grazing use is for scientific research or admin-istrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds. COMMENTER'S RECOMMENDED NEW TEXT: § 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; or (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds and/or annual grasses or (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire; or (5) The primary purpose of grazing use is targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	9	Subpart 4130 - Authorizing Grazing Use	Revise 43 CFR 4130.3-2 as follows: "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: OLD TEXT (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; NEW TEXT (1) The primary objective of authorized grazing use use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; or OLD TEXT (KEEP) (2) The primary purpose of grazing use is for scientific research or administrative studies; or (3) The primary purpose of grazing use is the control of noxious weeds and/or annual grasses.; or NEW TEXT (4) The primary purpose of grazing use is fuel reduction to help avoid the spread of future wildfire; or (5) The primary purpose of grazing use is targeted grazing by livestock to accomplish a specific purpose as determined and authorized by an AO. Delete subsection (e): "(e) The kinds of indigenous animals authorized to graze under specific terms and conditions" Revise subsection (f): OLD TEXT (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; NEW TEXT (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; Add a new subsection: NEW TEXT "(i) Provisions for livestock grazing to be temporarily authorized as a fuels reduction tool shall be authorized under a Categorical Exclusion to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	43	Subpart 4130 - Authorizing Grazing Use	OLD TEXT Livestock grazing permits and leases shall contain terms and conditions de-termined by the authorized officer to be appropriate to achieve management and resource condition objectives for the public lands and other lands admin-istered by the Bureau of Land Manage-ment, and to ensure conformance with the provisions of subpart 4180 of this part. NEW TEXT § 4130.3 Terms and conditions. Livestock grazing permits and leases shall contain terms and conditions determined by the authorized officer to be appropriate to achieve grazing management and resource condition objectives for the public lands and other lands administered by the Bureau of Land Management,
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	45	Subpart 4130 - Authorizing Grazing Use	OLD TEXT § 4130.3-2 Other terms and conditions. The authorized officer may specify in grazing permits or leases other terms and conditions which will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands. These may in-clude but are not limited to: NEW TEXT § 4130.3-2 Other terms and conditions. The authorized officer may specify in grazing permits or leases other terms and conditions which will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands.: RATIONALE "Terms and conditions" should be limited and not unlimited to protect the privileges and rights of the permittee or lessee. Leaving terms and conditions open would allow agency personnel to impose their preference on these individuals, contributing to or causing failure in management. The agency should also be held accountable for their part of the terms and conditions. We have seen where the agency includes things they are supposed to do, but never get accomplished.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	65	Subpart 4130 - Authorizing Grazing Use	OLD TEXT _____ NEW TEXT (i) A provision disclosing the need and requirements of trailing across public lands. (j) A provision disclosing the criteria to authorize additional forage on a temporary basis due to weather conditions, resulting in higher than normal forage production growth. RATIONALE Comment [AS35]: This is important to avoid a permittee or lessee from having to separately obtaining Crossing Permits since the trailing term & condition will be in any renewed or new grazing permit or lease. Comment [AS36]: This is important to avoid a permittee or lessee from having to apply for a nonrenewable grazing permit since this term & condition will be in any renewed or new grazing permit or lease.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	59	Subpart 4130 - Authorizing Grazing Use	OLD TEXT (f) The authorized officer will not offer, grant or renew grazing permits or leases when the applicants, including permittees or lessees seeking renewal, refuse to accept the proposed terms and conditions of a permit or lease. (g) Temporary nonuse and conservation use may be approved by the authorized officer if such use is determined to be in conformance with the applicable land use plans, allotment management plan or other activity plans and the provisions of subpart 4180 of this part. (1) Conservation use may be approved for periods of up to 10 years when, in the determination of the authorized officer, the proposed use will promote rangeland resource protection or enhancement of resource values or uses, including more rapid progress toward resource condition objectives; or (2) Temporary nonuse for reasons including but not limited to financial conditions or annual fluctuations of livestock, may be approved on an annual basis for no more than 3 consecutive years. Permittees or lessees applying for temporary nonuse shall state the reasons supporting nonuse. (h) Application for nonrenewable grazing permits and leases under §§ 4110.3-1 and 4130.6-2 for areas for which conservation use has been authorized will not be approved. Forage made available as a result of temporary nonuse may be made available to qualified applicants under § 4130.6-2. NEW TEXT (f) The authorized officer will not offer, grant or renew grazing permits or leases when the applicants, including permittees or lessees seeking renewal, refuse to accept the proposed terms and conditions of a permit or lease SUBJECT TO SUBPART 4160. (g) Temporary nonuse _____ may be approved by the authorized officer if such use is determined to be in conformance with the applicable land use plans, allotment management plan or other activity plans _____. (h) Temporary nonuse for reasons including but not limited to financial conditions or annual fluctuations of livestock, WILL be approved BY THE AUTHORIZED OFFICER on an annual basis BUT ANY APPROVED NONUSE FOR OTHER THAN RESOURCE REASONS CAN BE ALLOCATED IN CONFORMANCE WITH SECTION 4120.33(C) AND SECTION 4130.2(i) . Permittees or lessees applying for temporary nonuse shall state the reasons supporting nonuse. (i) Any approved temporary nonuse beyond 50% of the Active use in the allotment may be allocated for grazing use to any qualified applicant subject to Section 4120.33(c). If more than one qualified applicant, the allocation for grazing use will be made in accordance with Section 4130.12. RATIONALE Comment [AS33]: This rule should be amended to not restrict a permittee or lessee from applying nonuse, though the rule should clarify that any authorized nonuse for reasons other than resource reasons may be authorized to another qualified applicant as per Section 4120.33(c) and per
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	47	Subpart 4130 - Authorizing Grazing Use	OLD TEXT (e) The kinds of indigenous animals authorized to graze under specific terms and conditions; NEW TEXT DELETED OLD TEXT RATIONALE Indigenous animals are not authorized or permitted, they cannot be controlled so what is the purpose of this?
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	62	Subpart 4130 - Authorizing Grazing Use	OLD TEXT (c) Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part. NEW TEXT _____. RATIONALE See deletion

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	67	Subpart 4130 - Authorizing Grazing Use	OLD TEXT (b) Changes in grazing use within the terms and conditions of the permit or lease may be granted by the authorized officer. Permittees and lessees may apply to activate forage in temporary nonuse or conservation use or to place forage in temporary nonuse or conservation use, and may apply for the use of forage that is temporarily available on designated ephemeral or annual ranges. NEW TEXT (b) Changes in grazing use within the terms and conditions of the permit or lease may be granted by the authorized officer. Permittees and lessees may apply TO CHANGE ACTIVE USE, TO MDIFY TERMS & CONDITIONS, to activate forage in temporary nonuse _____ or to place forage in temporary nonuse or conservation use, and may apply for the use of forage that is temporarily available on designated ephemeral or annual ranges.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	68	Subpart 4130 - Authorizing Grazing Use	OLD TEXT (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; NEW TEXT (1) The primary objective of authorized grazing use _____ is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	17	Subpart 4130 - Authorizing Grazing Use	I require the public be informed via the EIS of the average AUM livestock grazing payment costs in the private segment of livestock grazing verses the current public lands payment. For your convenience, here is the data: What is the average paid per month per Animal Unit (AUM) in 2018 in the REAL world? Lowest is \$9.50 (Nevada) to highest \$46.00 (Nebraska) BLM charges \$1.35 (2020) !!! Per the Oregon Annual Stats Bulletin page 15 https://www.nass.usda.gov/.../Annual.../2019/OR_ANN_2019.pdf
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ziemann	Lois		CO	644	1	Subpart 4130 - Authorizing Grazing Use	Allow for grazing permit retirement and long-term non-use for conservation purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	18	Subpart 4130 - Authorizing Grazing Use	43 CFR § 4130.6-1 Exchange-of-Use Grazing Agreements The limitation of exchange-of-use agreements to only private lands within an allotment is too narrow and reduces livestock use on BLM lands. We would recommend amending the exchange- of-use regulation to read: * "§ 4130.6-1 Exchange-of-use grazing agreements. (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	12	Subpart 4130 - Authorizing Grazing Use	43 CFR § 4130.3-1 Mandatory Terms and Conditions For this section, we must reiterate that BLM's decision should be based on science and quantitative data. This approach should also be utilized when an Authorized Officer determines carrying capacity. We recommend modifying the first paragraph discussing mandatory terms and conditions to read as "(a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	19	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.7 Ownership and identification of livestock. Having livestock control agreements subject to Freedom of Information Act (FOIA) disclosure discloses private financial information and serves no public purpose. The language should be revised to permit BLM to review the control agreement but not require that it be included in files subject to FOIA disclosure: OLD TEXT: "§ 4130.7 Ownership and identification of livestock. (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives the permittee or lessee control of the livestock by the permittee or lessee shall be filed with the authorized officer and approval re-ceived prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. COMMENTER'S RECOMMENDED NEW TEXT: "§ 4130.7 Ownership and identification of livestock. (d) Except as provided in paragraph (f) of this section, where a permittee or lessee controls but does not own the livestock which graze the public lands, the agreement that gives a permittee or lessee control of the livestock by another individual or business shall be filed with reviewed by the authorized officer for approval prior to any grazing use. The document shall describe the livestock and livestock numbers, identify the owner of the livestock, contain the terms for the care and management of the livestock, specify the duration of the agreement, and shall be signed by the parties to the agreement. The authorized officer shall file a statement in the permit or lease file that 'the livestock control agreement has been reviewed and approved."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	18	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.6-3 Crossing Permits. Crossing (or trailing) permits are useful tools for grazing management. Revisions in the language will improve use of the permits and better incorporate provisions passed by Congress in P.L. 113-291. 43 CFR §4130.6-3 should be modified as below: § 4130.6-3 Crossing permits OLD TEXT: A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public land or other land under Bureau of Land Management control, or both, with livestock for proper and lawful pur-poses. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. COMMENTER'S RECOMMENDED NEW TEXT: After consultation and coordination with existing permittees/lessees and any owners of private lands to be crossed," "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public and or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. Crossing, or trailing, authorizations shall be authorized under a Categorical Exclusion if the forage to be consumed during the trailing does not reduce or otherwise affect the existing permitted use of the area within the crossing permit. The Bureau of Land Management's approval of trailing practices shall not be subject to review under Section 102 (2)(C) of the National Environmental Policy Act (42 U.S.C. 4332 (2) (C))."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	17	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.6-1 Exchange-of-use grazing agreements. Clarification of the exchange of use regulations will reduce confusion and improve use of this tool to best manage intermingled private and public lands. The exchange of use language should be revised as follows: OLD TEXT: "§ 4130.6-1 Exchange-of-use grazing agreements. (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands in the same allotment when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use." COMMENTER'S RECOMMENDED NEW TEXT: "§ 4130.6-1 Exchange-of-use grazing agreements. (a) An exchange-of-use grazing agreement may be issued to an applicant who owns or controls lands that are unfenced and intermingled with public lands when use under such an agreement will be in harmony with the management objectives for the allotment and will be compatible with the existing livestock operations. The agreements shall contain appropriate terms and conditions required under § 4130.3 that ensure the orderly administration of the range, including fair and equitable sharing of the operation and maintenance of range improvements. The term of an exchange-of-use agreement may not exceed the length of the term for any leased lands that are offered in exchange-of-use."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Dearing Ranch		1311	10	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.3-1 Mandatory terms and conditions. Quantitative data should be used to determine carrying capacity. The following changes to the mandatory terms and conditions should be made: "§ 4130.3-1 Mandatory terms and conditions. (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, and the amount of flexibility authorized for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment as determined from quantitative data."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Dearing Ranch		1311	9	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130.1-2 Conflicting applications. Granting public access across private land should not be required to obtain approval of an application for grazing use and/or a grazing permit. The portion of 43 C.F.R. § 4110.1-2(d) which provides as a factor "public ingress or egress across privately owned or controlled land to public lands" should be deleted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	14	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130 Free-use grazing permits. Wildfire has increased in frequency and intensity. It is the most damaging factor to habitat values and forage production. The regulations should support responsible use of livestock grazing a s tool for finefuel reduction. The following changes will facilitate better use of free-use grazing permits and targeted grazing. Delete from 43 CFR 4131.3-1: COMMENTER RECOMMENDS DELETING: "Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Dearing Ranch		1311	11	Subpart 4130 - Authorizing Grazing Use	43 C.F.R. § 4130 Free-use grazing permits. Wildfire has increased in frequency and intensity. It is the most damaging factor to habitat values and forage production. The regulations should support responsible use of livestock grazing a s tool for finefuel reduction. The following changes will facilitate better use of free-use grazing permits and targeted grazing. Delete from 43 CFR 4131.3-1: "Permits and leases shall incorporate terms and conditions that ensure conformance with subpart 4180 of this part. Revise 43 CFR 4130.3-2 as follows: "§ 4130 Free-use grazing permits. (b) The authorized officer may also authorize free use under the following circumstances: (1) The primary objective of authorized grazing use or conservation use is the management of vegetation to meet resource objectives other than the production of livestock forage and such use is in conformance with the requirements of this part; or
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	63	Subpart 4130 - Authorizing Grazing Use	§ 4130.3-2 Other terms and conditions. OLD TEXT The authorized officer may specify in grazing permits or leases other terms and conditions which will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands. These may include but are not limited to: NEW TEXT The authorized officer may specify in grazing permits or leases other terms and conditions which will assist in achieving applicable objectives in the land use plan, provide for proper range management or assist in the orderly administration of the public rangelands. These may include but are not limited to: RATIONALE See insertions and deletions

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	66	Subpart 4130 - Authorizing Grazing Use	OLD TEXT Following consultation, cooperation, and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the active use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 4180 of this part. To the extent practical, the authorized officer shall provide to affected permittees or lessees, States having lands or responsibility for managing resources within the affected area, and the interested public an opportunity to review, comment and give input during the preparation of reports that evaluate monitoring and other data that are used as a basis for making decisions to increase or decrease grazing use, or to change the terms and conditions of a permit or lease. NEW TEXT Following consultation, cooperation, and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the interested public, the authorized officer may modify terms and conditions of the permit or lease when the ____ management practices are not meeting APPLICABLE the land use plan PT , ____ activity plan, ____ objectives, RATIONALE Comment [AS37]: This is removed because 4110.3 speaks to the rules to change Active use. Comment [AS38]: This is proposed to be removed because it is added as part of the redefined definition of "consultation, cooperation, and coordination".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	58	Subpart 4130 - Authorizing Grazing Use	OLD TEXT § 4130.2 Grazing permits or leases. (a) Grazing permits or leases shall be issued to qualified applicants to authorize use on the public lands and other lands under the administration of the Bureau of Land Management that are designated as available for livestock grazing through land use plans. Permits or leases shall specify the types and levels of use authorized, including livestock grazing, suspended use, and conservation use. These grazing permits and leases shall also specify terms and conditions pursuant to §§ 4130.3, 4130.3-1, and 4130.3-2. NEW TEXT § 4130.2 Grazing permits or leases. (a) Grazing permits or leases shall be issued to qualified applicants to authorize use on the public lands and other lands under the administration of the Bureau of Land Management that are designated as available for livestock grazing through land use plans. Permits or leases shall specify the types and levels of use authorized, including ACTIVE USE AND, suspended use, _____. These grazing permits and leases shall also specify terms and conditions pursuant to §§ 4130.3, 4130.3-1, and 4130.3-2. RATIONALE Comment [AS32]: This rule should be modified to conform to the amendments to FLPMA on December 19, 2014, 128 Stat. 3762. See Federal Land Policy and Management Act, 43 U.S.C. 1752(c))(1) and(c)(2) and (h)(1) and (i).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	42	Subpart 4130 - Authorizing Grazing Use	OLD TEXT (g) Temporary nonuse and conservation use may be approved by the authorized officer if such use is determined to be in conformance with the applicable land use plans, allotment management plan or other activity plans and the provisions of subpart 4180 of this part. (1) Conservation use may be approved for periods of up to 10 years when, in the determination of the authorized officer, the proposed use will promote rangeland resource protection or enhancement of resource values or uses, including more rapid progress toward resource condition objectives; or NEW TEXT (g) Temporary nonuse and may be approved by the authorized officer if such use is determined to be in conformance with the applicable land use plans, allotment management plan or other activity plans and the provisions of subpart 4180 of this part.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	64	Subpart 4130 - Authorizing Grazing Use	OLD TEXT (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; NEW TEXT (f) Provision for livestock grazing temporarily to be delayed, discontinued or EXTENDED to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas _____ or for the protection of other rangeland resources and values consistent with APPLICABLE objectives THE of applicable land use plan, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; RATIONALE Comment [AS34]: This rule should be amended to allow a grazing permit or lease to include a term & condition to delay or extend grazing use. Delay is commonly authorized via range readiness type of terms. In the same respects, "expend" should be added since there are reasons to temporary increase Active use or to temporary refine grazing systems to achieve certain objectives, like, for example, the periodic grazing of an enclosure to remove "wolfy" plants. See also proposed amendment 43 C.F.R. 4130.32(j). Such an added term & condition in a grazing permit or lease would also likely negate the need for BLM to process Nonrenewable Grazing Permits, assuming such a term &condition is put in a grazing permit or lease.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	48	Subpart 4130 - Authorizing Grazing Use	OLD TEXT (f) Provision for livestock grazing temporarily to be delayed, discon-tinued or modified to allow for the re-production, establishment, or restora-tion of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather condi-tions or lack of plant growth; NEW TEXT (f) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather conditions or lack of plant growth; RATIONALE How does the agency intend to determine the "vigor of plants", science has not found a way to measure this characteristic? "restoration of vigor of plants" and " proper functioning condition" statements can't be defined or measured and therefore could be abused..

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlson	James	Montana Natural Resource Coalition		1342	14	Subpart 4130 - Authorizing Grazing Use	Issue: Regulatory and programmatic distinction between grazing of domestic livestock and indigenous animals: Protection of range health, the livestock industry and local economies. Explanation: The EIS and revised regulations should codify into regulation standards and procedures for a multiple use and compatibility analysis that distinguishes domestic livestock from indigenous animals for purposes of grazing on chiefly-valuable- for-grazing district lands. The multiple use analysis must focus on the fact that initiatives that promote grazing of indigenous animals on TGA districts leads to deconstruction or removal of TGA improvements and transitions grazing allotments from multiple use to single and dominant land use. Criteria: NEPA/CEQ: 40 CFR § 1500.2. Policy - "Federal agencies shall to the fullest extent possible: ... (e) Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment. (f) Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment." 40 CFR § 1501.2. Apply NEPA early in the process - "... Each agency shall: (a) ... utilize a systematic, interdisciplinary approach which will insure the integrated use of the natural and social sciences and the environmental design arts in planning and in decisionmaking which may have an impact on man's environment ..." And, (b) Identify environmental effects and values in adequate detail so they can be compared to economic and technical analyses ... " And, 40 CFR § 1502.16 Environmental consequences - "... It shall include discussions of: (a) Direct effects and their significance ... (b) Indirect effects and their significance ... (c) Possible conflicts between the proposed action and the objectives of Federal, regional, State, and local (and in the case of a reservation, Indian tribe) land use plans, policies and controls for the area concerned ..." 43 CFR Part 4100: 43 CFR § 4100.0-5 Definitions - "Livestock or kind of livestock means species of domestic livestock-cattle, sheep, horses, burros, and goats." 43 CFR 4130.6 Other grazing authorizations - "... special grazing permits or leases have no priority for renewal and cannot be transferred or assigned." 43 CFR § 4130.6-4 - "Special grazing permits or leases authorizing grazing use by privately owned or controlled indigenous animals may be issued at the discretion of the authorized officer. This use shall be consistent with multiple-use objectives. These permits or leases shall be issued for a term deemed appropriate by the authorized officer not to exceed 10 years." TGA: 43 USC § 315. Grazing districts; establishment - "In order to promote the highest use of
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	72	Subpart 4130 - Authorizing Grazing Use	OLD TEXT Nonrenewable grazing permits or leases may be issued on an annual basis to qualified applicants when forage is temporarily available, provided this use is consistent with multiple-use objectives and does not interfere with ex-isting livestock operations on the pub-lic lands. The authorized officer shall consult, cooperate and coordinate with affected permittees or lessees, the State having lands or responsible for managing resources within the area, and the interested public prior to the issuance of nonrenewable grazing per-mits and leases. NEW TEXT Nonrenewable grazing permits or leases may be issued on an annual basis to qualified applicants when forage is temporarily available, provided this use is consistent with multiple-use objectives and does not interfere with existing livestock operations on the public lands. The authorized officer shall consult, cooperate and coordinate with affected permittees or lessees, the State having lands or responsible for managing resources within the area, and the affected interest prior to the issuance of nonrenewable grazing permits or leases.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	77	Subpart 4130 - Authorizing Grazing Use	OLD TEXT A service charge may be assessed for each crossing permit, transfer of graz-ing preference, application solely for nonuse or conservation use, and each replacement or supplemental billing notice except for actions initiated by the authorized officer. Pursuant to sec-tion 304(a) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1734(a)), calculation of the Bureau serv-ice charge assessed shall reflect proc-essing costs and shall be adjusted peri-odically as costs change. Notice of changes shall be published periodically in the FEDERAL REGISTER. [49 FR 6454, Feb. 21, 1984; 49 FR 12705, Mar. 30, 1984. Redesignated at 60 FR 9965, Feb. 22, 1995, and amended at 60 FR 9967, Feb. 22, 1995] NEW TEXT A service charge may be assessed for each crossing permit, transfer of grazing preference, application solely for nonuse or conservation use, and each replacement or supplemental billing notice except for actions initiated by the authorized officer. Pursuant to section 304(a) of the Federal Land Policy and Management Act of 1976 (43 U.S.C. 1734(a)), calculation of the Bureau service charge assessed shall reflect processing costs and shall be adjusted periodically as costs change. Notice of changes shall be published periodically in the FEDERAL REGISTER.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	73	Subpart 4130 - Authorizing Grazing Use	OLD TEXT § 4130.6-3 Crossing permits. A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public land or other land under Bureau of Land Management control, or both, with livestock for proper and lawful pur-poses. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur as deemed necessary by the authorized officer to achieve the objectives of this part. [60 FR 9967, Feb. 22, 1995] NEW TEXT DELETED OLD TEXT.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	61	Subpart 4130 - Authorizing Grazing Use	OLD TEXT § 4130.1-1 Filing applications. Applications for grazing permits or leases (active use and nonuse), free-use grazing permits and other grazing au-thorizations shall be filed with the au-thorized officer at the local Bureau of Land Management office having juris-diction over the public lands involved. [43 FR 29067, July 5, 1978, as amended at 49 FR 6453, Feb. 21, 1984. Redesignated at 60 FR 9965, Feb. 22, 1995] NEW TEXT Applications for grazing permits or leases (active grazing use and suspended use), annual grazing authorizations (active grazing use and temporary nonuse) free-use grazing permits and other grazing authorizations shall be filed with the authorized officer at the local Bureau of Land Management office having jurisdiction over the public lands or other lands administered by the Bureau of Land Management.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	66	Subpart 4130 - Authorizing Grazing Use	<p>NEW TEXT (c) Authorization to use, and directions for placement of supplemental feed, including salt, for improved live-stock and rangeland management on the public lands; (d) A requirement that permittees or lessees operating under a grazing per-mit or lease submit within 15 days after completing their annual grazing use, or as otherwise specified in the permit or lease, the actual use made; (e) The kinds of indigenous animals authorized to graze under specific terms and conditions; (f) Provision for livestock grazing temporarily to be delayed, discon-tinued or modified to allow for the re-production, establishment, or restora-tion of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils, such as where delay of spring turnout is required because of weather condi-tions or lack of plant growth; (g) The percentage of public land use determined by the proportion of live-stock forage available on public lands within the allotment compared to the total amount available from both pub-lic lands and those owned or controlled by the permittee or lessee; and (h) A statement disclosing the re-quirement that permittees or lessees shall provide reasonable administra-tive access across private and leased lands to the Bureau of Land Manage-ment for the orderly management and protection of the public lands. [49 FR 6453, Feb. 21, 1984; 49 FR 12704, Mar. 30, 1984. Redesignated at 60 FR 9965, Feb. 22, 1995, and amended at 60 FR 9966, Feb. 22, 1995] NEW TEXT (c) Authorization to use supplemental feed, including salt, for improved livestock and rangeland management on the public lands; (d) Provision for livestock grazing temporarily to be delayed, discontinued or modified to allow for the reproduction, establishment, or restoration of vigor of plants, provide for the improvement of riparian areas to achieve proper functioning condition or for the protection of other rangeland resources and values consistent with objectives of applicable land use plans, or to prevent compaction of wet soils,e) The percentage of public land use determined by the proportion of livestock forage available on public lands within the allotment compared to the Bureau of Land Management, Interior total amount available from both public lands and those owned or controlled by the permittee or lessee; (f) A statement disclosing the requirement that permittees or lessees shall provide reasonable access across private and leased lands to the Bureau of Land Management for:(i) A provision disclosing the need and requirements of trailing across public lands. (ii) A provision disclosing the criteria forage on a temporary basis due to conditions, like higher than normal forage production growth, showing forage temporarily in excess of the livestock carrying</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	67	Subpart 4130 - Authorizing Grazing Use	OLD TEXT Following consultation, cooperation, and coordination with the affected les-sees or permittees, the State having lands or responsible for managing re-sources within the area, and the inter-ested public, the authorized officer may modify terms and conditions of the permit or lease when the active use or related management practices are not meeting the land use plan, allot-ment management plan or other activ-ity plan, or management objectives, or is not in conformance with the provi-sions of subpart 4180 of this part. To the extent practical, the authorized of-ficer shall provide to affected permit-tees or lessees, States having lands or responsibility for managing resources within the affected area, and the inter-ested public an opportunity to review, comment and give input during the preparation of reports that evaluate monitoring and other data that are used as a basis for making decisions to increase or decrease grazing use, or to change the terms and conditions of a permit or lease. [60 FR 9966, Feb. 22, 1995] NEW TEXT Following consultation, cooperation and coordination with the affected lessees or permittees, the State having lands or responsible for managing resources within the area, and the affected interest, the authorized officer may modify terms and conditions of the permit or lease when the active grazing use or related management practices are not meeting the land use plan, allotment management plan or other activity plan, or management objectives, or is not in conformance with the provisions of subpart 4180. To the extent practical, the authorized officer shall provide to affected permittees or lessees, States having lands or responsibility for managing resources within the affected area, and the affected interest an opportunity to review, preparation of reports that evaluate monitoring and other data that are used as a basis for making decisions to increase or decrease grazing use, or to change the terms and conditions of a permit or lease.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	61	Subpart 4130 - Authorizing Grazing Use	§ 4130.3-1 Mandatory terms and conditions. OLD TEXT (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, for every grazing permit or lease. The authorized livestock grazing use shall not exceed the livestock carrying capacity of the allotment. NEW TEXT (a) The authorized officer shall specify the kind and number of livestock, the period(s) of use, the allotment(s) to be used, and the amount of use, in animal unit months, for every grazing permit or lease. The authorized livestock grazing use shall not exceed the ____carrying capacity FOR LIVESTOCK GRAZING of the allotment. RATIONALE See insertions and deletions
Subpart 4140 - Prohibited Acts								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Rosemary			1194	9	Subpart 4140 - Prohibited Acts	Section 4140.1 Prohibited Acts The listed prohibited acts from (2) thru (7) and (11) are acts that are frequently committed by the "public" on our allotment because of heavy use especially by OHV riders. These users have no consequences for their actions, and it has become an area of multiple-abuse. All users must be monitored, not only those with a grazing application. The local BLM agency does not monitor the damage to archeological sites by the off road usage; those with grazing permits are stringently monitored. This again is an unfair discrimination for grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	52	Subpart 4140 - Prohibited Acts	OLD TEXT The following acts are prohibited on public lands and other lands administered by the Bureau of Land Management: (a) Grazing permittees or lessees performing the following prohibited acts may be subject to civil penalties under § 4170.1: (1) Violating special terms and conditions incorporated in permits or leases; (2) Failing to make substantial grazing use as authorized for 2 consecutive fee years, but not including approved temporary nonuse, conservation use, or use temporarily suspended by the authorized officer. (3) Placing supplemental feed on these lands without authorization. (4) Failing to comply with the terms, conditions, and stipulations of cooperative range improvement agreements or range improvement permits; (5) Refusing to install, maintain, modify, or remove range improvements when so directed by the authorized officer. NEW TEXT The following acts are prohibited on public lands and other lands administered by the Bureau of Land Management: (a) Grazing permittees or lessees performing the following prohibited acts may be subject to civil penalties under § 4170.1: (1) Willful and obvious violation of special terms and conditions incorporated in permits or leases; (2) Failing to make substantial grazing use as authorized for 2 consecutive fee years, but not including approved temporary nonuse, or use temporarily suspended by the authorized officer. (3) Placing supplemental feed on these lands without authorization. (4) Failing to comply with the terms, conditions, and stipulations of cooperative range improvement agreements or range improvement permits; (5) RATIONALE Wouldn't this be part of (a)(1) or (a)(4)? The authorized officer shouldn't be able to just "direct" these actions unless they are part of an agreement or terms and conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	25	Subpart 4140 - Prohibited Acts	15) The BLM must address and respond to information provided by the public regarding grazing permit violations or significant damage to natural or cultural resources, such as riparian areas, seeps and springs and archaeological sites. BLM has failed to respond to public concerns about grazing impacts and must address these concerns. Where violations have occurred, permits should be suspended or revoked.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	74	Subpart 4140 - Prohibited Acts	OLD TEXT (1) Allowing livestock or other privately owned or controlled animals to graze on or be driven across these lands: NEW TEXT (1) UNREASONABLY Allowing livestock or other privately owned or controlled animals to graze on or be driven across these lands: RATIONALE Comment [AS41]: The word "Unreasonably" is added because BLM continues to maintain the view that a strict liability standard exists for any livestock found out of place or out of time. In other words, BLM can assess a nonwillful trespass even when some third-party opens a gate and leaves it open; allowing livestock to drift out of an authorized pasture into an unauthorized pasture. It is acknowledge that BLM may often settle such circumstances as nonwillful, nonpayment, but it is still a violation, i.e. a noncompliance. A permittee or lessee should not be subject to any noncompliance under such circumstances beyond their reasonable control, particularly when BLM can use such noncompliance as a basis for a nonrenewal of a permit or lease.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	73	Subpart 4140 - Prohibited Acts	OLD TEXT (2) Failing to make substantial grazing use as authorized for 2 consecutive fee years, but not including approved temporary nonuse, conservation use, or use temporarily suspended by the authorized officer. NEW TEXT (2) Failing to make substantial grazing use as authorized for 2 consecutive fee years, but not including approved temporary nonuse,_____, or use temporarily suspended by the authorized officer.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	56	Subpart 4140 - Prohibited Acts	OLD TEXT (c) Performance of an act listed in paragraphs (c)(1), (c)(2) or (c)(3) of this section where public land administered by the Bureau of Land Management is involved or affected, the violation is related to grazing use authorized by a permit or lease issued by the Bureau of Land Management, and the permittee or lessee has been convicted or otherwise found to be in violation of any of these laws or regulations by a court or by final determination of an agency charged with the administration of these laws or regulations, and no further appeals are outstanding, constitutes a prohibited act that may be subject to the civil penalties set forth at § 4170.1-1. NEW TEXT NONE RATIONALE Does this mean that a person convicted of a federal or state crime will also have civil penalties imposed by the BLM?
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	80	Subpart 4140 - Prohibited Acts	OLD TEXT (b) Persons performing the following prohibited acts related to rangelands shall be subject to civil and criminal penalties set forth at §§ 4170.1 and 4170.2: (1) Allowing livestock or other privately owned or controlled animals to graze NEW TEXT (b) Persons performing the following prohibited acts to civil and criminal penalties set forth at §§4170.1 and 4170.2: (1) Unreasonably allowing livestock or other privately owned or controlled animals to Bureau of Land Management, Interior graze on or be driven across these lands:
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	57	Subpart 4140 - Prohibited Acts	OLD TEXT (3) Violation of State livestock laws or regulations relating to the branding of livestock; breed, grade, and number of bulls; health and sanitation requirements; and violating State, county, or local laws regarding the stray of livestock from permitted public land grazing areas onto areas that have been formally closed to open range grazing. NEW TEXT (3) Violation of State livestock laws or regulations relating to the branding of livestock; health and sanitation requirements; and violating State, county, or local laws regarding the stray of livestock from permitted public land grazing areas onto areas that have been formally closed to open range grazing. RATIONALE Why would a State law regulate breed, grade, and number of bulls? Straying livestock can't always be controlled, especially with multiple use on these lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	79	Subpart 4140 - Prohibited Acts	OLD TEXT (2) Failing to make substantial graz-ing use as authorized for 2 consecutive fee years, but not including approved temporary nonuse, conservation use, or use temporarily suspended by the authorized officer. NEW TEXT (2) Failing to make substantial grazing use as authorized for 2 consecutive fee years, but not including approved temporary nonuse or use temporarily suspended by the authorized officer;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	55	Subpart 4140 - Prohibited Acts	OLD TEXT (10) Failing to reclaim and repair any lands, property, or resources when required by the authorized officer; NEW TEXT NONE RATIONALE Shouldn't (10) be part of (a)(1) or (a)(4)? The authorized officer shouldn't be able to just "require" these actions unless they are part of an agreement or terms and conditions.
Subpart 4150 - Unauthorized Grazing Use								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part	Goetz	Katie	New Mexico Department of Agriculture		1115	11	Subpart 4150 - Unauthorized Grazing Use	For what purposes could BLM-managed land be "disposed of" and to what purposes could BLM-managed land be "devoted" under § 4110.4-2? NMDA requests enumeration of such purposes so that permittees and lessees are aware of potential dispositions of otherwise valid permits and leases.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	28	Subpart 4150 - Unauthorized Grazing Use	Unauthorized Use, provide consistent resolution to incidental, non-willful occurrences. o Where incidental, non-willful unauthorized use occurs in association with BLM administered livestock grazing, but does not result in excessive forage utilization levels or other significant impacts to natural resources located on public land, the incidental, non-willful unauthorized use should be documented in the case files under a consistent, efficient process that does not impose punitive fees or penalties. o In cases where unauthorized use is non-willful but is not incidental because it results in excessive forage utilization levels or other significant impacts to natural resources located on public land, fees commensurate with the resource damage sustained should be imposed to incentivize corrective actions and fund restoration measures (temporary fencing to provide for adequate recovery, reseeding, etc.). o In cases where unauthorized use is willful and results in excessive forage utilization levels or other significant impacts to natural resources located on public land, punitive fees and penalties commensurate with the resource damage sustained should be imposed to abate the willful unauthorized use, incentivize corrective actions, and fund restoration measures. o In cases where willful unauthorized use occurs repeatedly, action to suspend or cancel the term grazing permit in whole or in part should be considered and imposed commensurate with the resource damage sustained.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	7	Subpart 4150 - Unauthorized Grazing Use	We are particularly concerned with this issue because we were under threat of noncompliance over alleged unauthorized use on numerous occasions with respect to our US Forest Service Allotments during the past grazing season because certain grazing units were nominally scheduled to be rested from grazing due to Lahontan Cutthroat Trout concerns despite the fact that the water and fence systems in place make it impossible to rest the scheduled grazing units and graze the others. We want to avoid the risk of such arbitrary unauthorized use traps on our BLM allotments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	13	Subpart 4150 - Unauthorized Grazing Use	Unauthorized Use, provide consistent resolution to incidental, non-willful occurrences. o Where incidental, non-willful unauthorized use occurs in association with BLM administered livestock grazing, but does not result in excessive forage utilization levels or other significant impacts to natural resources located on public land, the incidental, non-willful unauthorized use should be documented in the case files under a consistent, efficient process that does not impose punitive fees or penalties. o In cases where unauthorized use is non-willful but is not incidental because it results in excessive forage utilization levels or other significant impacts to natural resources located on public land, fees commensurate with the resource damage sustained should be imposed to incentivize corrective actions and fund restoration measures (temporary fencing to provide for adequate recovery, reseeding, etc.). o In cases where unauthorized use is willful and results in excessive forage utilization levels or other significant impacts to natural resources located on public land, punitive fees and penalties commensurate with the resource damage sustained should be imposed to abate the willful unauthorized use, incentivize corrective actions, and fund restoration measures. o In cases where willful unauthorized use occurs repeatedly, action to suspend or cancel the term grazing permit in whole or in part should be considered and imposed commensurate with the resource damage sustained.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	8	Subpart 4150 - Unauthorized Grazing Use	Unauthorized Use, provide consistent resolution to incidental, non-willful occurrences. - Where incidental, non-willful unauthorized use occurs in association with BLM administered livestock grazing, but does not result in excessive forage utilization levels or other significant impacts to natural resources located on public land, the incidental, non-willful unauthorized use should be documented in the case files under a consistent, efficient process that does not impose punitive fees or penalties.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Findling	Karl		OR	1135	1	Subpart 4150 - Unauthorized Grazing Use	Unauthorized grazing -The Public notice suggests, the BLM should adopt new regulations for informally addressing unauthorized grazing, meaning that instead of complying with existing regulations to document violations and assess penalties, the agency will likely come up with a way of hiding what it knows about grazing trespass or overuse. 1. Enforcement of non-compliance must exist to comply with law, and to discourage the "Bundy-type" mindset equating to a "no-consequences" from unauthorized grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	alexandra	Kathryn		WA	654	1	Subpart 4150 - Unauthorized Grazing Use	Unauthorized grazing – the notice suggests that the BLM should adopt new regulations for informally addressing unauthorized grazing, meaning that instead of complying with existing regulations to document violations and assess penalties, the agency will likely come up with a way of hiding what it knows about grazing trespass or overuse.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Price	Donna		WI	859	1	Subpart 4150 - Unauthorized Grazing Use	Unauthorized grazing – the notice suggests that the BLM should adopt new regulations for informally addressing unauthorized grazing, meaning that instead of complying with existing regulations to document violations and assess penalties, the agency will likely come up with a way of hiding what it knows about grazing trespass or overuse.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klingel	Jon		NM	846	6	Subpart 4150 - Unauthorized Grazing Use	Trespass livestock need to be thoroughly documented and penalties assessed. This information needs to be public and on line
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	France	Tom	National Wildlife Federation		1237	3	Subpart 4150 - Unauthorized Grazing Use	the BLM should adopt new regulations for informally addressing unauthorized grazing, including complying with existing regulations to document violations and assess penalties.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Robinson	John	Idaho Conservation League	ID	1341	11	Subpart 4150 - Unauthorized Grazing Use	the BLM has been unable to identify permittees who own these lost livestock. As such, the flow chart for assessing unauthorized use has not been implemented in most of these cases, despite significant resource damage. The BLM should keep the flow chart in place but use this opportunity to ensure that fences are properly maintained every season, that closed areas are monitored regularly for unauthorized use, that livestock are visibly branded, have large, visible ear tags, that livestock are accounted for at the end of the season, and that the permittees are responsive to BLM and public reports of unauthorized uses.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Rama			1191	1	Subpart 4150 - Unauthorized Grazing Use	People (permittees and other users) who constantly mismanaged, have no respect for their neighbor or the land and repeatedly offend should be dealt with seriously. The second point of unauthorized use, is the trailing a crossing of other permittees' allotments. Since the beginning of individual allotment, almost every permittee crosses somebody else's allotment. Most of the time they are moving from point A to point B with minimal grazing occurring. This too evens out the actual use between neighbors. Keeping track of this, again would be very time-consuming for the BLM with very little gain. Long trails and not every day occurrences, should be monitored and kept in perspective for actual use of allotments or if there is a problem or areas of concern. Also an crossing allotment and trailing usually are very different, as trailing animals for long distances mean they have to graze and those AUMs should be accounted for but not denied
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	12	Subpart 4150 - Unauthorized Grazing Use	In cases where willful unauthorized use occurs repeatedly, action to suspend or cancel the term grazing permit in whole or in part should be considered and imposed commensurate with the resource damage sustained.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	9	Subpart 4150 - Unauthorized Grazing Use	In cases where unauthorized use is non-willful but is not incidental because it results in excessive forage utilization levels or other significant impacts to natural resources located on public land, fees commensurate with the resource damage sustained should be imposed to incentivize corrective actions and fund restoration measures (temporary fencing to provide for adequate recovery, reseeding, etc.).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	8	Subpart 4150 - Unauthorized Grazing Use	In cases where unauthorized use is non-willful but is not incidental because it results in excessive forage utilization levels or other significant impacts to natural resources located on public land, fees commensurate with the resource damage sustained should be imposed to incentivize corrective actions and fund restoration measures (temporary fencing to provide for adequate recovery, reseeding, etc.). -In cases where unauthorized use is willful and results in excessive forage utilization levels or other significant impacts to natural resources located on public land, punitive fees and penalties commensurate with the resource damage sustained should be imposed to abate the willful unauthorized use, incentivize corrective actions, and fund restoration measures. -In cases where willful unauthorized use occurs repeatedly, action to suspend or cancel the term grazing permit in whole or in part should be considered and imposed commensurate with the resource damage sustained
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wardlaw	Tricia		OR	976	2	Subpart 4150 - Unauthorized Grazing Use	I'm very worried that the BLM could adopt new regulations for informally addressing unauthorized grazing, meaning that instead of complying with existing regulations to document violations and assess penalties, the BLM will come up with a way of hiding what it knows about grazing trespass or overuse, including within designated Wilderness.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Whyde	Don		WY	873	1	Subpart 4150 - Unauthorized Grazing Use	I do think that a permittee that deliberately grazes livestock outside the bounds of a permit and does so continuously has to be administratively dealt with. The BLM cannot just look the other way. If it is willful and continuous, cancel the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fears	Derek		FL	974	1	Subpart 4150 - Unauthorized Grazing Use	I am concerned that the proposed revision will make it very difficulty to monitor unauthorized grazing and its impact on the ecosystem overall.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Tammy			1137	10	Subpart 4150 - Unauthorized Grazing Use	Clarify what constitutes a nonwillful, incidental trespass and provide an informal way to correct the situation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	43	Subpart 4150 - Unauthorized Grazing Use	At 4150, Unauthorized grazing use: The WSGB comments in response to the 2016 GAO Report on this subject, that the BLM Grazing Regulations at Section 4150 include language that gives the AO the authority to accept labor and/or materials from permittees adjudicated as having committed non-wilfull, unauthorized grazing use towards the construction of range improvements that contribute to the resolution of issues identified by the AO as part of the informal resolution of violations of Section 4150 at the local level.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Correll	Leanne	SER Conservation District	WY	1066	12	Subpart 4150 - Unauthorized Grazing Use	4150.1 - Unauthorized Grazing Use - Violations. This section needs changes and clarification to include less formal actions when a potential violation is determined as incidental and non-willful. Outcomes would be more productive if communication occurred between the Authorized Officer and permittee or lessee to resolve the potential violation before escalating to the violations in sub-part (b).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Shephard	Ed	Public Lands Foundation		1128	6	Subpart 4150 - Unauthorized Grazing Use	Unauthorized use Issues identified in the GAO Report on grazing trespass needs to be addressed along with the authority that the Department of Justice can sue prior to impoundment. Establishing procedures for resolving incidental use while ensuring all discovered unauthorized use is documented is needed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carter	Susan		NM	849	4	Subpart 4150 - Unauthorized Grazing Use	Unauthorized Grazing must be prosecuted and not addressed "informally."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klitz	Karen			1449	1	Subpart 4150 - Unauthorized Grazing Use	Unauthorized grazing [in excess of permitted numbers and outside the permitted season of use] is a massive problem because little or no enforcement at present [Unauthorized grazing: actions needed to improve tracking and deterrence efforts . GAO. 2016]. I've reported many trespassing cattle. Fines, if levied at all, are laughably tiny, and the trespass may not even be reported.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	44	Subpart 4150 - Unauthorized Grazing Use	The WSGB also comments that the AO should be provided the Regulatory authority to determine, and count towards a the informal resolution of a non-willful, unauthorized grazing use, the value to the BLM and/or general public of public services such as litter control, reporting to the BLM of resource damage locations from public abuse of Federal lands, fire suppression efforts, reporting habitat locations of wildlife species of importance to the Government, improved health of Federal rangelands due to good livestock management and overall stewardship of Federal resources, excess horse locations and impacts of excess horses on Federal resources, etc.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	14	Subpart 4150 - Unauthorized Grazing Use	In addition, documentation (even warnings) is a critical component when circumstances could potentially escalate, and legal steps are taken as corrective action. Documentation is critical to assessment of damage and helps with future planning for corrective action and problem solving. Clear documentation would establish additional accountability by showing a clear progression so that the accumulation of multiple warnings would move into corrective action on the violation
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Atkinson	Susan		CO	633	2	Subpart 4150 - Unauthorized Grazing Use	Allow unauthorized grazing – the notice suggests that the BLM should adopt new regulations for informally addressing unauthorized grazing, meaning that instead of complying with existing regulations to document violations and assess penalties, the agency will likely come up with a way of hiding what it knows about grazing trespass or overuse.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	10	Subpart 4150 - Unauthorized Grazing Use	* Unauthorized Use, provide consistent resolution to incidental, non-willful occurrences. o Where incidental, non-willful unauthorized use occurs in association with BLM administered livestock grazing, but does not result in excessive forage utilization levels or other significant impacts to natural resources located on public land, the incidental, non-willful unauthorized use should be documented in the case files under a consistent, efficient process that does not impose punitive fees or penalties. o In cases where unauthorized use is non-willful but is not incidental because it results in excessive forage utilization levels or other significant impacts to natural resources located on public land, fees commensurate with the resource damage sustained should be imposed to incentivize corrective actions and fund restoration measures (temporary fencing to provide for adequate recovery, reseeding, etc.). o In cases where unauthorized use is willful and results in excessive forage utilization levels or other significant impacts to natural resources located on public land, punitive fees and penalties commensurate with the resource damage sustained should be imposed to abate the willful unauthorized use, incentivize corrective actions, and fund restoration measures. o In cases where willful unauthorized use occurs repeatedly, action to suspend or cancel the term grazing permit in whole or in part should be considered and imposed commensurate with the resource damage sustained.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	1	Subpart 4150 - Unauthorized Grazing Use	-We believe that the regulation changes should provide for evaluation of the on-the-ground circumstances and difficult to control drifting of livestock from one grazing allotment to another should be recorded in the tracking process to be used. Based on the conditions where difficult to control drifting is identified, the determination should be that the unauthorized grazing is "non-willful" and there should not be penalties assessed on livestock owners for unintentional livestock trespass. -An evaluation should be made on whether fencing, which prevents unauthorized grazing from taking place, meets the state's fencing law and whether alternatives to state fencing law standards (such as wildlife friendly fencing) are deterrents to livestock from entering areas where they don't belong.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris			1188	6	Subpart 4150 - Unauthorized Grazing Use	UNAUTHORIZED USE - There will always be good and bad operators, but currently the Agency seem to focus on only a few operators and hand down tough penalties while leaving others completely alone. Incidental and unintentional trespass can happen and shouldn't automatically result in fines. Maybe a board made up of operators and Agency staff could resolve these issues. Also, Agency must be held to account when they DO NOT replace fence etc destroyed by major wildfire. Permittees cannot be held responsible when the Agency does not rebuild infrastructure.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris	Ninety-Six Ranch LLC		1285	7	Subpart 4150 - Unauthorized Grazing Use	UNAUTHORIZED USE - There will always be good and bad operators, but currently the Agency seem to focus on only a few operators and hand down tough penalties while leaving others completely alone. Incidental and unintentional trespass can happen and shouldn't automatically result in fines. Maybe a board made up of operators and Agency staff could resolve these issues. Also, Agency must be held to account when they DO NOT replace fence etc destroyed by major wildfire. Permittees cannot be held responsible when the Agency does not rebuild infrastructure.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	21	Subpart 4150 - Unauthorized Grazing Use	Unauthorized grazing -the EIS scoping notice suggests that the BLM should adopt new regulations for informally addressing unauthorized grazing, meaning that instead of complying with existing regulations to document violations and assess penalties, the agency will likely come up with a way of hiding what it knows about grazing trespass or overuse
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hutter	Fairfax		NJ	1001	1	Subpart 4150 - Unauthorized Grazing Use	Unauthorized grazing – the notice suggests that the BLM should adopt new regulations for informally addressing unauthorized grazing, meaning that instead of complying with existing regulations to document violations and assess penalties, the agency will likely come up with a way of hiding what it knows about grazing trespass or overuse.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Laurie		NM	1374	7	Subpart 4150 - Unauthorized Grazing Use	To improve the effectiveness of BLM's efforts to track and deter unauthorized grazing, we recommend that the Secretary of the Interior direct the Director of BLM to take the following three actions: * amend the regulations on unauthorized grazing use-43 C.F.R. Subpart 4150 (2005)-to establish a procedure for the informal resolution of violations at the local level, or follow the existing regulations by sending a notice of unauthorized use for each potential violation as provided by 43 C.F.R. § 4150.2(a) (2005); * record all incidents of unauthorized grazing, including those resolved informally; and* revise the agency's Unauthorized Grazing Use Handbook to make it consistent with 43 C.F.R. pt. 4100 (2005

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	France	Tom	National Wildlife Federation		1237	1	Subpart 4150 - Unauthorized Grazing Use	The GAO report concludes that the BLM should updates its regulations to allow for informal resolutions to non-willful violations of the grazing regulations.1 The scoping document did not make a distinction between willful and non-willful violations.2 NWF encourages BLM to ensure the new regulations accurately reflect GAO's recommendations in resolving only non-willful violations informally. The GAO report also notes the importance of documenting all incidents of unauthorized grazing in order that "the agency has complete information on the extent and frequency of unauthorized grazing for tracking patterns of any potential repeat offenders."3 NWF encourages BLM to include in its regulations a process for documenting unauthorized grazing. [1https://www.gao.gov/assets/680/678292.pdf at 30; 2 See 85 Fed. Reg. 3410; 3 GAO Report at 31]
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	12	Subpart 4150 - Unauthorized Grazing Use	Subpart 4150 Unauthorized Grazing Use The current regulations direct determination as to whether a violator is 'non-willful', 'willful' or 'repeated willful'. The EIS should provide criteria to guide determinations of whether the unauthorized grazing is 'non-willful' or 'willful'. Further, if the determination is made that the unauthorized grazing is 'willful' the criteria should spell out when ;repeated willful' has occurred. An assessment should be made on whether fencing meets the state's fencing law or is a commonly accepted fence, and whether alternatives to state fencing law standards (such as wildlife friendly fencing) are deterrents to livestock. We believe that the regulations should provide for evaluation of on-the-ground circumstances. Two examples of this are 1. 'Act of God' such as a natural disaster (tornado, mud slide, sever blizzard, etc.) 2. Situations out of the permittees control - such elk tearing down a fence, especially if it is in an area where it is difficult to find. These should be classified as 'non willful' and carry no penalty. Adding phrasing such as "or instances beyond their control" may address such situations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	13	Subpart 4150 - Unauthorized Grazing Use	Subpart 4150 Unauthorized Grazing Use The current regulations direct determination as to whether a violator is 'non-willful', 'willful' or 'repeated willful'. The EIS should provide criteria to guide determinations of whether the unauthorized grazing is 'non-willful' or 'willful'. Further, if the determination is made that the unauthorized grazing is 'willful' the criteria should spell out when ;repeated willful' has occurred. An assessment should be made on whether fencing meets the state's fencing law or is a commonly accepted fence, and whether alternatives to state fencing law standards (such as wildlife friendly fencing) are deterrents to livestock. We believe that the regulations should provide for evaluation of on-the-ground circumstances. Two examples of this are 1. 'Act of God' such as a natural disaster (tornado, mud slide, sever blizzard, etc.) 2. Situations out of the permittees control - such elk tearing down a fence, especially if it is in an area where it is difficult to find. These should be classified as 'non willful' and carry no penalty. Adding phrasing such as "or instances beyond their control" may address such situations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Rama			1191	1	Subpart 4150 - Unauthorized Grazing Use	One of the main issues we face is unauthorized use.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	76	Subpart 4150 - Unauthorized Grazing Use	OLD TEXT (a) For nonwillful violations: The value of forage consumed as determined by the average monthly rate per AUM for pasturing livestock on privately owned land (excluding irrigated land) in each State as published annually by the Department of Agriculture. The authorized officer may approve nonmonetary settlement of unauthorized use only when the authorized officer determines that each of the following conditions is satisfied: (1) Evidence shows that the unauthorized use occurred through no fault of the livestock operator; (2) The forage use is insignificant; (3) The public lands have not been damaged; and (4) Nonmonetary settlement is in the best interest of the United States. (b) For willful violations: Twice the value of forage consumed as determined in paragraph (a) of this section. (c) For repeated willful violations: Three times the value of the forage consumed as determined in paragraph (a) of this section. (d) Payment made under this section does not relieve the alleged violator of any criminal liability under Federal or State law. NEW TEXT For nonwillful violations: The value of forage consumed as determined by the average monthly rate per AUM for pasturing livestock on privately owned land (excluding irrigated land) in each State as published annually by the Department of Agriculture. (b) For willful violations: Twice the value of forage consumed as determined in paragraph (a) of this section. (c) For repeated willful violations: Three times the value of the forage consumed as determined in paragraph (a) of this section. (d) Payment made under this section does not relieve the alleged violator of any criminal liability under Federal or State law. RATIONALE Comment [AS42]: This should be removed should BLM not add the word "Unreasonably" to Section 4140.1(b)(1), as discussed above. Otherwise, this rule should remain with the added provision that such type of nonwillful, nonpayment settlements will not be considered noncompliance for purposes of renewal of a permit or lease.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klitz	Karen			1449	3	Subpart 4150 - Unauthorized Grazing Use	Grazing in excess of permitted livestock numbers and grazing outside the permitted season of use should be sufficient grounds for denail of a grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	16	Subpart 4150 - Unauthorized Grazing Use	BLM's notice indicates it may consider how to address findings in the Government Accountability Office's (GAO) July 2016 report, "Unauthorized Grazing: Actions Needed to Improve Tracking and Deterrence Efforts." 85 Fed. Reg. 3411. BLM should heed the GAO's recommendation to "follow the existing regulations by sending a notice of unauthorized use for each potential violation as provided by 43 C.F.R. § 4150.2(a) (2005)." GAO 2016 at 31. Enforcement of existing regulations, including documenting violations and assessing penalties to discourage and prevent unauthorized grazing practices, would provide a transparent, regulatory and accountable framework for tracking and addressing grazing violations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	8	Subpart 4150 - Unauthorized Grazing Use	B. The proposed regulation should reflect emerging concerns regarding conflicting land use paradigms between users to avoid violent confrontation. The BLM should adopt grazing regulations that properly address and deter unauthorized grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	42	Subpart 4150 - Unauthorized Grazing Use	At 4150, Unauthorized grazing use: The WSGB comments in response to the 2016 GAO Report on this subject, that the BLM Grazing Regulations at Section 4150 include language that gives the AO the authority to accept labor and/or materials from permittees adjudicated as having committed non-wilfull, unauthorized grazing use towards the construction of range improvements that contribute to the resolution of issues identified by the AO as part of the informal resolution of violations of Section 4150 at the local level.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	12	Subpart 4150 - Unauthorized Grazing Use	All unauthorized use, willful or non-willful, should have the same documentation by the BLM. Consistent record keeping allows for review of patterns and opens the door for corrective action as needed. With employee movement and turn over within the BLM, consistent record keeping will also provide a history that easily transfers from one manager to another.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miyamoto	Doug	Wyoming Department of Agriculture	WY	910	10	Subpart 4150 - Unauthorized Grazing Use	4150.1- Unauthorized Grazing Use-Violations: -This section needs updated and changed to determine the appropriate path forward when a potential violation Is determined as incidental and non-wilful. Currently, the regulations do not direct the authorized officer to work with the permittees or lessees. Non-wilful and Incidental use should not go directly to the violations In su~art (b), but Instead provide ilxlbltly and allow corrective actions between the Authorized Offlcer and permittees or lessees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	36	Subpart 4150 - Unauthorized Grazing Use	4150 Unauthorized Grazing Use - All references to impoundment and disposal or other similar actions by BLM relative to unauthorized grazing use should be deleted and replaced with instruction that any action for unauthorized grazing use will be carried out in cooperation with, and under the authority of the county sheriff utilizing the laws of the State involved.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	5	Subpart 4150 - Unauthorized Grazing Use	4.The EIS should address how the BLM intends to address unauthorized grazing, and how that will affect the health, diversity and productivity of our public lands. The current regulations requiring documentation of grazing violations and assessment of penalties should not be replaced by a system in which all violations are addressed by informal consultation - this cuts the public out of the discussion and provides no incentive for livestock producers to comply with the BLM's grazing rules regarding trespass and overuse. In addition unauthorized grazing can damage riparian areas and degrade water quality; the BLM needs to demonstrate how the new regulations would avoid these impacts.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	6	Subpart 4150 - Unauthorized Grazing Use	4. Subpart 4150 Unauthorized Grazing Use Revisio1l -All references to Impoundment and disposal or other actions by BLM relative to unauthorized grazing use should be deleted and notice given that any such action would be carried out in accordance with the laws of the State involved.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nagel	Clinton	Gallatin Wildlife Association	MT	949	14	Subpart 4150 - Unauthorized Grazing Use	14. unauthorized grazing. This practice must be stopped. It strictly enhances the abuse and overuse of the resource. Why would BLM look at ways to hide such actions? This speaks to the corruption and "to close connection" that BLM has to the livestock community. Unauthorized grazing must be documented and penalized.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmuth	Peter		CO	1050	1	Subpart 4150 - Unauthorized Grazing Use	Unauthorized grazing - should be punishable to the fullest extent of the law just as any other violation on public land would be
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	9	Subpart 4150 - Unauthorized Grazing Use	"It's clear that the Malheur occupiers illegally seized and destroyed federal land, not as a peaceful protest, but as a willful and premeditated act of domestic terrorism," said Oregon Rep. Peter DeFazio regarding one such incident. This incident included the armed occupation of a federal building with premeditated and consistent efforts to intimidate, harass, and threaten local law enforcement as well as local residents.13 13 Sophie Peel. New Report on 2016 Malheur Occupation Says Right-Wing Washington State Lawmaker Helped the Bundy's Plan It, WILLAMETTE WEEK (Dec. 21, 2019), https://www.wweek.com/news/state/2019/12/21/new-reporton-2016-malheur-occupation-says-right-wing-washington-state-lawmaker-helped-the-bundys-plan-it/ .
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	77	Subpart 4150 - Unauthorized Grazing Use	OLD TEXT (e) Violators shall not be authorized to make grazing use on the public lands administered by the Bureau of Land Management until any amount found to be due the United States under this section has been paid. The authorized officer may take action under § 4160-1 of this title to cancel or suspend grazing authorizations or to deny approval of applications for grazing use until such amounts have been paid. The proposed decision shall include a demand for payment. NEW TEXT (e) Violators shall not be authorized to make grazing use on the public lands administered by the Bureau of Land Management until any amount found to be due the United States under this section has been paid. The authorized officer may take action under § 4160-1 of this title to cancel or suspend grazing authorizations or to deny approval of applications for grazing use until such amounts have been paid. The proposed decision shall include a demand for payment. However, the authorized officer may not withhold issuance any grazing use authorized under a grazing permit or lease absence issue of a decision in accordance subpart 4160 and absence the effectiveness of the decision. RATIONALE Comment [AS43]: This amendment is necessary because often times BLM will assess a claim of nonwillful or willful trespass that is contested by the permittee or lessee, but yet BLM refuses (either intentionally or unintentionally) to issue a decision adjudicating such claim. BLM will then wait to the beginning of the grazing season to leverage the permittee or lessee to pay; forcing the permittee or lessee to pay for a claim of trespass that the permittee or lessee contests.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlson	James	Montana Natural Resource Coalition		1342	16	Subpart 4150 - Unauthorized Grazing Use	Issue: Procedures for informal resolution of unauthorized grazing at the local level. Explanation: In a 2016 report, the General Accounting Office (GAO) published findings of the BLM's practice of resolving incidental nonwillful unauthorized grazing events at the local level. There is, however, no established procedure in 43 CFR Part 4100 for informal resolution. GAO recommended that Subpart 4150 be amended to include procedures for consistent resolution and recordkeeping at the field office level. GAO also recommended improved recordkeeping for unauthorized grazing and revision of BLM's Unauthorized Grazing Use Handbook to ensure consistency. EIS Alternatives should include opportunities for grazing district boards to manage local informal resolution programs. Criteria: NEPA/CEQ: 42 USC § 4321 Congressional declaration of purpose - "... To declare a national policy which will encourage productive and enjoyable harmony between man and his environment ..." 40 CFR § 1500.2 Policy - "Federal agencies shall to the fullest extent possible: ... (e) Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will minimize adverse effects of these actions upon the quality of the human environment. (f) Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment." 43 CFR Part 4100: 43 CFR § 4150 Unauthorized Grazing Use - 43 CFR 4150.2(b) - "Whenever a violation has been determined to be nonwillful and incidental, the authorized officer shall notify the alleged violator that the violation must be corrected, and how it can be settled, based upon the discretion of the authorized officer." TGA: 43 USC § 315a "The Secretary of the Interior shall make provision for the protection, administration, regulation, and improvement of ... grazing districts ... to regulate their occupancy and use ... to provide for the orderly use ... of the range." PRIA: FLMPA: 43 USC § 1752(a) Terms and Conditions "... the authority of the Secretary concerned to cancel, suspend, or modify a grazing permit or lease, in whole or in part, pursuant to the terms and conditions thereof, or to cancel or suspend a grazing permit or lease for any violation of a grazing regulation or of any term or condition of such grazing permit or lease." Other: GAO-16-559 Unauthorized Grazing Actions Needed to Improve Tracking and Deterrence Efforts - "To improve the effectiveness of BLM's efforts to track and deter unauthorized grazing, we recommend that the Secretary of the Interior direct the Director of BLM to take the following three actions: * Amend the regulations on unauthorized grazing use- 43 CFR Subpart 4150 (2005)-to establish a procedure for the informal
Subpart 4160 - Administrative Remedies								

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	61	Subpart 4160 - Administrative Remedies	OLD TEXT: § 4160.1 Proposed decisions. (a) Proposed decisions shall be served on any affected applicant, permittee or lessee, and any agent and lien holder of record, who is affected by proposed actions, terms or conditions, or modification relating to applications, permits and agreements (including range improvement permits) or leases, by certified mail or personal delivery. Copies of proposed decisions shall also be sent to the interested public. NEW TEXT [changing "the interested public" to "affected interest"]: §4160.1 Proposed decisions. (a) Proposed decisions shall be served on any affected applicant, permittee or lessee, and any agent and lien holder of record, who is affected by proposed actions, terms or conditions, or modification relating to applications, permits and agreements (including range improvement permits) or leases, by certified mail or personal delivery. Copies of proposed decisions shall also be sent to affected interests. (b) Proposed decisions shall state the reasons for the action and shall reference the pertinent terms, conditions and the provisions of applicable regulations. As appropriate, decisions shall state the alleged violations of specific terms and conditions and provisions of these regulations alleged to have been violated, and shall state the amount due under §4130.8 and §4150.3 and the action to be taken under §4170.1. (c) The authorized officer may elect not issue a proposed decision prior to a final decision where the authorized officer has made a determination in accordance with §4110.3-3(b) or § 4150.2 (d) of this part. 60 FR 9968, Feb. 22, 1995 COMMENTER RECOMMENDS ADDITION OF 4160.1-1 AND 4160.1-2, NEW TEXT: 4160.1-1 Proposed decisions on permits or leases In the absence of a documented agreement between the authorized officer and the permittee(s) or lessee(s), the authorized officer shall serve a proposed decision on any applicant, permittee or lessee, or the agent of record, or both, who is affected by the proposed action on applications for permits (including range improvement permits) or leases by certified mail or personal delivery. The authorized officer shall also send copies to other affected interests. The proposed decision shall state the reasons for the action, including reference to pertinent terms, conditions and/or provisions of these regulations, and shall provide for a period of 15 days after the receipt for the filing of a protest. 4160.1-2 Proposed decisions on alleged violations If the authorized officer determines that a permittee or lessee appears to have violated any provision of this part he/she shall serve a proposed decision on the permittee or lessee, or his agent, or both, by certified mail or personal delivery. The proposed decision shall state the alleged violations and refer to specific terms, conditions, and/or provisions of these regulations alleged to have been violated and the reasons for the proposed decision. As applicable, the
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Pullman	Susan		MT	1418	1	Subpart 4160 - Administrative Remedies	One item that I feel is important to keep in these regs are 4160.2 Protests. This allows a permittee the right to protest a proposed decision under 4160.1 to the authorized officer within 15 days. This allows ranchers a chance to have a voice. This should be allowed to remain in effect
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cascade	Robyn	Great Old Broads for Wilderness; Northern San Juan chapter	CO	1102	8	Subpart 4160 - Administrative Remedies	Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	33	Subpart 4160 - Administrative Remedies	At 4160.3, Final Decisions: The WSGB comments and request a change in this Section so that a BLM Grazing Decision is stayed during an Appeal by a Section 3 permittee.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	65	Subpart 4160 - Administrative Remedies	OLD TEXT: §4160.4 Appeals. Any person whose interest is adversely affected by a final decision of the authorized officer may appeal the decision for the purpose of a hearing before an administrative law judge by following the requirements set out in §4.470 of this title As stated in that part, the appeal must be filed within 30 days after the date the proposed decision becomes final as provided in 4160.3(a). Appeals and petitions for a stay of the decision shall be filed at the office of the authorized officer. The authorized officer shall promptly transmit the appeal and petition for stay and the accompanying administrative record to ensure their timely arrival at the appropriate Office of Hearings and Appeals. NEW TEXT [adding "by filing his/her notice of appeal in the office of the authorized officer"]: §4160.4 Appeals. Any person whose interest is adversely affected by a final decision of the authorized officer may appeal the decision for the purpose of a hearing before an administrative law judge by following the requirements set out in §4.470 of this title by filing his/her notice of appeal in the office of the authorized officer. As stated in that part, the appeal must be filed within 30 days after the date the proposed decision becomes final as provided in 4160.3(a). Appeals and petitions for a stay of the decision shall be filed at the office of the authorized officer. The authorized officer shall promptly transmit the appeal and petition for stay and the accompanying administrative record to ensure their timely arrival at the appropriate Office of Hearings and Appeals.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	63	Subpart 4160 - Administrative Remedies	OLD TEXT: §4160.3 Final decisions. (a) In the absence of a protest, the proposed decision will become the final decision of the authorized officer without further notice unless otherwise provided in the proposed decision. (b) Upon the timely filing of a protest, the authorized officer shall reconsider his proposed decision in light of the protestant's statement of reasons for protest and in light of other information pertinent to the case At the conclusion to his review of the protest, the authorized officer shall serve his final decision on the protestant or his agent, or both. and the interested public. NEW TEXT [adding "within 60 days" and removing "and the interested public"]: §4160.3 Final decisions. (a) In the absence of a protest, the proposed decision will become the final decision of the authorized officer without further notice unless otherwise provided in the proposed decision. (b) Upon the timely filing of a protest, the authorized officer shall reconsider his proposed decision in light of the protestant's statement of reasons for protest and in light of other information pertinent to the case within 60 days. At the conclusion to his review of the protest, the authorized officer shall serve his final decision on the protestant or his agent, or both. RATIONALE: Comment: Timing can be critical in some situations when livestock are involved.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	62	Subpart 4160 - Administrative Remedies	OLD TEXT: § 4160.2 Protests. Any applicant, permittee, lessee or other interested public may protest the proposed decision under §4160.1 of this title in person or in writing to the authorized officer within 15 days after receipt of such decision. NEW TEXT [changing "the interested public" to "affected interest"]: § 4160.2 Protests. Any applicant, permittee, lessee or other affected interests may protest the proposed decision under §4160.1 of this title in person or in writing to the authorized officer within 15 days after receipt of such decision. [47 FR 41713, Sept. 21, 1982, as amended at 49 FR 6455, Feb. 21, 1984; 61 FR 4227, Feb. 5, 1996]

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	64	Subpart 4160 - Administrative Remedies	<p>NEW TEXT: (c) A period of 30 days following receipt of the final decision, or 30 days after the date the proposed decision becomes final as provided in paragraph (a) of the section, is provided for filing an appeal and petition for stay of decision pending final determination on appeal. A decision will not be effective during the 30-day appeal period, except as provided in paragraph (f) of this section. See § 4.21 and § 4.470 of this title for general provisions of the appeal and stay process. (d) When the Office of Hearings and Appeals stays a final decision of the authorized officer regarding an application for grazing authorization, an applicant who was granted grazing use in the preceding year may continue at that level of authorized grazing use during the time the decision is stayed, except where grazing use in the preceding year was authorized on a temporary basis under § 4110.3-1 (a). Where an applicant had no authorized grazing use during the previous year, or the application is for designated ephemeral or annual rangeland grazing use, the authorized grazing use shall be consistent with the decision pending the Office of Hearings and Appeals final determination on the appeal. (e) When the Office of Hearings and Appeals stays a final decision of the authorized officer to change the authorized grazing use, the grazing use authorized to the permittee or lessee during the time that the decision is stayed shall not exceed the permittees or lessees authorized use in the last year during which any use was authorized. (f) Notwithstanding the provisions of § 4.21 (a) of the title pertaining to the period which a final decision will not be in effect, the authorized officer may provide that the final decision shall be effective upon issuance or on a date established in the decision and shall remain in effect pending the decision on appeal unless a stay is granted by the office of Hearings and Appeals when the authorized officer has made a determination in accordance with § 4110.3-3(b) or § 4150.2(d.. Nothing in this section shall affect the authority of the of the Director of the Hearings and Appeals or the Interior Board of Land Appeals to place decisions in full force and effect as provided in § 4.21(a)(1) of this title. NEW TEXT [changing "authorized use" to "active use"]:</p> <p>(c) A period of 30 days following receipt of the final decision, or 30 days after the date the proposed decision becomes final as provided in paragraph (a) of the section, is provided for filing an appeal and petition for stay of decision pending final determination on appeal. A decision will not be effective during the 30-day appeal period, except as provided in paragraph (f) of this section. See § 4.21 and § 4.470 of this title for general provisions of the appeal and stay process. (d) When the Office of Hearings and Appeals stays a final decision of the authorized officer regarding an application for grazing authorization, an applicant who was granted grazing use in</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goetz	Katie	New Mexico Department of Agriculture		1115	4	Subpart 4160 - Administrative Remedies	<p>In § 4160.1, proposed application, permit, agreement, and lease decisions are to be made known to applicants, permittees, and lessees (or their agents) "by certified mail or personal delivery." NMDA requests that electronic delivery be recognized as another means for communicating such information if the applicant, permittee, or lessee so chooses.</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	5	Subpart 4160 - Administrative Remedies	<p>Eliminating protest and updating "interested public" should be a priority in the new rules and written in a way that limits the public appeals process is available to only those requesting or participating in the AO or who have provided comments on the adoption or renewal of an allotment management plan.</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	10	Subpart 4160 - Administrative Remedies	4160.2 - Protests Rationale This provision should also be revised to clarify that only the decisions identified require a proposed decision and protest.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	9	Subpart 4160 - Administrative Remedies	4160.1 - Proposed Decision Rationale This provision should be revised to clarify exactly what decisions require a proposed decision and which decisions are exempted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT			22	Subpart 4160 - Administrative Remedies	(a) Proposed decisions shall be served on any interested applicant, permittee or lessee, and any agent and lien holder of record, who is affected by the proposed actions, terms or conditions, or modifications relating to applications, permits and agreements (including range improvement permits) or leases, by certified mail or personal delivery. Copies of proposed decisions shall also be sent to the interested public. (b) Proposed decisions shall state the reasons for the action and shall reference the pertinent terms, conditions and the provisions of applicable regulations. As appropriate, decisions shall state the alleged violations of specific terms and conditions and provisions of these regulations alleged to have been violated, and shall state the amount due under §§ 4130.8 and 4150.3 and the action to be taken under § 4170.1. (c) The authorized officer may elect not to issue a proposed decision prior to a final decision where the authorized officer has made a determination in accordance with § 4110.3-3(b) or § 41s0.2(d). [60 FR 9968, Feb. 22, 1995) § 4160.2Protests. Any applicant, permittee, lessee or other interested public may protest the proposed decision under § 4160.1 of this title in person or in writing to the authorized officer within 15 days after receipt of such decision. [47 FR 41713, Sept. 21, 1982, as amended at 49 FR 6455, Feb. 21, 1984; 61 FR 4227, Feb. 5, 1996) § 4160.3Final decisions. (a) In the absence of a protest, the proposed decision will become the final decision of the authorized officer without further notice unless otherwise provided in the proposed decision. (b) Upon the timely filing of a protest, the authorized officer shall reconsider her/his proposed decision in light of the protestant's statement of reasons for protest and in light of other information pertinent to the case. At the conclusion to her/his review of the protest, the authorized officer shall serve her/his final decision on the protestant or her/his agent, or both, and the interested public. (c) A period of 30 days following receipt of the final decision, or 30 days after the date the proposed decision becomes final as provided in paragraph (a) of this section, is provided for filing an appeal and petition for stay of the decision pending final determination on appeal. A decision will not be effective during the 30-day appeal period, except as provided in paragraph (f) of this section. See §§ 4.21 and 4.470 of this title for general provisions of the appeal and stay processes. (d) When the Office of Hearings and Appeals stays a final decision of the authorized officer regarding an application for grazing authorization, an applicant who was granted grazing use in the preceding year may continue at that level of authorized grazing use during the time the decision is stayed, except where grazing use in the preceding year was authorized on a temporary basis under § 4110.3-1(a). Where an applicant had no authorized grazing use during the previous year, or the

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	32	Subpart 4160 - Administrative Remedies	The OCA believes that BLM is providing administrative remedies to challenge too many BLM actions. This keeps BLM from achieving its statutory duties under the Taylor Grazing Act, the Public Rangelands Improvement Act, and the Federal Land Policy and Management Act.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Daniels	Shannon		MI	22	2	Subpart 4160 - Administrative Remedies	Streamlining protests and appeals – This reduces timelines for public involvement, increase or codify exhaustion requirements, and to further limit opportunities for public comment.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	5	Subpart 4160 - Administrative Remedies	Regulation 43 C.F.R. § 4160.1(a) provides that "[p]roposed decisions" by BLM concerning authorized grazing on the public lands "shall be served on any affected applicant, permittee or lessee, and any agent and lien holder of record . . . by certified mail or personal delivery." According to the regulation, if the decision affects any authorization of grazing on public lands, BLM must issue a proposed decision and a protest opportunity. 43 C.F.R. §§ 4110, 4120, 4130, and 4160 require the BLM to "consult with affected parties, issue a proposed decision, consider any protests, and turn the proposed decision into a final decision." Idaho Watersheds Project v. Hahn, 187 F.3d 1035, 1036 (9th Cir. 1999). The Coalition and Counties believe that several provisions could, and should, be excluded from the proposed decision and protest period framework to improve efficiency and management flexibility.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris	Ninety-Six Ranch LLC		1285	1	Subpart 4160 - Administrative Remedies	PERMIT AND LEASE RENEWALS -I would like to streamline permitting and renewal of BLM grazing permits, but I recognize the elimination of protest periods as a double edged sword. Not only would interested groups like (Western Watersheds, USHS, etc) lose the right to protest, but ranchers themselves would lose this essential right. If terms are not fair and science based, permit holders must retain the right to protest. Further permits should be available for more than 10 year renewals. 20-30 year renewals make far more sense in that much of the western landscape is threatened by wildfire and additional livestock grazing is required to reduce dangerous fuel loads. The only way most ranchers will be able to keep and stock additional livestock on the federal permits is by borrowing in order to do so. 10 years or less of permit surety is not enough to guarantee time for repayment of loans.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bellwood	Samantha	Nevada Department of Agriculture	NV	1009	7	Subpart 4160 - Administrative Remedies	-CFR 4160.2 - Protests: NDA supports the streamlining of the permit/lease renewal process by eliminating the protest portion of the decision-making process. Currently, the renewal requires a Proposed Decision and protest period. The BLM should take advantage of existing coordination and eliminate the protest portion of the decisionmaking process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	21	Subpart 4160 - Administrative Remedies	BLM should simplify billing procedures for permittees The BLM should update its billing system for permittees. Billing for permittees with less than 100 AUM's could be changed to billing every 5 or 10 years. This change would decrease the BLM's administrative workload each year. Multiple year billing should also be available for permittees with more AUM's billed if requested.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	34	Subpart 4160 - Administrative Remedies	Bills: Provide the opportunity for permit holders to pay their grazing bills in advance for periods of 2 or more years. Perhaps at a small discount for years 2 or further out as an incentive to usesuch a procedure. It's not much different than a long-term periodical subscription or organizational memberships, and would provide some benefit to both the producer and the BLM.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	38	Subpart 4160 - Administrative Remedies	At 4160.3, Final Decisions: The WSGB comments and request a change in this Section so that a BLM Grazing Decision is stayed during an Appeal by a Section 3 permittee.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	12	Subpart 4160 - Administrative Remedies	43 C.F.R. Part 4160 - Administrative Remedies. PLC and CCA believe that BLM is providing administrative remedies to challenge too many BLM actions. This keeps BLM from achieving its statutory duties under the Taylor Grazing Act, the Public Rangelands Improvement Act, and the Federal Land Policy and Management Act.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Thille	Rod		NM	1394	5	Subpart 4160 - Administrative Remedies	4160.4 "Interested public" be changed to "affected individual or organizations".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miyamoto	Doug	Wyoming Department of Agriculture	WY	910	12	Subpart 4160 - Administrative Remedies	4160.2 - Protests: * Currently, permit renewals require a Proposed DeciSion and a Protest period. We support streamlining the permit and lease renewal process by eliminating the Protest portion (excluding permittees or lessees) of the Proposed Decision process and Issuing a Final Decision. Additionally, WOA would support Mediation being offered to the permittee or lessees to address rangeland health concerns, based on the guidelines offered in BLM's Collaborative Stakeholder Engagement and Appropriate Dispute Resolution document located at: https://www.blm.gov/sites/blm.gov/files/ServicesCADREngagementandADRGuide.pdf flpage=3&zoom=auto.-205.775
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miyamoto	Doug	Wyoming Department of Agriculture	WY	910	11	Subpart 4160 - Administrative Remedies	4160.1- Proposed Decision: -If there Is no Protest period of the Decision Making process then the need for the Proposed Decision Is either eliminated or changed to allow only the permittee or lessees the ability to protest the proposed decision, all others would be notified of the Final Decision and offered the opportunity to file an appeal.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950	18	Subpart 4160 - Administrative Remedies	It is anticipated that the proposed approach would affect a broad range of provisions within the Sub-Chapter D - Range Management, Group 4100, and its subparts contained therein, of the Code ofFederal Regulations. The implementation of a completely new program or administrative process would potentially impact large sections of the regulations and will require the evaluation of each and every subpart of Group 4100 as to effect and applicability towards the same. An example of which follows: Subpart 4160 - Administrative Remedies, would be amended to include an additional section designated §4160.5, State Land Claims Board. The section would have to detail the processes described herein and above in concise language lacking any ambiguity on the provisions detailing a Claimants rights if successful within the said Board. Furthermore, on Subpart 4160, §4160.1 would require the addition of a paragraph section that states, in effect, the following:
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950	19	Subpart 4160 - Administrative Remedies	(d) the provisions of(a), (b) and (c) of §§4160.1 above, do not apply to any certified final decision by a State Land Claims Board, as set forth in §§4160.5 of this Sub-Chapter.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364	92	Subpart 4160 - Administrative Remedies	OLD TEXT NONE NEW TEXT 4160.1-1 Proposed decisions on permits or leases In the absence of a documented agreement between the authorized officer and the permittee(s) or lessee(s), the authorized officer shall serve a proposed decision on any applicant, permittee or lessee, or the agent of record, or both, who is affected by the proposed action on applications for permits (including range improvement permits) or leases by certified mail or personal delivery. The authorized officer shall also send copies to other affected interests. The proposed decision shall state the reasons for the action, including reference to pertinent terms, conditions and/or provisions of these regulations, and shall provide for a period of 15 days after the receipt for the filing of a protest. 4160.1-2 Proposed decisions on alleged violations If the authorized officer determines that a permittee or lessee appears to have violated any provision of this part he/she shall serve a proposed decision on the permittee or lessee, or his agent, or both, by certified mail or personal delivery. The proposed decision shall state the alleged violations and refer to specific terms, conditions, and/or provisions of these regulations alleged to have been violated and the reasons for the proposed decision. As applicable, the proposed decision shall state the amount due under Sec 4170.1. The proposed decision shall provide for a period of 15 days after receipt for the filing of a protes
Subpart 4170 - Penalties								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1274	4	Subpart 4170 - Penalties	Penalties for trespassing must be much more severe.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Guild	Joseph			1208		Subpart 4170 - 3 Penalties	When an allotment, or a portion thereof, is placed into voluntary non-use for a season by the permittee for any number of a variety of reasons such as drought, inadequate forage, lack of water and inability to water haul, recent fire or excessive feral horse numbers impact beyond AML, among others, the BLM should not penalize this wise use resource management decision. Examples of such penalization would be changing the "preference right" number of AUMs to a "permitted use" number that is less than the preference right number, using the term permitted use instead of preference right in a new ten year grazing permit or reducing the season of use or AUMs when the resource can once again support the historic number of AUMs based upon a scientific monitoring analysis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Quammen	Betsy			1358		Subpart 4170 - 3 Penalties	those who are unlawfully exceeding permit levels must have permits revoked--this is not currently happening and some places have become lawless.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spotts	Richard		UT	1235		Subpart 4170 - 13 Penalties	Require effective discipline where any improper nepotism or conflicts of interest occur, and void any related decisions * Require that permittees agree to civil liens and forfeitures to pay for any unpaid or overdue grazing fees, as well as court costs if formal judicial orders are necessary to stop trespass * Require that permittees who fail to obey court orders to remove trespass cattle understand that BLM will request the DOJ to obtain bench warrants for their arrest and incarceration until compliance occurs * Require that BLM managers who fail to stop chronic trespass grazing are subject to an automatic DOI Inspector General's investigation and the potential for disciplinary action up to and including termination. * Require that permittees may be assessed civil damages for any violations of their permit terms and conditions which result in tangible and harmful resource impacts, such as riparian destruction with the funds to be used for remedial plantings and/or exclusionary fencing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Quammen	Betsy			1358		Subpart 4170 - 4 Penalties	data from monitoring must remain public and we must maintain the right to comment and weigh-in on BLM EIS and EA processes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlisle	Celeste	Return to Freedom Wild Horse Conservation	CA	1016		Subpart 4170 - 1 Penalties	The GAO provided reports to the BLM about trespass grazing in 1990 and in 2016. Of the five suggestions that the GAO made, and which BLM agreed were relevant and necessary changes, only one has been addressed. The EA should include onboarding all of the suggestions the GAO reports made including needing to improve tracking and deference effects, and analyze grazing penalties (which are currently too low to be a deterrent).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	34	Subpart 4170 - Penalties	Sec. 4170: In (a), the WSGB comments that the language that says the AO may cancel the grazing preference in whole or in part should be removed from this Section and from any other Section of the BLM Grazing Regulations. The WSGB justification for this comment is found at section 204 of the FLPMA. Section 204 clearly says that the Secretary of Interior, (not an AO), has this authority. The FLPMA says that the Secretary may delegate this withdrawal authority ONLY to individuals in the office of the secretary who have been appointed by the president. The Taylor grazing Act, still in existence and functional, directed that preference AUM's be adjudicated to Section 3 permittees and the WSGB comments that an AO does NOT have the authority to cancel all or part of Section 3 preference AUM's. The Secretary and/or the BLM certainly have the authority to determine the appropriate % of Preference AUM's to be active. The difference between the preference level and active use level of AUM's are held by the BLM in "suspended use".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	67	Subpart 4170 - Penalties	OLD TEXT: § 4170.1-2 Failure to use. If a permittee or lessee has, for 2 consecutive grazing fee years, failed to make substantial use as authorized in the lease or permit, or has failed to maintain or use water base property in the grazing operation, the authorized officer, after consultation, coordination, and cooperation, with the permittee or lessee and any lienholder of record, may cancel whatever amount of permitted use the permittee or lessee has failed to use. NEW TEXT: § 4170.1-2 Failure to use. After consultation, coordination and cooperation with the permittee or lessee and any lienholder of record, the authorized officer may cancel active use to the extent of failure to use when a permittee or lessee has failed to make substantial active use as authorized for 2 consecutive years. (See Sec.4140.1(a)(2). RATIONALE: Comment: Generally water base property is on private land or even if it is on federal land, the water right generally belongs to the permittee or lessee. If a permittee or lessee is not grazing an allotment, they have no need to provide water if they have no livestock on said allotment. They pay to graze livestock, not other animals. BLM should provide watering if they want other animals to have water.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	28	Subpart 4170 - Penalties	There should be a hold harmless clause for participants when they follow the operating or management plan for each treatment. If their performance meets expectations and an unintended outcome occurs, livestock producers need assurance that they will not suffer adverse effects due to the outcome.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	39	Subpart 4170 - Penalties	Sec. 4170: In (a), the WSGB comments that the language that says the AO may cancel the grazing preference in whole or in part should be removed from this Section and from any other Section of the BLM Grazing Regulations.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	84	Subpart 4170 - Penalties	OLD TEXT If a permittee or lessee has, for 2 consecutive grazing fee years, failed to make substantial use as authorized in the lease or permit, or has failed to maintain or use water base property in the grazing operation, the authorized officer, after consultation, coordination, and cooperation with the permittee or lessee and any lienholder of record, may cancel whatever amount of permitted use the permittee or lessee has failed to use. NEW TEXT If a permittee or lessee has, for 2 consecutive grazing fee years, failed to make substantial use as authorized in the lease or permit AND ANNUAL GRAZING AUTHORIZATION. or has failed to maintain or use water base property in the grazing operation, the authorized officer, after consultation, coordination, and cooperation with the permittee or lessee and any lienholder of record, may cancel whatever amount of permitted use the permittee or lessee has failed to use. RATIONALE Comment [AS46]: This amendment is necessary to confirm that cancellation for "Failure to use" arises only when a permittee or lessee failed to substantially use his/her Active use both authorized in the grazing permit/lease itself and the annual grazing authorization. This clarifies BLM cancelling Active Use for any temporary nonuse in a grazing permit or lease.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	82	Subpart 4170 - Penalties	OLD TEXT (a) The authorized officer may withhold issuance of a grazing permit or lease, or suspend the grazing use authorized under a grazing permit or lease, in whole or in part, or cancel a grazing permit or lease and grazing preference, or a free use grazing permit or other grazing authorization, in whole or in part, under subpart 4160 of this title, for violation by a permittee or lessee of any of the provisions of this part. NEW TEXT (a) The authorized officer may withhold issuance of a grazing permit or lease, or suspend the grazing use authorized under a grazing permit or lease, _____, or cancel a grazing permit or lease and grazing preference, or SUSPEND OR CANCEL a free use grazing permit or other grazing authorization, in whole or in part, under subpart 4160 of this title, for violation by a permittee or lessee of any of the provisions of this part. The authorized officer may not withhold issuance any grazing use authorized under a grazing permit or lease absence issue of a decision in accordance subpart 4160 and absence the effectiveness of the decision. RATIONALE Comment [AS44]: This should be removed as redundant (and confusing) considering the words "in whole or in part" are expressed later in such same rule. Comment [AS45]: This amendment is necessary because often times BLM will assess a claim against a permittee or lessee that is contested by the permittee or lessee, but yet BLM refuses (either intentionally or unintentionally) to issue a decision to adjudicate the claim. BLM will then wait to the beginning of the grazing season to leverage the permittee or lessee to pay; forcing the permittee or lessee to pay for a claim that the permittee or lessee contests
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	Peter	Riddle Ranches, Inc.		1211	2	Subpart 4170 - Penalties	Non Willful Trespass should not be a penalty to the permittee. We believe in multiple use but when tourist, hunters, and the general public leave gates open and allow the stock to drift to where they are not supposed to be it cannot be blamed on the permittee.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	18	Subpart 4170 - Penalties	Any new grazing regulations must provide an efficient way for grazing permittees who repeatedly trespass or disregard the terms and conditions of their grazing permit to have that permit terminated. Any "informal" process must preserve the right of the federal government to address noncompliance including through the revocation of grazing privileges.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	19	Subpart 4170 - Penalties	43 CFR § 4170.1-2 refers to "water base property." However, the clause "water base property" is not defined. 43 CFR § 4100.0-5 defines "base property" as follows: Base property means: (1) Land that has the capability to produce crops or forage that can be used to support authorized livestock for a specified period of the year, or (2) water that is suitable for consumption by livestock and is available and accessible, to the authorized livestock when the public lands are used for livestock grazing. As currently written, it is not clear whether, "water base property" refers to the second portion of the above definition. The State suggests that the BLM considers revising the grazing regulations to make the definition of "water base property" clearer.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	61	Subpart 4170 - Penalties	OLD TEXT Subpart 4180-Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration § 4180.1 Fundamentals of rangeland health. The authorized officer shall take appropriate action under subparts 4110, 4120, 4130, and 4160 of this part as soon as practicable but not later than the start of the next grazing year upon determining that existing grazing management needs to be modified to ensure that the following conditions exist. (a) Watersheds are in, or are making significant progress toward, properly functioning physical condition, including their upland, riparian-wetland, and aquatic components; soil and plant conditions support infiltration, soil moisture storage, and the release of water that are in balance with climate and landform and maintain or improve water quality, water quantity, and timing and duration of flow. (b) Ecological processes, including the hydrologic cycle, nutrient cycle, and energy flow, are maintained, or there is significant progress toward their attainment, in order to support healthy biotic populations and communities. NEW TEXT DELTED OLD TEXT. RATIONALE Many of these determinations are based on opinion, possibly by individuals without any expertise in western land environments or technical training or experience. These determinations will not be based on quantitative data. These are totally random and subjective decisions based on meaningless terms that allows the agency to utilize "fluff" words, but not actually improve ecological conditions. Why is grazing the only use that must meet the overall goals for BLM lands?
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	62	Subpart 4170 - Penalties	OLD TEXT (c) Water quality complies with State water quality standards and achieves, or is making significant progress toward achieving, established BLM management objectives such as meeting wildlife needs. (d) Habitats are, or are making significant progress toward being, restored or maintained for Federal threatened and endangered species, Federal Proposed, Category 1 and 2 Federal candidate and other special status species. NEW TEXT DELETED OLD TEXT RATIONALE Habitat for threatened and endangered (T&E) species prioritized even if it causes other species to become threatened or endangered? Habitat for T&E species must be obtained without consideration of the economic investment or damages, multiple-use, or sustained yield?
Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration								

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Quammen	Betsy			1358	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	in order to protect rangeland health, loosening existing regulations (that aren't even necessarily enforced in many places) will cause more damage-by way of invasive weeds, jeopardy to fire-prone areas, and pressure on threatened species and water sources. Currently, evaluation of 150 million acres in 13 Western states shows that 42% fail to meet BLM Standards for Rangeland Health--70% of these failures being due to livestock overgrazing, according to a study by PEER (Public Employees for Environmental Responsibility). Add to this, nearly 59 million acres have never even been evaluated. If this EIS proposes steps towards deregulation, that erosion of protections will further put pressure on already damaged and under-scrutinized public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	20	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM should also be required to issue an Instruction Memo to all Field offices to direct the AO to assess if rangeland management tools other than reductions in active AUM's will accomplish allotment objectives. BLM should be told, ASAP, by this Administration to use "all the tools in the tool box" prior to reductions in active AUM's, and, when possible, apply the management actions to ONLY those portions of the allotment that are not now achieving allotment objectives rather than only halting grazing or reducing grazing use levels. Specifically, BLM is currently interpreting Section 4180.2(c) in a way that gives BLM the discretion to disregard or even prohibit some of the "appropriate action[s]" listed and identified in the regulation to address rangeland health standards and guidelines. (This is one of our justifications for the complete removal of Part 4180 from the BLM Grazing Regulations.)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Simkins	Connie	N-4 State Grazing Board	NV	1410	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The N-4 Board and current science points to the fact that the rangeland health S&Gs in-place today in Nevada, and likely elsewhere, are simply too general to be accurately measured or assessed. For this reason alone, the N-4 would like to see 43 CFR 4180 and the involved rangeland health S&Gs removed in its entirety during this regulatory update. As written and applied today, this regulation serves no useful function or direction, nor does it contribute to efforts to improve natural resources or livestock grazing practices on the public lands. In its place, the N-4 Board urges the BLM to provide guidance for developing allotment-specific resource objectives, that are realistic, measurable and based on-site potentials, while requiring active involvement and concurrence of the affected livestock permittee(s).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Larson	Pat and Larry		OR	1407	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The EA/EIS should provide a level of confidence that BLM will accept to ensure the environment is protected. The EA/EIS should also take a fresh look at the livestock allotment utilization protocol used throughout the agency to assess the amount of forage removed during the grazing periods. Livestock consume forage. The current BLM process does not rely on random sampling and it does not produce a level of accuracy needed for authorized officer decisions. In many places the BLM has not conducted production sampling to obtain an accurate estimate of the amount of vegetation on the pastures. The EA/EIS cannot accurately assess the monitoring data if it was not collected using a random sampling protocol.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Larson	Pat and Larry		OR	1407	9	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The EA/EIS should also take a fresh look at the Multiple Indicator Monitoring (MIM) protocol. Sampling design influences the accuracy and confidence that an investigator can place on the information derived from a data set. MIM observes several different characteristics along a stream greenline at a predetermined site (DMA) where a transect has been located. 80 systematic steps establish the data set. The information becomes a permanent record intended to reflect the impacts of livestock grazing on the streambank. Without a randomized sampling design, the results of the MIM data collections are not accurate (Larson and Larson 2020).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	16	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Subpart 4180-Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration does not comply with that principle. Section 4180 should be eliminated or rewritten to require use of measurable, quantifiable data and consultation, cooperation and coordination with permittees in the decision making process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	20	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM should also be required to issue an Instruction Memo to all Field offices to direct the AO to assess if rangeland management tools other than reductions in active AUM's will accomplish allotment objectives. BLM should be told, ASAP, by this Administration to use "all the tools in the tool box" prior to reductions in active AUM's, and, when possible, apply the management actions to ONLY those portions of the allotment that are not now achieving allotment objectives rather than only halting grazing or reducing grazing use levels. Specifically, BLM is currently interpreting Section 4180.2(c) in a way that gives BLM the discretion to disregard or even prohibit some of the "appropriate action[s]" listed and identified in the regulation to address rangeland health standards and guidelines. (This is one of our justifications for the complete removal of Part 4180 from the BLM Grazing Regulations.)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Simkins	Connie	N-4 State Grazing Board	NV	1410	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The N-4 Board and current science points to the fact that the rangeland health S&Gs in-place today in Nevada, and likely elsewhere, are simply too general to be accurately measured or assessed. For this reason alone, the N-4 would like to see 43 CFR 4180 and the involved rangeland health S&Gs removed in its entirety during this regulatory update. As written and applied today, this regulation serves no useful function or direction, nor does it contribute to efforts to improve natural resources or livestock grazing practices on the public lands. In its place, the N-4 Board urges the BLM to provide guidance for developing allotment-specific resource objectives, that are realistic, measurable and based on-site potentials, while requiring active involvement and concurrence of the affected livestock permittee(s).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Larson	Pat and Larry		OR	1407	7	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Sampling design influences the accuracy and confidence that an investigator can place on the information derived from a data set. Variance estimates, data set range, adequate sample size, and relative variation were greater with a systematic sampling design as used by MIM (Larson and Larson 2020; 2019). Mean estimates were lower when compared with estimates derived from a random sampling design. The BLM may be estimating utilization at a low level when in fact the different sites meet or exceed the local stubble height standards.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Larson	Pat and Larry		OR	1407	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	If random sampling is not incorporated into the SRH assessment the authorized officer will likely make a subjective and inaccurate determination that the site is failing to achieve and conform with the SRH guidelines. Solution * The solution is to rely on monitoring using random sampling protocols to determine measurable environmental impacts in the EA and establish a level of accuracy.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	31	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	"Could the BLM use existing permits to address areas not achieving land health in grazing allotments?"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Katlyn	Nevada State Grazing Board N2	NV	1174	6	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The fundamentals of rangeland health, as defined by 43 CFR 4180, identified a process to develop regional grazing standards and guidelines (S&Gs). This process required the authorized officer to take appropriate action no later than one year when it is determined that existing grazing management needs to be modified to ensure that the S&Gs were being met. However, the current regulation fails to identify or define what specific, quantitative resource information is needed to make an agency determination. Since then, regional grazing standards and guidelines have been adopted in Nevada. However, the guidance in these and most other S&Gs do not accurately describe the objectives that need to be met. Unmeasurable statements that cannot be accurately quantified or assessed at the grazing allotment or permit-level based on scientifically proven methods need to be avoided. Additionally, the BLM released Technical Reference 1734-6, Interpreting Indicators of Rangeland Health. Now in its fourth version (Pellant, et al. 2005), this agency handbook has constantly warned that the qualitative methods included were not to: ? Act as stand-alone methods to make grazing and other management changes; ? Solely identify the cause or causes of resource problems; or, ? Monitor land or determine any trends. Due to the qualitative nature of this approach, the N-2 Board strongly feels that this field assessment method is subjective and contentious for all parties involved. As such, the Board suggests that these methods not be used to guide any potential grazing management changes or evaluate any current practices. Both the current best available science and the Board suggest that the current S&Gs for rangeland health in Nevada are too general to accurately measure or assess the condition of public lands. Through this regulatory update, the Board would support the removal of 43 CFR 4180 and the resulting rangeland health S&Gs in an effort to improve positive, effective management decisions. Currently, the application of this regulation does not improve any grazing practices or natural resource management in general. As a replacement for this regulation and the S&Gs, the Board suggests that the BLM administers guidelines for management on an allotment by allotment basis. Specifically, the Board asks that these suggested guidelines be based on realistic resource objectives, on-site potential, and focus on active collaboration and involvement with the affected permittees. Similar to comments found above, the Board maintains that achieving resource allotment objectives would be more realistic if they are based on cooperative development of AMPs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	33	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	"How can the BLM continue to look to watershed or landscape evaluation of land health to achieve coordinated management across allotment boundaries?"

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	40	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Quantitative Monitoring: Quantitative monitoring efforts should be tailored to address allotment specific objectives that are impacted by grazing activities. As appropriate, such monitoring should be based on current rangeland science that recognizes the value of identifying soil components and using Ecological Site concepts and their associated State and Transition Models and Disturbance Response Groups or broader Great Groups.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gloeckner	Kena			1198	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	We also feel that your current standards and guidelines for rangeland health are not adequate in the sense that they are too susceptible to subjective interpretation. For example, the 17 rangeland health indicators can easily be interpreted in five different ways by five different people collecting the information - in other words, they are not capable of being objectively defined, measured, compared, and then interpreted to make sound decisions. In 2013 we received a draft decision from the BLM that 50% to 100% of our AUMs in sixteen different use areas was to be reduced based on the 17 Rangeland Health Indicators - the document revealed that in each of the 17 areas the standards were "not met" and the causal factor was "livestock." To better understand this decision, we immediately attended a weekend workshop presented by the people who had developed these guidelines and standards. What we discovered was that the originators of these guidelines and standards could not even agree with each other when assessing rangelands in the field! What was even more shocking was that BLM range personnel who received this weekend training were now "adequately trained" to make decisions that could affect our livelihood. We also learned that these 17 Rangeland Health Indicators were never to be used to determine stocking rates, changes in grazing use, or to identify causes of resource problems; yet, your agency had used these guidelines to do exactly that! There is a huge disconnect within your agency. What might sound good to people thousands of miles away in Washington, D.C., might actually be quite the opposite in reality.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carollo	Dominic	Harney County	OR	1045	6	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	“Promoting Land Health” – With respect to BLM’s stated objective of “[c]onsidering where and how the BLM will evaluate the Land Health Fundamentals and Standards,” Harney County supports BLM revisiting the regulatory framework that governs this process, but would urge BLM do so in a way that accommodates permittees’ ability to demonstrate and remain in compliance with realistic and objective standards. Too often, in the past, inconsistent and subjective standards for evaluating rangeland health and permit compliance have been used. While local BLM districts need to have flexibility to use standards that account for local variations and conditions, the standards need to be realistic and objective. Further, BLM should take care to ensure that continued availability of healthy forage as a sustainable resource for the purposes of grazing is one of the strongest metrics of rangeland health. Finally, Harney County strongly supports BLM exploring ways to use livestock grazing to reduce wildfire risk and improve rangeland conditions, and to take steps to codify the availability of grazing as an accepted method for doing so.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	35	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Use of Ecological Site Descriptions (ESD) should not be part of decision making because they are inaccurate and incomplete in development and untested. These ESDs are continually being updated and changed, therefore decisions and management changes should not be based on this incomplete information.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	It is imperative that BLM not confuse outcomes with outputs. BLM must focus on ecologically positive or neutral results-based outcomes and not on rigid outputs such as stubble height, utilization, dates of use, etc. BLM must properly incorporate current rangeland science and studies that have clarified how flexibility in grazing with a focus on outcomes nearly always results in positive or neutral impacts on rangelands. It is crucial for these outcomes to be based on proper management objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	21	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Issue a draft permit for review that reflects the real grazing that will occur and analyze if standards can be met. Grazing permits that have a permitted number higher than the actual grazing that has or will occurred violates the NEPA requirement to describe accurately the decision being make. Grazing permits that analyze the impacts caused by grazing at numbers below the permitted number makes BLM legally vulnerable to a challenge because of the failure to assess the impacts of grazing at the full permitted number.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	22	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	herefore, I require that the EIS include all information and explanation of methods to acquire the information regarding the following: 1. Expediting grazing authorizations as "a tool to reduce wildfire" or to "improve rangeland conditions." 2. Streamlining protests and appeals -This is likely a reference to a desire by the agencies to reduce timelines for public involvement, increase or codify exhaustion requirements, and to further limit opportunities for the public to be informed about and participate in. 3. Removing the requirement to assess Land Health Standards on every allotment -The regulations say that the new regs will consider "where and how the BLM will evaluate the Land Health Fundamentals and Standards." The agency is currently required to complete these as part of the permit renewal process. 4. Expanding the use of categorical exclusions - i.e. completing fewer full and fair environmental analyses - and undermining public participation opportunities in the process. 5. All current and recent (last ten years) and results of land health standards for each and all lands (including all "pastures" of grazing allotments) within the boundary of the EIS proposal and how, if any, changes to the land health standards will be changed and evaluated and/or revised in the future.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hutchinson	Howard	Coalition of Arizona/New Mexico Counties	NM	1109	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Allotment monitoring takes into consideration the multiple uses taking place on those lands so that livestock impacts can be distinguished from other uses
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	It is crucial for the regulations to mandate reliance on current rangeland science - Ecological Site Descriptions (ESD) and their associated State and Transition Models/Disturbance Response Groups to inform objectives and differing levels of grazing allowed. An understanding and description of the ecological shifts or transitions that have occurred due to disturbance, such as wildfire, or legacy management are imperative in order to frame management objectives under any grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dieterich	Michele		MT	650	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Grazing also ruins rangelands this is quite clear when we look at the track record. Most grazing allotments have not met the Land Health Standards established by your organization. The answer is not to reduce the standards or reduce requirements, but to uphold them and permanently revoke and retire grazing allotments that do not meet the standards. Please consider this research as well when considering these changes. https://www.westernwatersheds.org/wp-content/uploads/2019/06/Whats-eating-the-Pando-Clone-opt.pdf
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	DeSoto	Randi	Summit Lake Paiute Tribe	NV	883	12	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Our opposition to removing requirements that mandate the BLM to assess Land Health Standards on each allotment is based on the fact that rangeland management is not a "one size fits all" process. In order to make effective decisions regarding the status, prognosis, and appropriate level of use within and between allotments, it is necessary to analyze each allotment per current regulations. Not only does this methodology produce defensible information, it also provides an equitable level of service that the public and grazing permittees both expect and deserve from our public land management agencies. Once mandated allotment Land Health Standards are completed, it makes sense to subsequently extrapolate these data on a watershed by watershed basis so as to fmiher inform robust decision making and public land administration.
	Back	Gary			1207	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	While streamlining the permit process may provide some relief, the permit process, as discussed in comment number 3 above, needs to be changed and BLM range personnel need to be conducting the type of monitoring and with sufficient frequency to allow determination of achievement of rangeland standards and conformance with guidelines in "real time" and not near or at the end of the permit term.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
	Cahill	Matthew	The Nature Conservancy	OR	1275	12	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	To improve overall range conditions and increase flexibility, the new regulations should encourage permittees to incorporate rest (non-use) and increase incentives for multiple permittees to coordinate grazing and restoration activities to improve degraded rangelands. One way to incentivize additional rest would be to ensure forage made available as a result of temporary nonuse (as in §4130.4) not be made available to other qualified applicants under other provisions (as in §4130.6-2) except in certain circumstances such as use of another qualified operator experiencing temporary non-use on their own permit due to fire or other restoration activities. These provisions should encourage coordination among permittees as much as possible.
	Anon	Anon		NM	1402	28	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The current language provides too many reasons the authorized officer (AO) can use to reduce livestock grazing, including the reference to Part 4180. We also need to go back to the concept that the BLM must use monitoring, over time, to make reductions. At present, BLM at times uses nothing more that seasonal "utilization" to make reductions.
	Howard	Elizabaeth		NM	1079	8	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The current language provides too many reasons the authorized officer (AO) can use to reduce livestock grazing, including the reference to Part 4180. We also need to go back to the concept that the BLM must use monitoring, over time, to make reductions. At present, BLM at times uses nothing more that seasonal “utilization” to make reductions.
	Reutzel	Barry		NE	362	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Rather than continuously graze year after year there should be periodic times of 2-5 years where grazing is prohibited to allow the land to regenerate rather than sparse grasses being shaved to the ground year after year.
	Allison	Christopher			1182	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Our concern is the future continuity of existing rangeland monitoring programs in the BLM districts. These monitoring efforts have been quantitative in nature and protocols were typically developed in consultation with affected interests and state land grant universities. We recommend the BLM continue collecting these data which add to our knowledge base of the local environment and promote reasonable, equitable decision making

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
	Baker	Darlene		WA	554	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Oftentimes, wolves are killed at the rancher's request because he fears they will kill the cattle, but BLM is allowing the cattle to enter the wolf territory. I urge the BLM to ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species.
	DeFord	Jenny	Salmon River Cattlemen's Association Inc.		1306	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Monitoring is an issue we are deeply concerned about. Qualitative assessments, dubious interpretations of quantitative data, and arbitrary decisions to ignore specific quantitative data have all been mechanisms used to impose management decisions upon us that were otherwise unsupported. Quantitative monitoring efforts should be tailored to address allotment specific objectives that are impacted by grazing activities. As appropriate, such monitoring should be based on current rangeland science that recognizes the value of identifying soil components and using Ecological Site concepts and their associated State and Transition Models and Disturbance Response Groups or broader Great Groups. Available quantitative data should not be arbitrarily ignored, and procedures to ensure that such data is properly evaluated and interpreted should be enforced
	Kitson	Jamie		WA	575	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Grazing of livestock must be contained to areas that are not sensitive habitats for endangered or threatened wildlife species.
	Reetz	Pauline	Denver Audubon	CO	779	14	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Ensure that Land Health Standards are evaluated at least once a decade using peer-reviewed scientific and quantifiable methods. Lands in poor condition should have this process done more frequently.
	Carney	Cheryl		TX	179	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Ensure grazing management does not impede grazed lands from serving as habitat for native predators.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
	Jones	Bobby			1197	29	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Current rangeland monitoring is inconsistent and variable in methods and timing (commonly infrequent), which doesn't allow for reliable trend development. Many of the current monitoring methods are based on opinions and treated as science. * BLM personnel are often unfamiliar with my rangelands, ecosystems, and climate and may lack appropriate experience to determine rangeland "health" and the impact of my livestock on the range condition without measuring key rangeland attributes and knowing site specific management. * Grazing allotments are effected by many things and livestock grazing is not the sole influence on rangeland conditions. As a permitted user, my livestock are unfairly held responsible for rangeland conditions when conditions, based on an individual's opinion, don't meet an arbitrarily set standard. * Rangeland health cannot be determined over a short time period as a trend needs to be estimated. A one-time Rangeland Health assessment could be positively/negatively influenced by multiple short-term factors like rainfall, temperature, season or wildlife that would provide a false interpretation of rangeland health". Rangeland Health assessment cannot estimate a trend.
	Chew	Scott H.	Chew Livestock, Inc	UT	1491	6	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM must do or authorize many more range improvements in wild horse areas; Water projects, chaining, reseeding, and fire should all be used. However, Range Improvement Funds as they are part of our grazing fees, should not be used for Wild Horse projects unless it is also of direct benefit to domestic livestock, even then there should be extra funding found for the project as 50% of grazing fees go into the fund and horses contribute nothing to the fund. Congress in most instances should appropriate separate funding for wild horse range improvements as its own line item, or should require wild horse advocacy groups to fund the project. Wild horse only areas such as The Little Bookcliffs must always use another funding source than Range Improvement Funds.
	Jones	Bobby			1197	20	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM AO's make a variety of Decisions in the course of their responsibilities. Some are administrative and have little impact on the recipient. But many grazing decisions have significant economic impact on family ranches and these types of decisions deserve to be made on the basis of science-based monitoring data that will stand the test of scrutiny. We recommend that the BLM develop science-based technical criteria for the quantity and quality of data in monitoring programs used as appropriate for the various types of grazing decisions.
	Gammett	Glenda		OR	1382	7	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	In order to avoid arbitrary decision-making and require decisions to be based on quantitative data, clarifications to the definition of "Monitoring" to use quantitative data. Quantitative data should be used when the authorized officer determines carrying capacity. Therefore the first paragraph discussing mandatory terms and conditions as follows could be changed to include the following language:

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	27	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. * Include water quality monitoring as part of the land health evaluations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Larson	Pat and Larry		OR	1407	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The BLM Standards for Rangeland Health (SRH) should be examined to ensure the accuracy of information compiled in the reports. Currently the assessments are being abused at the individual District levels rendering subjective results that do not reflect the land condtions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eggers	Laura	YOCKIM CAROLLA LLP	OR	1340	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	With respect to BLM's stated objective of "[c]onsidering where and how the BLM will evaluate the Land Health Fundamentals and Standards," Harney County supports BLM revisiting the regulatory framework that governs this process, but would urge BLM do so in a way that accommodates permittees' ability to demonstrate and remain in compliance with realistic and objective standards. Too often, in the past, inconsistent and subjective standards for evaluating rangeland health and permit compliance have been used. While local BLM districts need to have flexibility to use standards that account for local variations and conditions, the standards need to be realistic and objective. Further, BLM should take care to ensure that continued availability of healthy forage as a sustainable resource for the purposes of grazing is one of the strongest metrics of rangeland health
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frank	Bobbie	Wyoming Association of Conservation Districts	WY	1222	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Wildfires in Wyoming threaten vital habitat, especially that of critical and priority wildlife habitat and private property. The limited parameters for grazing management under existing permits continue to heighten the issue. WACD urges BLM to consider the utilization of domestic livestock grazing to reduce fuel loads and the risk of fire. Allowing permittees to access rangelands earlier or later in the year, when cheatgrass can be combatted using livestock grazing, could be useful in managing fuel loads.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lonn	Jeffrey		MT	958	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Why would BLM propose these changes when their own assessment shows that 42% of their own lands fail to meet BLM standards for rangeland health due to overgrazing? And about 40% of federal rangelands have not been assessed, even though the law requires it.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ure	Amy			1352	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	When state wildlife officials propose introducing new species or a reintroduction of species, the use and health of land resources can be affected in ways such as increased foot traffic, increased ATV and other vehicle use, increased utilization of vegetation, and so forth. Each having a potentially negative effect on current and historical uses. Before State agencies are given priority to proceed and pass the BLM and Forest Service, these connected and sometimes segregated actions should be considered through some type of a NEPA document to ensure rangeland health is not overlooked. This may be as simple as a state evaluation provided to the BLM that documents all permittes have been included in discussions related to the introduction, and all potential effects to livestock grazing recognized and mitigated prior to BLM giving concurrence to the proposal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ure	Amy			1352	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	When livestock have been vacated from an allotment by force, regulation, or otherwise, the BLM should be responsible to continue monitoring rangeland health on that allotment. This will help to evaluate the management of federal mangers as well as ensure that actions are taken to improve the allotment for the benefit of other livestock, wildlife, and recreational users. Too often allotments are closed and deteriorate further and faster due to non-use than was observed with excessive use. Eventually becoming a fire hazard, and climax community disaster.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Corn	Bronson	New Mexico Wool Growers, Inc	NM	1369	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	We recommend that the BLM develop science-based technical criteria for the quantity and quality of data in monitoring programs used as appropriate for the various types of grazing decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	15	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	We encourage BLM to increase investment in BLM capacity and to leverage third parties for monitoring expertise so long as there is proper certification and training for those groups.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	21	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	We also recommend that the EIS include a state-by-state table or infographic illustrating annual levels of livestock grazing AUMs from 1994 to present time. We would also encourage BLM to include data on the number of acres burned during the same time period.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kirk	Stephan		ID	694	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Water quality must be taken into account in range health.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	16	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Use of Ecological Site Descriptions (ESD) should not be part of decision making because they are inaccurate and incomplete in development and untested. These ESDs are continually being updated and changed, therefore decisions and management changes should not be based on this incomplete information.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Laurie		NM	1374	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	To complete land health assessments and acquire current stocking levels of livestock utilize aerial imagery and drones
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	16	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	TNC recognizes that certain biotic and abiotic attributes are more important than others to evaluate condition given the capacity and time constraints faced by managers and the limitations of what managers can expect to change with currently available interventions. A more constrained set of abiotic and biotic indicators focused particularly on critical threats to the ecosystem (invasive annuals and encroaching conifers for terrestrial systems, for example) would make monitoring and evaluation both easier and more applicable to management actions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	39	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The unfunded mandate requirements on the BLM at subpart 4180 have contributed to a diminished capacity within the BLM to conduct traditional monitoring, and cooperative monitoring with section 3 permittees that would provide BLM with monitoring data instead of a "qualitative assessment" of the potential impacts of all grazing animals, and other multiple users on BLM lands

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	14	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The term rangeland health cannot be quantified and therefore cannot be measured. Incorporating rangeland health into the Standards and Guidelines makes the process subjective and opinion-based rather than a data-based factual process. In addition, the use of opinion over fact in the process allows the authorized officer to hold the permittee accountable for impacts from other uses or factors outside his control. Such a process leads to unnecessary conflicts with little opportunity for resolution because there is no factual basis to inform the decisions. Again, any stocking rate or other grazing management decisions should be based on data from quantifiable, measurable attributes collected over time.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	47	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The Regulatory authority should also be provided that gives either the State Governor or the respective BLM State director the authority to remove council members who promote political agendas at council meetings. Resource Advisory Council meetings should remain open to the public and the public should be provided an opportunity during and after the meetings to provide comments to the respective Governor's and BLM State Director on agenda items.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schultz	Nancy		UT	1495	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The regulations say that the new regulations will consider "where and how the BLM will evaluate the Land. There are already so many negative impacts from lack of BLM enforcement that without the minimum standards that the BLM already require it will be anything goes on this irreplaceable BLM management property.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ranch	LeValley		CO	1084	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The reference to advisory council should be deleted from these regulations. Significant scientific advancement has occurred in the range profession and that information should be the basis for establishing rangeland health standards. Science clearly shows that an assessment of the health of rangeland should not be limited to an evaluation of any singular, specific use of the land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	29	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The Range Science profession does not support the BLM's program to assess "proper functioning condition" on riparian areas because the BLM - PFC program is a qualitative assessment process that doesn't actually assess the "functioning condition" of anything.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lees	Aubrey		NY	181	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The proposal states that BLM will promote land health by “Considering where and how the BLM will evaluate the Land Health Fundamentals and Standards.” Currently, the BLM is supposed to do this for all grazing allotments – analyze whether and to what extent each allotment is meeting the land health standards. Unfortunately, the agency has been woefully inept at doing so, resulting in degraded fish and wildlife habitat, denuded streams, and the replacement of native plants and grasses with invasive species. Yet, instead of stepping up and complying with the current regulations, BLM proposes to weaken them even further by allowing the agency to choose when and if to evaluate compliance. This will not promote land health.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Zarrello	Dana	The Cloud Foundation		1337	9	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	the method used by the U.S. Bureau of Land Management to assess range conditions is seriously skewed toward minimizing impacts from domestic livestock and magnifying those from wild horses and burros, according to an independent appraisal. (Attachment) The Proposed Grazing Regulation Revision must address the lack of standard scientific criteria for evaluating livestock allocations and utilization.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hagenbarth	Jim		MT	1003	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The health of the range resource not only depends on livestock but also other uses. The fundamentals of rangeland health should be incorporated at the land use planning level. Site specificity of rangeland management needs to occur because all the aspects of a certain rangeland are site specific. One shoe does not fit all. Rangeland determinations under the regs need to look at all aspects of managing livestock than just numbers. Often times resource management using different kinds or classes of livestock can be positive along with vegetative manipulation and water development to change the grazing patterns and psychology of the grazing animal is very prudent management than just cutting numbers. Vegetative changes on a grazing resource often occur over a long period of time. One has to be patient and by expecting a change the next grazing season is not rational or practical.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	37	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The current language provides too many reasons the authorized officer (AO) can use to reduce livestock grazing, including the reference to Part 4180. We also need to go back to the concept that the BLM must use monitoring, over time, to make reductions. At present, BLM at times uses nothing more that seasonal "utilization" to make reductions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	18	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The current BLM Grazing Regulations at Part 4180 direct the BLM to take Administrative action against a livestock permittee if a qualitative assessment, not quantitative data, indicate a BLM concern that a causal factor on the land being grazed by a permittee is not "healthy" due to livestock grazing. CCA and CO PLC support the BLM authority to use quantitative data from a monitoring program to support management actions on BLM lands to accomplish allotment objectives, but it is inappropriate to use an evolving paradigm on rangeland health, which is currently a qualitative assessment, not quantitative data, to apply punitive action against a livestock permittee. We are now recommending that BLM no longer be required by Regulation to conduct a "rangeland health determination" focused on livestock grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rose	Brent	Northwest Utah Grazing Advisory Board	UT	848	12	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The BLM's Rangeland Health evaluations need to be simplified and modernized. The BLM's Rangeland Health evaluations take too long and use up too much range staff time. The BLM needs to look at simplifying and modernizing these evaluations through using remote sensing where appropriate.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ingram	Jackie			1189	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The BLM should prepare draft rangeland health determinations and draft allotments assessments without a pre-determined assumption that the causal factors relate to livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rose	Brent	Northwest Utah Grazing Advisory Board	UT	848	6	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The BLM should look at working with the NRCS to use the Rangeland Analysis Platform (https://rangelands.app/) to monitor rangeland health indicators. New and fewer indicators should be used, such as bare ground cover, perennial grass cover, shrub cover, annual grass cover, and tree cover. With the tools that are available, much of this can be monitored in almost real time and better decisions could be made using this kind of data.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ingram	Jackie			1189	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The BLM should collect applicable monitoring data to assess applicable rangeland health standards and land use plan objectives, in coordination with permittee(s) and public. Such applicable monitoring data must be collected with careful application of method protocols.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schultz	Brad		NV	1327	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The BLM needs to update the current standards to better reflect the role of ecological processes and mechanisms across all successional phases (stages) of desired (as well as undesired) states so that the concepts of a "healthy landscape" are accurately applied. Early- and mid-successional landscapes (phases) need to be recognized as acceptable and appropriate outcomes of disturbance when they have the desired successional species and the ecological processes needed to progress to desired mid and late successional landscapes are in place. The size of the disturbance may be undesired, but is a separate issue.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Naples	Jean		NY	386	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The BLM must evaluate Land Health Standards at least once a decade using peer-review scientific and quantifiable methods. This includes water quality monitoring as part of land health evaluations and an accurate and site specific economic analysis of grazing with every permit renewal which reveals the money obtained from grazing fees as opposed to the cost of permit administration.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Back	Gary			1207	6	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The 43 CFR Subpart 4100 §4180.2 (e) (11) should be modified to allow for use on non-native species where the likelihood is high for conversion to annual rangelands following wildfire or other catastrophic event, and that this be qualified to include facilitated succession or other terminology that includes reestablishment of native species in the long-term. There are also instances where due to the elevation of allotments, the native grasses are often not "range ready" at the turn on date of early season pastures. Having some pasture land in crested wheatgrass would allow turn on at the scheduled date.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jaca	Elias, Inex, Martin	Jaca Land and Livestock Co.	ID	1431	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Sub part 4180 Rangeland Health Standards: This has been an impediment to appropriate permit renewal and grazing decisions in Idaho. This has led to political bias allowing decisions to be made at the Field Office level without standardized application, without direct measures or defined thresholds. These political decisions are outdated, inappropriate and undocumented and at the same time ignoring all range improvements that have been created. Being a permittee in the Owyhee 68 renewal effort demonstrates to us these terrible fiaws. With regards to Rangeland Health Standards (RHS), why are there different RHS in every state or region? Why do some states have 2, 3 or 5 (RHS) and Idaho has 8 (RHS)? Each state should be the same, simply follow TGA, FLPMA and PRIA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barta	Stacey		MT	1220	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Standards should be fair and consistent based on the ecology and soils of the area, regardless of where the land health standards appear in the regulations. AUM's need to be equal and consistent, not arbitrary.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barta	Stacey		MT	1220	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Standards should be fair and consistent based on the ecology and soils of the area, regardless of where the land health standards appear in the regulations. AUM's need to be equal and consistent, not arbitrary.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Ben		AZ	1481	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Standards of guidelines should be removed and replace with monitoring that is based on science
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff		AZ	1458	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Standards & Guidelines should be removed and replaced with science-based monitoring
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hart	Charles	Society for Range Management	CO	1076	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Section 4180: Do not use the term "standard" when referring to rangeland health. Use a term like "guideline" or "desired condition" or something similar instead. Rangeland health determinations are qualitative assessments, not quantitative measures relative to a defined standard. Rangeland health is a conceptual framework, not a physical characteristic of rangelands that can be measured.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	28	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Section 4180- Section 4180 should be eliminated or completely rewritten. The term rangeland health cannot be quantified and therefore cannot be measured. Incorporating rangeland health into the Standards and Guidelines makes the process subjective and opinion-based rather than a data-based factual process. In addition, the use of opinion over fact in the process allows the authorized officer to hold the permittee accountable for impacts from other uses or factors outside his control. Such a process leads to unnecessary conflicts with little opportunity for resolution because there is no factual basis to inform the decisions. Again, any stocking rate or other grazing management decisions should be based on data from quantifiable, measurable attributes collected over time.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spotts	Richard		UT	1235	11	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Require use of the best available science in livestock grazing decisions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Findling	Karl		OR	1135	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Removing the requirement to assess Land Health Standards on every allotment - The regulations say that the new regs will consider "where and how the BLM will evaluate the Land Health Fundamentals and Standards." The agency is currently required to complete these as part of the permit renewal process. BLM needs to implement allotment monitoring in an effort to reach the three "Rangeland Vegetation" objectives outlined in the current BLM manual, sooner, rather than later. Empirical, science-based Best Management Practices (BMPs), need to guide future grazing on public lands. The agency has also been failing to meet Land Health Standards on many, public land grazing-allotments throughout the west. Instead of meeting the standards, it appears BLM plans to lower the bar of having to meet them. As an example, Oregon's, Vale District, BLM, has a very poor record of monitoring, The Vale District has shown decades of inability to manage most all allotments for grazing. Since implementation of the 1995 grazing regulations, 78 of the 198 allotments within the planning area have had a rangeland health evaluation completed, of which 61 were not meeting Standards. 94% of the 78 allotments surveyed, have failed rangeland health standards. It can only be concluded that the remaining 120+/- allotments will fail as well, IF they are ever surveyed. Of the 61 not meeting Standards, 59 were found to not be meeting due to existing livestock grazing management. The BLM should consider: 1. Sage grouse are imperiled, primarily due to annual grass invasions and Juniper invasion, due in part to livestock grazing, and lack of sufficient monitoring to comply with Standards. 2. In order to avoid ESA listing, grazing will have to be reduced on a landscape scale, as a number of western states have shown a third-year decline in sage grouse numbers, since the 2015 sage grouse plan was approved. 3. Analyze and adopt reasonable alternatives emphasizing efficiency, public accountability, science, and native species on BLM lands. 4. Flexible grazing schedules should be evaluated and elimination of "fixed" season grazing considered.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wuerthner	George		OR	830	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	removing the requirement to assess Land Health Standards on every allotment - The regulations say that the new regs will consider "where and how the BLM will evaluate the Land Health Fundamentals and Standards." The agency is currently required to complete these as part of the permit renewal process. The agency has also been failing to meet Land Health Standards on many, many public lands allotments throughout the west. Instead of meeting the standards, it appears BLM plans to lower the bar of having to meet them. This is unacceptable. There is no reason to rush evaluations to promote private profit use of our public lands. A thorough examination of the impacts of grazing should be the priority not working to get cows or sheep on our property.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ruyle	George	University of Arizona	AZ	913	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Remove section 4180 from grazing regs and put it in regs or other policy that relates to all land uses and land types. In the grazing regulations reference the section on rangeland health where appropriate. The Fundamentals of Rangeland Health are not scientifically supported and there is no indication of their source or any known scientific consensus. Modify the “fundamentals of rangeland health” to eliminate those that relate to water quality and endangered species. Those are not attributes of rangeland health, they are legal requirements. Drop the term “standard” when referring to rangeland health and substitute guideline or desired condition or similar term. Assessment of rangeland health is not a quantitative measure relative to a defined standard. It is a qualitative judgement based on multiples qualitative indicators. “It is also clear that the evaluation of rangeland health is a judgment, not a measurement. Rangeland health, like range condition or ecological status, is not a physical characteristic of rangelands that can be measured. The evaluation of rangeland health will require judgments on the significance and meaning of the indicators that are measured.”p.97 (Quotes from the Committee on Rangeland Classification. 1994. Rangeland Health: New Methods to Classify, Inventory and Monitor Rangelands. National Research Council. National Academy Press., Washington. 180 pages.)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Lamar		TX	740	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Remove section 4180 from grazing regs and put it in regs or other policy that relates to all land uses and land types. In the grazing regulations reference the section on rangeland health where appropriate. The Fundamentals of Rangeland Health are not scientifically supported and there is no indication of their source or any known scientific consensus. Modify the “fundamentals of rangeland health” to eliminate those that relate to water quality and endangered species. Those are not attributes of rangeland health, they are legal requirements. Drop the term “standard” when referring to rangeland health and substitute guideline or desired condition or similar term. Assessment of rangeland health is not a quantitative measure relative to a defined standard. It is a qualitative judgement based on multiples qualitative indicators. “It is also clear that the evaluation of rangeland health is a judgment, not a measurement. Rangeland health, like range condition or ecological status, is not a physical characteristic of rangelands that can be measured. The evaluation of rangeland health will require judgments on the significance and meaning of the indicators that are measured.”p.97 (Quotes from the Committee on Rangeland Classification. 1994. Rangeland Health: New Methods to Classify, Inventory and Monitor Rangelands. National Research Council. National Academy Press., Washington. 180 pages.)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Swasey	Amber	Mesa County	CO	822	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Rangeland health is largely considered an evolving paradigm among range professionals and science-based published literature. Mesa County supports the BLM's authority to use quantitative data from a monitoring program to support management actions on BLM lands to accomplish allotment objectives, but it is inappropriate to use an evolving paradigm on rangeland health, which is currently a qualitative assessment, not quantitative data, to apply punitive action against a livestock permittee.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spratling	Craig	N-1 Grazing Board Nevada	NV	865	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Rangeland health is influenced by other activities not just grazing, therefore these standards and guidlines need to be addressed somewhere where these other activities can be given attention also. Maybe where overall planning is addressed would be the appropriate place.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rose	Brent	Northwest Utah Grazing Advisory Board	UT	848	13	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Rangeland Health Evaluations should not just affect grazing permits and allotment management plans as they currently do when grazing is identified as part of the cause for not meeting the standards. If recreation, wild horses, wildlife, oil and gas, minerals, or any of the other multiple uses on BLM lands are contributing to the Rangeland Health Standards not being met, the BLM should also be tasked with making the necessary adjustments in those uses to address Rangeland health concerns. Livestock grazing should not be the only use that is required to make adjustments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dowell	Samuel		OR	750	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Rangeland health determinations -Blm is using 4180 to dictate solutions for range plane health determinations without casual connection. The solution seems to always be cut AUMs when tha actual solution may not be related to carrying capacity, but rather season of use or the need for range improvements.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren			1368	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Rangeland Health concept should not be in regulation or as a standard or guideline associated with grazing management as methods do not exist that allow for defensible assessments. It is not possible to determine that grazing alone is causing observed outcomes unless an appropriate experimental design exists that allows for such a determination.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	19	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Rangeland health cannot be determined over a short time period as a trend needs to be estimated. A one-time Rangeland Health assessment could be positively/negatively influenced by multiple short-term factors like rainfall, temperature, season or wildlife that would provide a false interpretation of "rangeland health". Rangeland Health assessment cannot estimate a trend.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	12	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Rangeland health cannot be determined over a short time period as a trend needs to be estimated. A one-time Rangeland Health assessment could be positively/negatively influenced by multiple short-term factors like rainfall, temperature, season or wildlife that would provide a false interpretation of "rangeland health". Rangeland Health assessment cannot estimate a trend.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Clopton	Zay and Nancy		NM	835	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Range health cannot be determined when assessed on inconsistent and with short term methods as the short term assessment is too likely to be impacted by temporary factors like rainfall, season, temperature or wildlife that do not give a true picture of overall range health
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	Wilson Ranch, Inc	NV	1288	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Quantitative Monitoring: Quantitative monitoring efforts should be tailored to address allotment specific objectives that are impacted by grazing activities. As appropriate, such monitoring should be based on current rangeland science that recognizes the value of identifying soil components and using Ecological Site concepts and their associated State and Transition Models and Disturbance Response Groups or broader Great Groups.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Prior to RR 94 revisions a number of things were occurring that I feel we need to get back to: a. Science based monitoring was taking place on a regular basis. It isn't now. Most of the monitoring that occurs is done in a short period of time prior to our 10-year permit renewals. If we get back to scientific monitoring on a regular basis it will eliminate the need for Rangeland Standards and Guidelines (Sec.4180)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	15	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Poorly developed and indefensible data on rangeland conditions (rangeland health) creates a negative perception of livestock use on federal lands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Small	Sue		NM	995	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	no seeding of non native plant species should be allowed. Native plant species are already threatened by climate variability, precipitation decreases, temperature increases, and herbivore overuse; adding non native plant species competition is unreasonable.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harris	Donna		OR	701	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Monitor water quality
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	20	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Livestock grazing management is prescribed at the grazing permit, allotment, and pasture level. Stocking rates and densities, grazing seasons, and rotations are all prescribed at these more localized scales, not at watershed or landscape scales. o The intensity and skill in managing livestock movements varies depending on the manager in control. In turn, the spatial and temporal patterns of livestock distribution across an allotment or pasture varies depending on the manager in control. Livestock distribution across space and time plays a pivotal role in the ecological impacts that result from the grazing activity. Thus, a manager's skill and style are important factors in determining the effects that will result from the grazing he/she oversees. o For these reasons, watershed and landscape level evaluations should not be used to determine if allotment and pasture level management practices should be continued or modified. To do so puts good grazing managers at risk of being forced to change their management practices as a result of their neighbors less successful practices. Conversely, it could allow poor grazing managers to continue their subpar practices if they have enough neighbors implementing more successful practices. o The question posed here stems from a basic problem that has always plagued natural resource management. How does one monitor and make decisions at a local scale and simultaneously evaluate what is happening at larger scales? One approach has been to use local scale monitoring than can be amalgamated to larger scales. The challenge then becomes how to keep the local scale monitoring feasible and affordable. BLM already has manualized stratification procedures to address this challenge. Monitoring sites (Key Management Areas) are selectively located and stratified so the data collected at each monitoring location is used to represent the larger strata it falls within. o In practice, the manualized stratification process for BLM Key Management Areas, Critical Areas, and other monitoring sites has seldom been completed. Thus, the representative area to which data collected from these sites is applicable remains undefined and the data must instead be treated as point data that cannot be amalgamated to larger scales. o The grazing regulation revisions should require that an appropriate stratification process be completed for all BLM Key Management Areas, Critical Areas, and other monitoring sites that will continue to be relied upon to provide data for decision making processes. Stratification will allow data from these monitoring sites to be assigned an area to which it is considered representative. The acreage values associated with these monitoring sites can then be amalgamated to whatever scale is of interest.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cram	Jennifer		CO	793	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Land Health Standards should continue to be assessed for every allotment, and the BLM should have to meet them (station 4)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bibb	Martha		ID	886	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Land health standards on grazing allotments are currently not adequately evaluated. Reduce the number of allotments to correspond to the current number of range managers. I have personally walked grazing allotments adjacent to non-grazed lands and have seen with my own eyes the devastation to grazed lands. Sage height is drastically reduced. Native grasses are eaten almost entirely off and do not have adequate time to replensh due to grazing. Cheat grass dominates. The cryptosporidium holding down the soil is descimated and big clouds of dust follow cattle as the move through the land. This pollutes the air as well as destroys the soil. There are simply not enough range managers to do the correct evaluation of environmental health. A solution would be to reduce the allotments to a size and number that corresponds to the actual number of agents who could then do a proper job of evaluation. Currently there are not enough managers to do more than a very poor job. We need to do more, employ more and employ better educated managers who will actually protect our public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lonn	Jeff		MT	642	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Land Health Standards assessment should continue to be required for permit renewal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mackaben	Ronny		MT	758	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	land health should include: Targets grazing Controlled burns Riparian repair Rotational grazing Possibly setting aside wildlife habitat

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tague	Joe		MD	795	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Land Health Assessments and Evaluations need to be conducted at the appropriate scale. The scale has to be at an ecological meaningful scale such as watershed or other meaning full geographic level such as a basin and range in the Great Basin or on a specific wildlife population unit. a. To piece meal the assessments and evaluations based on allotments or project areas is at too fine a scale to provide for the variation of the physical and vegetative characteristics across the broader area. Also doing these assessments and evaluations at the allotment and project level does not provide the context of the what is going on across the landscape and address what the activity or authorization needs to specifically address if anything. For example, if an allotment of project area does not meet a Standard because of dominance of cheatgrass but is an area of repeated large fires that perpetuate the dominance of the cheatgrass, then the permittee/operator should not be required to invest in trying to establish native vegetation over the short term with out a strategy for moving the entire area towards meeting land health. b. Doing the assessment and evaluations at a broader scale would allow a planned schedule and prioritization of areas to collect and analyze the data with fewer data points using the AIM Strategy. This would be more efficient and effective in addressing land health over the longer term. This data is also used by other scientist and provides a constant protocol and methodology for collecting this data that could be used in numerous ways and compared readily across areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tague	Joe		MD	795	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Keep the Guidelines for meeting Land Health for grazing in subpart 4180. These guidelines are specific to grazing and need to remain in place.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	20	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	It is crucial for the regulations to mandate reliance on current rangeland science and the scientific recognition that many ecological sites have an ecological potential that is no longer able to meet pre-settlement "reference state." An understanding and description of the ecological shifts or transitions that have occurred due to disturbance, such as wildfire, or legacy management are imperative in order to frame management objectives under any grazing permit. Ecological Site Descriptions (ESD) and their associated State and Transition Models/Disturbance Response Groups should be relied on, when they are available, to inform objectives and differing levels of grazing allowed. Depending on the given state of any ecological state, grazing influences the site dynamics in different ways. Any given ecological site has a range of "potential" states (i.e., vegetation characteristics) based on climatic conditions, past and present disturbance, and other field conditions. Each ecological site has multiple states it can exhibit. An understanding and description of the ecological shifts or transitions that have occurred due to legacy management are imperative in order to frame management objectives under a grazing permit renewal or any other grazing decision.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cooke	Daniel		OR	1209	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Include water quality monitoring as part of the land health evaluations. Not having this information hurts every stakeholder
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cascade	Robyn	Great Old Broads for Wilderness; Northern San Juan chapter	CO	1102	9	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Include water quality monitoring as part of the land health evaluations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	11	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Include water quality monitoring as part of the land health evaluations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moss	Paul		MN	856	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Include water quality monitoring as part of the land health evaluations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fahlgren	John	Valley County Commissioners	MT	1143	6	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	In our part of Montana, the Standards and Guidelines have been a very effective tool for BLM to improve the condition of the rangeland and to communicate the results with the public. The standards are now well understood by the ranchers. The local BLM office issues watershed level reports prior to renewal of ten-year permits. These reports provide solid evidence of sound management of grazing by BLM and the ranchers; and are an effective resource to counter environmental groups claims of mismanagement. We understand there are concerns with the standards; but wish to state our support for at least the option to continue what is working.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ball	Robert		CO	1083	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	In order to effect positive changes in resource conditions, like managing cheatgrass, increased emphasis should be given to monitoring and improving rangeland health as directed in subpart 4180. The basic regulatory format to implement improvements in the vigor and density of perennial native rangeland plants already exists, but is not being used enough, because the needed changes require sacrifices from grazing permittees. Giving increased “flexibility” to grazing permittees, whose past grazing practices, in many cases, created the problems (cheatgrass, invasive weeds, poisonous plants, accelerated erosion, dominance by non palatable native plants) is not a solution. Increase grazing deferment and even rest to favor the health of native perennial plants are needed. No matter how closely cheatgrass is grazed it will produce a seed crop, though desirable perennial plant species will often be grazed out of the plant community.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gaines Quammen	Betsy			1333	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	I want to first point out that in order to protect rangeland health, loosening existing regulations (that aren't even necessarily enforced in many places) will cause more damage-by way of invasive weeds, jeopardy to fire-prone areas, and pressure on threatened species and water sources. Currently, evaluation of 150 million acres in 13 Western states shows that 42% fail to meet BLM Standards for Rangeland Health--70% of these failures being due to livestock overgrazing, according to a study by PEER (Public Employees for Environmental Responsibility). Add to this, nearly 59 million acres have never even been evaluated. If this EIS proposes steps towards deregulation, that erosion of protections will further put pressure on already damaged and under-scrutinized public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	20	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	How can the BLM continue to look to watershed or landscape evaluation of land health to achieve coordinated management across allotment boundaries?
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schultz	Nancy		UT	1495	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Health Fundamentals and Standards." The agency is currently required to complete these as part of the permit renewal process. The agency has also been failing to meet Land Health Standards on many public land allotments throughout the west. Instead of meeting the standards, it appears BLM plans to lower the bar of having to meet them.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	11	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Grazing allotments are effected by many things and livestock grazing is not the sole influence on rangeland conditions. As a permitted user, my livestock are unfairly held responsible for rangeland conditions when conditions, based on an individual's opinion, don't meet an arbitrarily set standard.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren			1368	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Fundamentals of Rangeland Health is a valuable concept for research to develop analyses capable of quantifying attributes of ecosystem functions. It should not be in regulations, as the concept fails to adequately inform decision-makers about extant rangeland attributes, planned management and expected outcomes
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Correll	Leanne	SER Conservation District	WY	1066	14	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Fundamentals of Rangeland Health and Standards and guidelines for Grazing Administration. These are not scientifically supported and there is no indication of their source or any know scientific consensus. We urge you to modify them wherever they are placed in the CFR. Modify them to eliminate those that relate to water quality and endangered species. Those are not attributes of rangeland health, they are legal requirements.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	13	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Fundamentals of Rangeland Health TNC supports application of the Fundamentals of Rangeland Health (Fundamentals) to all uses of public lands from recreation to extractive industry, to best conserve and restore resources. TNC understands that many livestock producers are frustrated that the Fundamentals appear to apply only to their operations and not to other beneficiaries of BLM's multiple use mandate, despite being foundational to resource health writ large.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	17	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	For the last three years for which the Bureau published Rangeland Inventory, Monitoring, and Evaluation reports (2012-2015), the BLM inventoried an average of 0.7% of its rangelands, and evaluated an average of 2% of grazing allotments for rangeland health standards.[7: See Rangeland Inventory, Monitoring, and Evaluation Reports for years 2013, 2014, and 2015 available at https://www.blm.gov/site-page/rangeland-inventory-monitoring-evaluation-rime-data .] This seems highly insufficient as a basis either for a programmatic evaluation or evaluation of specific allotments, and certainly cannot provide the basis for timely corrective action. The BLM must address its incapacity to effectively evaluate the rangelands within grazing allotments for compliance with the rangeland health standards and guidelines. Consistent with 43 USC §1711, §1752 (d) and (e), and 43 USC §§1901(b) and 1903(a), the regulations should require that a scientifically defensible rangeland health evaluation occur at least every ten years for every allotment and that grazing authorizations cannot be made if this burden is not met. The evaluation should cover enough of the allotment to be meaningful.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren			1368	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Federal land management agencies should be held to a higher standard of professional integrity than that afforded through reliance on an unquantifiable concept such as rangeland health.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	21	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Extending the timeline for appropriate action implementation The requirement for BLM to "take appropriate action as soon as practicable but not later than the start of the next grazing year" is unrealistic and overly aggressive. Both the BLM and the permittee need a more sufficient amount of time to implement management changes to the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cascade	Robyn	Great Old Broads for Wilderness; Northern San Juan chapter	CO	1102	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Expanding exclusions for land health assessments and environmental analyses. The BLM is required to complete analysis of Land Health Fundamentals and Standards as part of the annual permit renewal process. We are aware that currently many allotments do not meet the standards and the proposed revised regulations appear to weaken a prescription that is already not protecting our public lands from degradation due to grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carney	Cheryl		TX	179	8	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frank	Bobbie	Wyoming Association of Conservation Districts	WY	1222	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Currently, Rangeland Health Standards are applicable to all permitted activities on BLM lands; however, the regulations are only cited under the livestock grazing section. BLM should consider moving 43 CFR 4180 regulations to the planning regulations section to address all permitted activities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barta	Stacey		MT	1220	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Cooperative Monitoring & Adaptive Management- Permittees should perform annual monitoring, BLM to do landscape scale monitoring every 5 years. Annual operating meetings with all parties to review results of implementation of short/long effectiveness monitoring and adjust management as needed.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	40	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Contrary to the science on this subject, Subpart 4180 also puts an inappropriate focus on livestock management. The livestock industry permittees who are dependent of economic access to BLM grazing lands, and the BLM itself, have received a black eye, neither of them deserved, as a result of BLM's application of the direction in subpart 4180.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ghormley	Randy			1356	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Comments Associated with the Documents in Station 1 - Promoting Land Health The BLM should clearly demonstrate how the proposed grazing regulations may influence land health, where applicable. For example, saving time and funding through streamlining will be of little value if the current trend of reduced budgets and personnel continue. The BLM should clearly articulate assumptions for improved land health as associated with the proposal. * Most current Land Health indicators are useful, but they are quite subjective. The proposed grazing regulation changes offer an opportunity to improve the indicators and processes associated with land health assessments by modernizing (i.e. updating) the science associated with the values being assessed. These include soils, watershed and riparian systems, wildlife and TES resources, and others. * Reducing public involvement opportunities for CE categories under permit and lease renewals and transfers might result in a cause and effect relationship to the BLMs ability to meet Land Heath Standards. Rather, look for other opportunities to streamline processes if that truly is a need. * Like the targeted fuel reduction proposal, the BLM should improve land health evaluation categories by including a target achievement date for progress in meeting the standards. For example, current categories include wording that states "making significant progress towards" or "not making significant progress towards" meeting a certain standard. This is not very useful for the BLM's stated objective of promoting public lands conservation, particularly for resources at risk. Rather, the categories should include a timeframe for achieving or meeting the standard. For example, "appropriate action has been taken to meet the standard in a five-year time period" or whatever is deemed appropriate and reasonable to the ID Team and Decision Maker. Otherwise, in some cases some areas are constantly "trending towards" the indicators without ever getting there. I encourage the BLM to modernize the Land Health Standard portion of the proposed grazing regulation update by adding timeframes for which land health standards can be achieved. This will greatly improve the land health evaluation process and improve the public's confidence in the process. * There is an opportunity to improve the wildlife aspect of state land health standards by including a specific evaluation criteria associated with wildlife movement corridors. In my experience, these are often overlooked in the evaluation process. As stated previously, this is another example of vastly improved science-based understanding that strengthens the modernization process of the proposed regulation update. * There is an opportunity to improve the wildlife and TES aspect of state land health standards by including a specific evaluation criteria associated with proving effective separation between bighorn sheep and domestic sheep, where
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Lamar		TX	814	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM's use of the word "Standard" referring to an assessment of rangeland health is misleading and inappropriate. Evaluation of rangeland health is a subjective and qualitative process relying on professional judgment, not a quantifiable objective measure. "Standard" should be replaced in BLM's grazing regulations and instructions with terminology that more accurately describes the process and its interpretation.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frank	Bobbie	Wyoming Association of Conservation Districts	WY	1222	6	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM should consider revising these regulations to permit the use of grazing to address invasive plants. Livestock grazing on public lands can be utilized to reduce invasive and noxious plants, such as cheatgrass. BLM grazing regulations should allow flexibility to use grazing as a tool to reduce noxious and invasive plants on public lands. BLM should also consider under what circumstances herbicides may be used on public lands to manage invasive and noxious plants.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	25	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM should be obligated to make any adverse determinations specific to grazing "practices" or to grazing use "levels" instead of assuming the determination applies to both. Section 4180.2(c) explicitly directs the BLM to make its rangeland heath determination specific to "existing grazing management practices" or "existing ... levels of grazing use." However, when BLM decides to make an adverse determination as to "existing grazing management practices," as opposed to grazing use "levels," BLM is still relying upon the first condition in Section 4110.3-2(b) (aka "not consistent with the provisions of subpart 4180") to reduce the level of grazing use, i.e. decrease the permitted use AUMs. (Again, part of our justification for complete removal.)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	10	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM personnel are often unfamiliar with my rangelands, ecosystems, and climate and may lack appropriate experience to determine rangeland "health" and the impact of my livestock on the range condition without measuring key rangeland attributes and knowing site specific management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	19	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM needs to use consistent methods that remove personal opinion and bias, actually measure something and can be used across the majority of BLM allotments and provides understandable information that can be defended.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	21	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM needs to commit to collecting data in a timeframe that allows for developing meaningful trends.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	20	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM needs to commit to collecting data in a timeframe that allows for developing meaningful trends.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM must determine for each grazing allotment if there has been an impairment of the quality of the environment using the standards for rangeland health.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	23	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM currently interprets Section 4180.2(c) as allowing the BLM to apply any adverse rangeland health determination in a pasture (or discrete confined area enclosed by fence and/or natural topography) to another pasture(s) resulting in an adverse determination for such other pasture(s). This occurs even though BLM's own monitoring data for the adverse determination is specific to a pasture and not to any other pasture(s). (This statement is part of our justification to remove all of Part 4180 from the Grazing Regulations.)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	27	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM AO's make a variety of Decisions in the course of their responsibilities. Some are administrative and have little impact on the recipient. But many grazing decisions have significant economic impact on family ranches and these types of decisions deserve to be made on the basis of science-based monitoring data that will stand the test of scrutiny. We recommend that the BLM develop science-based technical criteria for the quantity and quality of data in monitoring programs used as appropriate for the various types of grazing decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mackaben	Ronny		MT	758	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	as to should BLM update standards for land health? Yes, if the permittee/allotment holder is allowed ample time (2 weeks to 1 month) to create both short-term and long-term goals that meet these land health standards. Wildlife and livestock will stay on a riparian area unless they are provided water away from the riparian area.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	20	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Applying the proper solution BLM is relying on 4180 to dictate their solutions to rangeland health determinations without a causal connection. The immediate solution seems to be to cut numbers when the solution might not be related to carrying capacity but rather to season of use of lack of range improvements, etc. Section 4180.2(c) explicitly directs the BLM to make its rangeland heath determination specific to "existing grazing management practices" or "existing ... levels of grazing use". However, when BLM decides to make an adverse determination as to "existing grazing management practices", as opposed to "levels", BLM is still relying upon the first condition in Section 4110.3-2(b) (aka "not consistent with the provisions of subpart 4180") to reduce the level of grazing use, i.e. decrease the Permitted Use AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hellyer	Jim		WY	709	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	another suggestion that would benefit the range is to make range health standards apply to all animals that graze. For example, we have had the call from a biologist, not the range specialist, that the cows should be moved because of riparian concerns. In our case this a futile act because simply removing the cows only means that cows don't affect the ripaian areas after a certain date....but the feral horses stand eat the riparian as do the elk...consequently there is no purpose of practical implementation of range health standards onto allotments or ranges that have multiple species present. The solution is to either get rid of range health standards altogether, since in our case they are completely arbitrary due to the presence of horses and elk, or apply the standards to all. The in-between application of range health standards is really unfair and penalizes ranches for situations not our making. Other matters such as Outcome based grazing and targeted grazing to reduce fuels are good starts. They need to be authorized further with more flexibility and the outcomes will be better and catastophic fires can be reduced.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tague	Joe		MD	795	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Addressing to what extend and when meeting Fundamentals for Land Health apply needs to be incorporated into the Resource Management Planning process and added to an appropriate location in Subpart 1600. In this way, am BLM management activities and authorizations would address how they would either be required to meet, exempt from meeting, or what Fundaments or Standards would not be met for a period of time during the planning process. Most authorizations already have best management practices or design features that should address the Fundamentals and Standards. Therefore, this should now in any way increase the requirements for management activities or authorizations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Whyde	Don		WY	871	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	A permit should identify where, when and how many livestock can graze an allotment all guided by the health standards. There has to be compliance by the Operator and enforcement by the BLM or the rules mean nothing. Establishing rangeland standards and conditioning a permit to work toward meeting those standards is the only way to ensure that the public lands are healthy and productive into the future.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	A final critical issue is part 4180 of the current grazing regs. 4180 should be completely removed as it is totally a qualitative and subjective use of a grazing process and not a peer-reviewed, scientific and quantitative management process. The federal lands livestock industry has some suggestions on replacement regs for 4180. Attached to this letter are other pertinent proposals and reasons that should be considered as the draft EIS is constructed. This letter also signifies that I wish to be a part of the process, where NEPA allows, as it proceeds forward. I support the language of the attachments because industry developed them over a period of years with much consultation with range management professionals.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Correll	Leanne	SER Conservation District	WY	1066	13	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	4180 - Fundamentals of Rangeland Health and Standards and guidelines for Grazing Administration. The SER CD supports the removal of this section from the grazing regulations and placing it other regulation that relates to all land uses and land types. The new placement of this information should be referenced in 43 CFR 4100. So, the resulting concept is rangeland health standards should not only be applied to grazing, but instead should be applied to all relevant programs in BLM, e.g. grazing, fire, recreation, wild horse and burro, travel, weeds, etc.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	[comment:1490-5; 104.10]5. Revisioll -Subpart 4180-Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration.Subpart 4180 has now been in effect for 20 years and has been the primary impediment to timely, appropriate and effective permit renewals and other grazing decisions. While the 05 Version of regulations provides for periodic review changes that would improve the application of the Subpart 4180 RHS, requests for such action in Idaho have been rejected and prevented by BLM. The demands put on BLM by the subsection coupled with inadequate guidance has left the job of interpretation and application of the subsection largely to the Field Office level. In Idaho the differences in the manner of obtaining and interpreting and applying monitoring information has been significantly different among the Field Offices. In the absence of standardized application ofthe subsection the practices and procedmes are left to political and often bias interpretation and application of this subsection.The 05 Version of Subpart 4180 has been highly political from the very beginning and throughout implementation. The standards are in large part natmal processes for which there are no direct measures or defined thresholds beyond qualitative opinions. Elements of the subsection demands conformance with standards that are not directly measurable and subsequently must rely on subjective methods and protocols that in turn lead to qualitative conclusions and determinations of conformance. The ambiguity and lack ofclearly defined thresholds for conformance with the standards, encourages or at least allow personal bias and/or political leaning to guide assessment or and application of05 Version of Subpart 4180.[comment end]
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	12	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	. BLM should move the land health standards from the grazing regulations to the planning regulations so that land health applies and is required to be considered for all multiple uses. We have seen circumstances where grazing is often identified as a causal factor for rangelands not meeting standards because the rangeland health assessment is mandated under livestock grazing. This requires a change in grazing management as "easy picking" for restrictive actions that are usually undue or ineffective in actually addressing any rangeland health issue. Other uses of rangelands have impacts, sometimes severe, to rangeland health and should be held to the same standards as livestock grazing when being permitted.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marnell	Lorraine		NM	998	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	*Review of allotment health conditions* at least every ten years.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marnell	Lorraine		NM	998	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	*Monitoring thresholds.* The triggering of a change of course (adaptive management) depends on both quantitative thresholds that require changes in an activity when crossed, and monitoring to detect whether thresholds have been crossed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	19	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	"Could the BLM use existing permits to address areas not achieving land health in grazing allotments?" o Livestock grazing management is a tool that could be used to address areas not achieving land health. Livestock grazing should be a tool that is considered in efforts to enhance sage-grouse habitat in areas that are not currently achieving land health. o If the intent is to address land health issues caused by factors other than current livestock grazing practices by implementing different prescribed grazing practices, the revised grazing regulations should consider mechanisms to incentivize adoption of the prescribed grazing practices to benefit other resource values and land uses. A direct payment or grazing fee offset process could be initiated when prescribed grazing treatments are implemented. Grazing fees could be reduced or waived when prescribed grazing treatments are implemented. Suspended use could be reactivated, or active use levels increased when implementing prescribed grazing treatments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	53	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	We support an Instruction Memo to all field offices to assess if rangeland management tools other than reductions in active AUMs will accomplish allotment objectives. BLM should document when other factors, such as fire, roads, wild horses, drought, or invasive species impact rangeland conditions. Changes to BLM management should address the cause of problems, not simply reduce livestock grazing. When grazing plays a role in problems, it is important to use appropriate management, not just reduce AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carter	Susan		NM	849	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Water quality monitoring as part of the land health evaluations is necessary.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	41	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	There are many potential impacts to the health, as defined by the science, not 4180, of BLM's rangelands. The WSGB urges the complete removal of subpart 4180 from the BLM Grazing Regulations and request the BLM to convene a group of scientist, including scientist from the resource and monitoring committee of the Society for Range Management and those currently within the BLM or recently retired, who are qualified to assist the BLM in how best to use the evolving rangeland health paradigm in the future.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	38	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The WSGB supports the use of science-based, quantitave, monitoring procedures to assess whether or not grazing management is contributing to achieve measurable allotment resource objectives. The narratives found in Subpart 4180 in the current BLM Grazing Regulations do not reflect the current science-based state of the art on the subject of rangeland health. The narrative, and regulatory direction to the BLM at Subpart 4180 have imposed on the National, state, and local BLM offices the requirement to conduct the assessment of the of BLM rangelands with procedures that are not supported by the Science of rangeland management, and requires the local BLM offices to make significant management decisions on the basis of "qualitative" assessments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	45	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The WSGB comments that the duties and responsibilities of Resource Advosory Councils should NOT be directed by Regulation, but should be determined at the State level after a process of consultation, coordination, and cooperation between the respective BLM State Directors, the State Governor's, and the members of the respective Resource Advisory Committies. The WSGB has attended meetings of Resource Advisory Committies/Councils and we have observed that the composition and expertise of the members on the various Resource Councils varies widly between these Councils.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	46	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The WSGB comments that members of these respective Advisory Councils seldom have the expertise to provide any meaningful advice to the BLM State Directors on range improvements, AMP's, or issues related to the rangeland health program on the BLM. These subjects should be removed from the Regulations as items to be discussed by these Councils. The WSGB comments that in order to diminish the opportunity for issues related to the political persuations of the members of these Advisory Councils, that the respective BLM State Director's and State Governors be provided the Regulatory authority to jointly establish agendas for the meeting of these Advisory Councils that will allow discussions on subjects of significant importance to both the BLM State Director and Governor.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlisle	Celeste	Return to Freedom Wild Horse Conservation	CA	1016	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The EA must address how the BLM will, without fail, manage public lands for grazing with their already-established Land Health Standards utilized in the decision-making process for determining when and for how long and whether or not grazing is appropriate in that place and at that time. Ecologic assessments of a range, and management decisions based purely on those assessments, remove regional or special interest pressure.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Subpart 4180 -Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration 4180.1 Fundamentals of rangeland health 4180.2 Standards and guidelines for grazing administration Comment: Subjective language, not science based.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329	24	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Subpart 4180 -Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration § 4180,1 Fundamentals of rangeland health. The authorized officer shall take appropriate action under subparts 4110,4120,4130, and 4160 of this part as soon as practicable but not later than the start of the ne)(t grazing year upon determining that e)(isting grazing management needs to be modified to ensure that the follo",.ing conditions e)(ist. (a) Watersheds are in, or are making significant progress toward, I3rol3erly functioning physical condition, including their upland, riparian wetland, and aquatic components; soil and plant conditions support infiltration, soil moisture storage, and the release of ',,rater that are in balance with climate and landform and maintain or improve ' ater quality, 'Iw'ater quantity, and timing and duration of flow. (b) [co logical processes, including the hydrologic cycle, nutrient cycle, and energy flow, are maintained, or there is significant progress toward their attainment, in order to support healthy biotic populations and communities. Many of these determination are based on opinion, possibly by individuals without any expertise in western land environments or technical training or experience. These determinations will not be based on quantitative data (the highlighted portions of a and b don't have any identified method to measure these). These are totally random and subjective decisions based on meaningless terms that allows the agency to utilize 'fluff" words, but not actually improve ecological conditions. Why is grazing the only use that must meet the overall goals for BLM lands? tcl ""Vater quality complies with State water quality standards and achieves, or is making significant progress toward achieving, established BLM management objectives such as meeting wildlife needs. (d) Habitats are, or are making significant progress toward being, restored or maintained for Federal threatened and endangered species, Federal Proposed, Category 1 and 2 Federal candidate and other special status species. Habitat for threatened and endangered {T&E} species take priority even if it causes other species to become threatened or endangered. Habitat for T&E species must be obtained without consideration of the economic investment or damages, multiple-use, or sustained yield. [60 FR 9969, Feb. 22, 1995] § 4180.2Standards and guidelines for grazing administration. (a) The Bureau of Land Management State Director, in consultation with the affected resource advisory councils where they e)(ist, will identify the geographical area for which standards and guidelines are developed. Standards and guidelines will be developed for an entire state, or an area encompassing portions of more than 1 state, unless the Bureau of Land Management State Director, in consultation with the resource advisory councils, determines that the characteristics of an area are unique, and the rangelands within the
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	36	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Section 4180: Subpart 4180: The WSGB comments that all of Subpart 4180 be removed from the BLM Grazing Regulations.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	19	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Section 4180.2(c)(1) Topic Standards and guidelines for grazing administration Comment/Observation The guidelines emphasize the authorized officer's authority to direct management actions but does not clarify the process by which this occurs. For example "(c)(1) If a standards assessment indicates to the authorized officer that the rangeland is failing to achieve standards or that management practices do not conform to the guidelines, then the authorized officer will use monitoring data to identify the significant factors that contribute to failing to achieve the standards or to conform with the guidelines." This statement is ambiguous and appears difficult to execute without further guidance. Action Requested Action: Guidelines should establish an adaptive management framework that clarifies the responsibilities of the authorized officer and the methods by which management decisions are made. Consideration should be given to additional coordination points with the state to identify areas of collaboration (e.g., sharing of data or pooling resources to enhance and restore habitat).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hutter	Fairfax		NJ	1001	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Removing the requirement to assess Land Health Standards on every allotment – The regulations say that the new regs will consider “where and how the BLM will evaluate the Land Health Fundamentals and Standards.” The agency is currently required to complete these as part of the permit renewal process. The agency has also been failing to meet Land Health Standards on many, many public lands allotments throughout the west. Instead of meeting the standards, it appears BLM plans to lower the bar of having to meet them.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Price	Donna		WI	859	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Removing the requirement to assess Land Health Standards on every allotment – The regulations say that the new regs will consider “where and how the BLM will evaluate the Land Health Fundamentals and Standards.” The agency is currently required to complete these as part of the permit renewal process. The agency has also been failing to meet Land Health Standards on many, many public lands allotments throughout the west. Instead of meeting the standards, it appears BLM plans to lower the bar of having to meet them. Expanding the use of categorical exclusions – i.e. completing fewer full and fair environmental analyses – and undermining public participation opportunities in the process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	alexandra	Kathryn		WA	654	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Removing the requirement to assess Land Health Standards on every allotment – The regulations say that the new regs will consider “where and how the BLM will evaluate the Land Health Fundamentals and Standards.” The agency has been failing to meet Land Health Standards on many, many public lands allotments throughout the west. Instead of meeting the standards, it appears BLM plans to lower the bar of having to meet them.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	581	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	New regulations must include water quality monitoring as part of the land health evaluations. They must ensure grazing management does not benefit primarily livestock, but preserves habitat value for native plant and wildlife species including native predators. They should ensure that this EIS and other NEPA analyses appropriately address habitat needs of species whose populations are jeopardized. They must prohibit destruction of native vegetation to increase forage for livestock and use peer-reviewed scientific and quantifiable methods of evaluating Land Health Standards at least once per 10 years.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Shephard	Ed	Public Lands Foundation		1128	7	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Land Health Standards The requirement, in the current Grazing Regulations, that grazing permittees must meet Land Health Standards must remain in Part 4180 of any revised grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Sabrina		NV	798	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Land Health evaluations- New science and techniques must be utilized! The massive undertaking yearly by BLM personnel to record, compile, and comply with all this data is causing a lag in land health decisions. The permittee can be utilized to help the range con through measurements of check points, photos, videos, etc. An integrated communications platform should be considered. Restructuring of the ideas and culture of land health from the bottom up. New science is available at a break neck pace. Using guidelines from the 1990s is not acceptable. Diverse utilization, flexible grazing periods, targeted grazing, outcome based initiatives should become the standard.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lagergren	Ginna		ID	570	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	It is alarming that the BLM has been failing to meet Land Health Standards on too many public lands allotments. The BLM should never lower the bar of having to meet them. There should never be any reduction in monitoring of grazing allotments and, in fact, there needs to be more oversight, not less. Montioring should include finding unauthorized grazing trespasses and particularly overuse of Public Lands that leads to degradation of land and watersheds that are so important to wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goetz	Katie	New Mexico Department of Agriculture		1115	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Integrating animals into land management can positively impact soil health, which is recognized by an increasing number of Natural Resources Conservation Service (NRCS) state offices, as well as by New Mexico's Healthy Soil Act passed in 2019. NRCS and NMDA recognize other soil health principles as being equally important: keeping soil covered, minimizing disturbance, maintaining a living root, and maximizing biodiversity. NMDA suggests BLM consider inclusion of the principle of animal integration as a conservation tool since animals like livestock can provide ecosystem services as minimal-till seeders and fertilizing agents.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	12	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Farm Bureau recommends that Part 4180 be removed from the BLM grazing regulations. We also recommend that the EIS include a state-by-state table or infographic illustrating annual levels of livestock grazing AUMs from 1994 to present time. We would also encourage the BLM to include data on the number of acres burned under the same time period.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Logan	donna		PA	221	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna		NM	1360	69	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Comment: 'Health' is not science based or quantitative and there can be different 'levels' of health. Focusing on 'assessing health' is subjective. Using scientifically defensible assessment methods will better inform managers of progress towards objectives that support "functions" and "processes" associated with rangeland ecosystems. Watershed function, nutrient cycling, energy flow, water quality and wildlife habitat and all other attributes described in § 4180.1(a-d) are not directly or solely impacted by livestock grazing. Extra ordinary burdens are placed on permittees and lessees as watershed functions are effected by several other interacting influences not associated with grazing. There are many assumptions when addressing the rangeland health concept. Rangeland Health concept should not be in regulation or as a standard or guideline associated with grazing management as methods do not exist that allow for defensible assessments. It is not possible to determine that grazing alone is causing observed outcomes unless an appropriate experimental design exists that allows for such a determination. Currently, 4180 does not adequately acknowledge or include permittees and lessees . Consulting, cooperating, and coordinating with permittees and lessees allows them to contribute to development and accomplishment of common goals related to BLM's grazing management objectives. Subpart 4180 must be deleted in its entirety and rewritten to include science based methodology, science based data gathering, and the development of long term trends. This can be accomplished by making use of scientists housed at Land Grant Universities who have the knowledge and experience in livestock grazing management and rangeland ecology.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	37	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM's excellent Technical Report, "Interpreting Indicators of Rangeland Health", version 4, clearly conveys in the "Intended Applications" page a recommendation of the inappropriate uses This "protocol is NOT to be used to: -- Identify the causes of resource problems -- Independently make grazing and other management changes -- monitor land or measure trend -- Independently generate national or regional assessments of rangeland health Subpart 4180 directs the BLM by Regulation to do ALL of these even tho the Tech Report says not to.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM has developed procedures to assess if rangeland health standards are met. While scientists outside BLM were involved with agency staff in developing these methods to assess standards, the final procedures and its use were under the control of BLM's grazing program. The use of these assessment procedures was most often carried out in the field by BLM grazing program staff. BLM's use of staff that advocate livestock to assess rangeland health standards constitutes a conflict of interest.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	19	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM currently interprets Section 4180.2(c) as allowing the BLM to apply any adverse rangeland health determination in a pasture (or discrete confined area enclosed by fence and/or natural topography) to another pasture(s) resulting in an adverse determination for such other pasture(s). In other words, BLM is extrapolating adverse determinations for resource concern(s) on "public lands" a single pasture to "public lands" located in other discrete pastures. This is done even though BLM's own monitoring data driving the adverse determination is specific to a pasture and not to any other pasture(s)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Findling	Karl		OR	1135	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	5. Rangeland Health should be of the highest priority. That emphasis would benefit all wildlife species, and landscape-scale forage improvements, would add-in fire resilience when paired with the use of native seed plantings, in lieu of monocultures created from non-native grasses. One study on the effects of grazing and Cheatgrass: http://www.greatoldbroads.org/wpcontent/uploads/formidable/44/Reisner-et-al.-2013_Cheatgrass_Grazing_highlighted.pdf 6. Add to Rangeland Health Survey's, the impact of road densities, as roads are known to negatively impact soil, riparian areas, native vegetation, and wildlife, especially in critical winter range and migration corridors. 7. Continued grazing destroys the Crypto-Biotic soils that help reduce further Cheatgrass, Medusahead, Ventanata, and Japanese Brome spread. 8. Voluntary relinquishment of allotments should be made available.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	15	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	4180 Topic Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration Comment/Observation Rangeland health assessments are performed on BLM parcels, however, the assessment does not consider the health of the greater landscape. Metrics should capture potential impacts of land use on adjoining properties and their effects on BLM parcels, especially on parcels that have no fencing or the fencing is in disrepair. Action Requested Action: Modernize guidelines by including landscape-level metrics to assess rangeland health. Section
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	18	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	* Extrapolation of determinations to other allotment, pasture, or ecological site boundaries BLM should be obligated to apply any adverse rangeland heath determination to a specific and discrete piece of "public lands", as opposed to extrapolating adverse determination upon "public lands" in other pasture(s)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	36	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	"Rangeland health" may be a valuable teaching tool, but should not be the monitoring program on which management decisions are made. This point is made in the document: "Interpreting Indicators of Rangeland Health "Technical Reference 1734-6 (Pellant, etal. 2018). Quantitative data are to be used to support the qualitative assessments/indicators. We applaud these efforts if quantitative data are collected on the site.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhalde	John		NV	1020	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	With regards to the outcome based grazing program that we are participating in some of the goals of the outcome based goals and objectives cannot be achieved both in the short-term and long-term. This is related to the wild horse population and the herd management area within which are allotments are located. The wild horses are well above the appropriate management levels for the herd management area. We have set and identified goals to meet which after two years in the program it is evident these will not be met.. Rangeland health is not improving and in some areas significant to size within the allotments we hold a grazing permit to graze which have crossed a threshold and will not recover while some areas are not meeting rangeland health objectives. This situation has been and currently impacts the economic viability of our public lands grazing operation. We have made operational changes annually and sometimes this is hard to anticipate associated with maintaining our base herd and determining the rotational grazing use for the year. Forage use or overuse is one point the other is utilization of the water that we hold a beneficial water right for livestock use. The concentrated use by wild horses in some areas utilizes the water from wells to the maximum capability and reduces or have eliminated our ability to utilize and rotate areas within the allotment. Yes as stated in FLPMA “multiple use and sustained yield” is a primary part of this law. BLM needs to comply with this law with regards to wild horses where the AML has been set thru the BLM land use plans. The result here is we cannot set outcome based grazing goals because they have not been achievable and this operation has been impacted financially effecting the economic viability of the family operation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	When rangeland health standards are not being met and the reasons are due to other contributing factors, not associated with current livestock practices, the other factors must be held accountable and should not reflect on the permittee. In order for rangeland health to improve, when it has been determined that standards are not to being met, all factors contributing to its decline must be addressed and made responsible through new management practices. This includes and is not limited to wildlife, horses and burros, plant and forage disease, pinion and juniper encroachment and other multiple uses. All contributing factors need to adapt to meet rangeland objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Jon	Sagebrush Habitat Conservation Fund	ID	891	9	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	We suggest several revisions to the Fundamentals of Rangeland Health at section 4180. Specifically, the regulations should add an additional metric to each state's Standards and Guidelines for carbon sequestration through intact shrubsteppe and grasslands. Additionally, the regulations should remove the availability of an administrative stay of BLM grazing decisions that implement "appropriate action" when livestock grazing has contributed to failures to meet land health standards.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	23	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	We recommend that BLM no longer be required by regulation to conduct a "rangeland health determination" focused solely on livestock grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	10	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	We recommend that all of Part 4180 be removed from the Grazing Regulations. Most range professionals and science-based published literature on this subject convey than an assessment of the "health" of rangelands should not be limited to an evaluation of any singular, specific use of the land. The current BLM Grazing Regulations at Part 4180 direct the BLM to take Administrative action against a livestock permittee if a qualitative assessment, not quantitative data, indicate a BLM concern that a causal factor on the land being grazed by a permittee is not "healthy" due to livestock grazing. We are seeing increased damage to rangelands from the overpopulation of horses on our allotments. We are managing for healthier lands and being punished because of the lack of management by the BLM. In addition, increased pressure from recreational use is causing some lands to not meet standards and again, we are being reduced because of the actions of others.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	11	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	We recommend that all of Part 4180 be removed from the Grazing Regulations. Most range professionals and science-based published literature on this subject convey than an assessment of the "health" of rangelands should not be limited to an evaluation of any singular, specific use of the land. The current BLM Grazing Regulations at Part 4180 direct the BLM to take Administrative action against a livestock permittee if a qualitative assessment, not quantitative data, indicate a BLM concern that a causal factor on the land being grazed by a permittee is not "healthy" due to livestock grazing. We are seeing increased damage to rangelands from the overpopulation of horses on our allotments. We are managing for healthier lands and being punished because of the lack of management by the BLM. In addition, increased pressure from recreational use is causing some lands to not meet standards and again, we are being reduced because of the actions of others.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	12	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	We recommend that all of Part 4180 be removed from the Grazing Regulations. Most range professionals and science-based published literature on this subject convey than an assessment of the "health" of rangelands should not be limited to an evaluation of any singular, specific use of the land. The current BLM Grazing Regulations at Part 4180 direct the BLM to take Administrative action against a livestock permittee if a qualitative assessment, not quantitative data, indicate a BLM concern that a causal factor on the land being grazed by a permittee is not "healthy" due to livestock grazing. We are seeing increased damage to rangelands from the overpopulation of horses on our allotments. We are managing for healthier lands and being punished because of the lack of management by the BLM. In addition, increased pressure from recreational use is causing some lands to not meet standards and again, we are being reduced because of the actions of others.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Meyer	Cathy	Lower Wind River Conservation District	WY	1384	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	We believe that rangelands should be managed for multiple uses. For one use (livestock grazing) to be held accountable for health of the rangelands based on pass-fail standards is not reasonable or scientific. If there is a problem (example invasive species) in an allotment, all users should agree to help remedy the problem (example allow intensive grazing of cheat grass even if the stubble height is one inch). All tools to manage grazing and other uses should be utilized. For example-if riparian areas are a concern, develop off-site water or utilize fencing. There have been instances in our area where fencing of riparian areas was not allowed. Allow flexibility in management.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	36	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	We believe BLM should also issue an Instruction Memo to all field offices to direct the appropriate AO to assess if rangeland management tools other than reductions in active AUMs will accomplish allotment objectives. This Administration, as soon as possible, should make clear to BLM that they are to use "all the tools in the toolbox" prior to reductions in active AUMs. Further, BLM should seek to apply the management actions to only those portions of the allotment that are not achieving allotment objectives rather than only halting grazing or reducing grazing use levels.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	15	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Under the existing rules, the "authorized officer shall take appropriate action under subparts 4110, 4120, 4130 and 4160 as soon as practicable but not later than the start of the next grazing year upon determining that existing grazing management needs to be modified to ensure that the following conditions exist." 43 C.F.R. § 4180.1 The current rule goes on to discuss riparian, ecological, watershed, and habitat values. Id. at (a)-(d). Standards and guidelines were to be developed for an entire state or an area covering multiple states, and grazing management must make significant progress toward meeting those standards and guidelines. Id. at § 4180.2. Neither the regulations, Manuals, nor handbooks develop any guidance on the minimum amount of monitoring data that must be developed, reviewed and analyzed before a determination on the progress toward standards and guidelines can be made. The BLM has issued various "technical references" to assist and improve monitoring techniques, but BLM's handbooks and Regulations do not provide any information on how monitoring data should be used to determine whether standards and guidelines are being met. Nor do the rules link a grazing decision to a technical reference. The Coalition and Counties recommend that BLM have developed a minimum of five years of monitoring data before a change in grazing can be authorized. Monitoring data is essential and demonstrates how the landscape is responding, potential causal factors, contributing factors, and climactic differences. The Coalition and Counties also recommends that the data conform to the Information Quality Act standards. It is essential that field offices rely on data that meets the Information Quality Act to ensure a defensible and responsible decision. This will also improve the durability of the ultimate decision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	14	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	TNC believes that the regulation language (§4180) largely provides for an effective Land Health Assessment and Evaluation process, informed by our work with the BLM in Oregon to better apply the Fundamentals through the Land Health Process. We do see opportunities to streamline the Land Health Process by making use of additional lines of evidence through remote-sensed products and more extensive use of photo monitoring to address standards. These additional lines of evidence also need to relate to larger areas - watersheds or large allotments instead of pastures - if there is to be any chance of keeping pace with mounting backlogs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ure	Amy			1352	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Therefore, in updating grazing regulations, provisions must be made to harmonize wildlife use with livestock use when evaluating rangeland health and provide each species with equal accountability for rangeland health without further reduction of the historic use of the land for livestock production.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	11	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	There is no apparent reason to have a different rendition of Rangeland Health in every state or region. The assessment and monitoring protocols are derived from the same handbooks regardless of where the studies are applied. For example the Interpreting Indicators of Rangeland Health (IIRH) is applicable for upland native vegetation, watershed, soils, seedings and annual grasslands regardless of the geographic location. Similarly, Streams / Wetlands and Water Quality health issues are assessed using the Proper Functioning Condition (PFC) protocol no matter the location or setting of the associated riparian system. Subpart 4180 needs to be revised in a manner that assures consistent application and with meaningful standards that have a definable threshold for compliance that is based on constant monitoring studies. Standards within the subpar must be relevant to the objectives presented in the TGA, FLPMA, and PRLA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	19	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The regulations should provide mechanisms for the public to participate in or contribute to rangeland health evaluations and, more generally, for the public to submit, and have considered in a timely way, monitoring and rangeland health data. Members of the public can provide the BLM with valuable information that can assist with the agency's management of grazing and public land health. Specifically, the public can enhance BLM's capacity to "get out on the land" and identify potential violations of land health standards and guidelines, places where the fundamentals of rangeland health are not being achieved, or places with exemplary practices. The regulations can specify requirements for data quality to assure that citizen and Bureau science meets reasonable data quality standards. See US Department of the Interior, Information Quality Guidelines Pursuant to Section 515 of the Treasury and General Government Appropriations for FY 2001, Section V.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	20	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The regulations should establish that rangeland health evaluations be led by a qualified specialist unaffiliated with the Field Office in which the allotment is located in order to reduce the pressure on local officials who interact daily with permittees and lessees and to enhance consistency and quality across the program.[8: Based on our review of Rangeland Health Assessments and Determinations, we have observed that quality varies considerably among BLM field offices, with many based on inadequate field inventory and analysis as well as failing to address all the landscape elements identified in the Fundamentals of Rangeland Health, and Standards and Guidelines for livestock grazing] The BLM has utilized this approach to conducting wilderness inventories and rapid ecological assessments.[9: e.g., Mojave Basin and Range REA (2010) was prepared by NatureServe.] The specialist could be a BLM employee from a different part of the organization or an external party such as an ecologist from the US Geological Survey or NatureServe. The Forest Service's enterprise teams also provide a possible model. The Forest Service has developed "enterprise teams" expert in specific disciplines to provide services (including land and resource evaluations) to units across the National Forest System.[10: See https://www.fs.fed.us/enterprise/service-lines/biology-range.php for information on Forest Service range enterprise teams.] The approach of creating independent teams expert in a specific evaluation process has the potential to not only protect the integrity of the evaluation but also yield efficiencies and cost savings.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cotter	Justina		AZ	437	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The proposal states that BLM will promote land health by “Considering where and how the BLM will evaluate the Land Health Fundamentals and Standards.” This appears to be double-speak. Instead of stepping up and complying with the current regulations, BLM proposes to weaken them even further by allowing the agency to choose when and if to evaluate compliance. This will not promote land health. Currently, the BLM is supposed to do this for all grazing allotments – analyze whether and to what extent each allotment is meeting the land health standards. In spite of this requirement, BLM land continues to suffer from degraded fish and wildlife habitat, denuded streams, and the replacement of native plants and grasses with invasive species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	19	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The notice indicates BLM may consider where and how to evaluate "Land Health Fundamentals and Standards." 85 Fed. Reg. 3411. BLM should strengthen the current framework to ensure that land health evaluations are completed every decade using the best available peer- reviewed scientific and quantifiable data collection methods and conducted at the site specific level to assist the agency in making appropriately responsive management decisions. The process should be open to the public for participation and input and, all data and related survey information should be made readily available to the public, posted on the Internet or other easily accessed public location.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	22	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The Livestock Groups recommend that all of Part 4180 be removed from the Grazing Regulations. A number of Rangeland Science and Ecological science publications, including the National Academy of Science book "RANGELAND HEALTH, New Methods to Classify, Inventory, and Monitor Rangelands, and BLM's Tech Report 1734 - 6 ("INTERPRETING INDICATORS OF RANGELAND HEALTH") convey that the subject of "land health" is currently an evolving paradigm. Most range professionals and science-based published literature on this subject convey than an assessment of the "health" of rangelands should not be limited to an evaluation of any singular, specific use of the land. The current BLM Grazing Regulations at Part 4180 direct the BLM to take Administrative action against a livestock permittee if a qualitative assessment, not quantitative data, indicate a BLM concern that a causal factor on the land being grazed by a permittee is not "healthy" due to livestock grazing. The Livestock Groups support the BLM's authority to use quantitative data from a monitoring program to support management actions to accomplish allotment objectives, but it is inappropriate to use an evolving paradigm on rangeland health
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	35	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The justifications for this WSGB comment are many. The National Research Council Book, " RANGELAND HEALTH new Methods to Classify, Inventory, and Monitor Rangelands" clearly states that the subject of "Rangeland health" is an evolving paradigm that deserves scientific research and that this subject is NOT to be used as a "decision tool".

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tague	Joe		MD	795	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The Fundamentals of Rangeland Health should be changed to land health and apply to all lands managed by BLM. 1. These Fundamentals should be located in a separate and distinct section of the CFR so as to clearly show that meeting these fundamentals needs to be considered in all management activities and authorizations. This would include the process to establishment and operation of the Resource Advisory Councils and the process to establish and update Standards and Guidelines for management activities and authorizations to meet or progress towards meeting the Fundamentals. This section would also include the fall back Standards for areas that do not have the appropriate Resource Advisory Council.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Hank	Nevada State Grazing Board N2 District	NV	1471	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The fundamentals of rangeland health, as defined by 43 CFR 4180 , identified a process to develop regional grazing standards and guidelines (S&Gs). This process required the authorized officer to take appropriate action no later than one year when it is determined that existing grazing management needs to be modified to ensure that the S&Gs were being met. However, the current regulation fails to identify or define what specific, quantitative resource information is needed to make an agency determination. Since then, regional grazing standards and guidelines have been adopted in Nevada. However , the guidance in these and most other S&Gs do not accurately describe the objectives that need to be met. Unmeasurable statements that cannot be accurately quantified or assessed at the grazing allotment or permit- level based on scientifically proven methods need to be avoided.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoffman	Ted		ID	1021	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The Fundamentals for Rangeland Health should only be used for planning purposes, and should themselves be reformed to reflect current conditions and current knowledge of proper resource management. They should not be included in the grazing regulations. Adverse rangeland health determinations must be applied to a specific, discrete piece of public lands and not extrapolated from adverse determinations from other public lands in separate pastures. Management changes to resolve adverse rangeland health determinations are seldom based on scientific or even logical determinations of cause. The standard solution is to cut numbers or AUM's. A requirement to demonstrate a causal connection between the determination and the solution should be made, requiring a preponderance of evidence standard of proof. Requiring management changes before the start of the next grazing year is no longer practical given the inadequate staffing and training of decision-makers. One solution is to require the development of one or several proposed solutions at the time of the adverse determinations. While this may appear count-intuitive, the quality of adverse determination decisions is also so poor that requiring the simultaneous proposal of solutions would delay the adverse determination and bring more discussion, particularly discussion with the permittee, into the process and improve both the determination and the solution decision process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hart	Charles	Society for Range Management	CO	1076	7	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The disclaimers listed in Technical Reference 1734-6 regarding the intended uses of rangeland health assessment should be included in any regulation or policy statement regarding rangeland health. These disclaimers are: Rangeland health assessments should not be used to: - Identify the cause(s) of resource problems. - Independently make grazing and other management changes. - Monitor land or determine trend. - Independently generate national or regional assessments of rangeland health.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	17	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The current language provides too many reasons the AO can use to reduce livestock grazing, including the reference to Part 4180. We also want to go back to the pre-Babbitt concept that the BLM must use monitoring, over time, to make reductions. At present, BLM at times uses nothing more that seasonal "utilization" to make reductions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	13	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The BLM should consider working with the NRCS to use the Rangeland Analysis Platform (https://rangelands.app/) to monitor rangeland health indicators. New and fewer indicators should be used, such as bare ground cover, perennial grass cover, shrub cover, annual grass cover, and tree cover. With the tools that are available, much of this can be monitored in almost real time and better decisions could be made using this kind of data. Rangeland Health Evaluations should not just affect grazing pennits and allotment management plans as they currently do (when grazing is identified as part of the cause for not meeting the standards). I recreation, wild horses, wildlife or any of the other multiple uses on BLM lands are contributing to the Rangeland Health Standards not being met, the BLM should consider making the necessary adjustments in those non-livestock uses to address rangeland health concerns. Livestock grazing should not be the only use that is subject to adjustments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Morrison	Colleen		IL	1006	6	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The BLM must comply with its requirement to assess land health standards as part of its grazing allotment permit process. The on BLM is barely meeting this requirement and this is an attempt to lower their standards even further.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallidge	Samuel		NM	1319	11	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	<p>Subpart 4180 Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration We recommend deletion of the entire subpart 4180 as currently written for the following reasons: * BLM misapplies the concept of Fundamentals of Rangeland Health by including it in standards and guidelines. It inappropriately focuses attention on assessing "health" - a subjective non-quantifiable term. * Use of "health" is not based in science, is a value laden term, and is limiting as it creates a false dichotomy where possible outcomes distill to "is" or "is not" healthy and cannot be realistically linked to broad array of possible biotic and abiotic environmental attributes that contribute to ecosystem sustainability. * Reliance on the Rangeland Health concept weakens the boundless qualities of science for informing decisionmakers of outcomes related to grazing management and other multiple uses of federally managed lands. Using scientifically defensible assessment methods will better inform managers of progress towards objectives. * Watershed function, nutrient cycling, energy flow, water quality and wildlife habitat and all other attributes described in § 4180.1(a-d) are not directly or solely impacted by livestock grazing, but by interacting assemblages of biotic and abiotic influences on a spatiotemporal basis. Scientifically defensible linkages do not exist that allow for assessment of conformance (§ 4180.2) as it relates to attributes described in § 4180.1. * Assessing watershed function, nutrient cycling, energy flow, water quality and wildlife habitat places a prejudicial and unachievable burden on livestock producers as these functions are effected by several other interacting influences not associated with grazing. * Application of the Rangeland Health concept in relation to grazing includes the following assumptions: o Assumes observations of hydrologic cycle, nutrient cycle, and energy flow, or whether they are making progress towards being restored and maintained, are solely the result of livestock grazing and it is able to determine causation relative to livestock grazing management outcomes. o Assumes that it is possible to quantify and determine significant progress towards properly functioning physical conditions is possible in a timely and cost effective manner. o Assumes that observed water quality is causally related to livestock grazing management. o Assumes use of techniques such as Indicators of Rangeland Health, a point-in- time subjective assessment, is capable of determining "health" of a given rangeland as related to a single-use such as livestock grazing. o Assumes that point-in-time assessments are meaningful with relation to ecosystem processes as related to livestock grazing. This is flawed, as these processes are not static. Point-in-time assessments fail to indicated a direction (improved v. degraded), or the rate of change. * Assumptions inherent with Rangeland Health regarding</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	14	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	<p>Subpart 4180.2 Standards and Guidelines for Grazing Administration Remove the following wording "(4) Habitat for endangered, threatened, proposed, Candidate 1 or 2, or special status species; and" Management of species falls under the jurisdiction of either the Fish and Wildlife Service or that State's wildlife management agency. The BLM should not attempt to seek authority over such. The provisions under (5) speaks adequately to their charge of providing functional habitat.</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Meeks	Shari	Sublette County Conservation District	WY	1353	7	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	<p>Subpart 4180 Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration. SCCD would like to see the BLM move the Standards for Rangeland Health from the grazing regulations to the planning regulations. SCCD feels that healthy rangelands should be a component that is assessed with every permitted activity that affects rangelands managed by the BLM. We have observed that grazing is often identified as the causal factor for rangelands not meeting standards because the rangeland health assessment is mandated under livestock grazing . Other uses of rangelands have impacts, sometimes severe, to rangeland health and should be held to the same standards as livestock grazing when being permitted.</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schickedanz	Jerry			1244	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Standards and guidelines were approved by the New Mexico State BLM Director and the Governor of New Mexico and submitted in 1999. The Sec. of Interior approved three of the four standards, the one not approved was Sustainable Communities and Human Dimension Standard. Community and Rancher sustainability need to be recognized as a part of a viable ecosystem. This standard should be reconsidered in this revision of the regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	37	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Specifically, BLM is currently interpreting Section 4180.2(c) in a way that gives BLM the discretion to disregard or even prohibit some of the "appropriate action[s]" listed and identified in the regulation to address rangeland health standards and guidelines. (This is one of our justifications for the complete removal of Part 4180 from the BLM Grazing Regulations.) The regulation explicitly speaks of "Appropriate action" meaning "implementing actions pursuant to subparts 4110, 4120, 4130, and 4160 of this part that will result in significant progress toward fulfillment of the standards." Subpart 4110 covers Permitted Use AUMs, Subpart 4120 covers Range Improvements, Subpart 4130 covers terms & conditions in a Grazing Permit, and Subpart 4160 covers decision-making. BLM also needs to recognize that other factors, such as wild horse damage, wildlife forage consumption, fire, or extended dry conditions are routinely responsible for adverse rangeland health determinations and occur irrespective of livestock grazing permitted use. If the BLM is to justify a decrease in AUMs, they must determine that livestock grazing management practices are the causal factors for the underling adverse conditions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Warren	Greg			1180	8	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Should other uses contribute to the achievement of land health? Yes, other uses as described in an up to date RMP should contribute to land health as envisioned for National Landscape Conservation System lands and other Public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	17	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Section 4810 could be incorporated into and under one title. Those that are economically affected must be included as well as local governments where the standards and guidelines will apply. Counties have a vested interest in what and how something affects its citizens/residents and revenues. Language must implement consultation, cooperation and coordination with affected permittees/ lessees, the state having lands or responsibility for managing resources within the area of the allotment, and the affected counties as well as the BLM. The BLM must assess the allotment ecological conditions, site potential and social, economic and cultural considerations of affected stakeholders. The parties must jointly develop measureable objectives that focus on rangeland ecological attributes that can reasonably improve with grazing management, identify desired outcomes for allotment management and the strategy to reach those desires. Monitoring must use applicable analyses that meet basic standards of scientific defensibility to include objective, repeatable and quantitative methods by which to evaluate monitoring outcomes relative to allotment objectives. Monitoring must develop true scientific short and long term trends.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387	40	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Section 4180: Subpart 4180: The WSGB comments that all of Subpart 4180 be removed from the BLM Grazing Regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	23	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Section 4180.2(d) (12): This section does not address those situations where any seeded species has a limited probability of success, and native species have the least chance of successfully establishing on a site. The native species may be available and if successfully established can achieve properly functioning conditions, but their chance of successfully establishing is low and substantially less than non-native species. The current regulations do not address that ecological reality, and proposed regulations need to.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	22	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Section 4180.2(c) "levels of grazing" all too often is interpreted as a utilization level, which often has an upper limit that is the same regardless of plant growth stage. Utilization should be used as a growing season tool. The effect of grazing on plants is due more to growth stage at which grazing occurs, the frequency for which the plants are grazed, the intensity of defoliation and the potential for growth before being grazed, and/or regrowth after grazing occurs. The combinations of these parameters are virtually unlimited and there are many potential outcomes for grazed plants, depending on how grazing occurs, not necessarily if it occurs within a one-size fits all limit. The level of use or utilization is only one factor and the effect varies greatly by plant growth stage. The regulations need to use language that addresses the parameters that affect grazing and their interactions, not just utilization.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Warren	Greg			1180	9	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Robust public involvement processes should be followed when evaluating land health standards indicators that simultaneously influence land health such as fire return intervals that are longer or shorter than what occurred naturally; recreational activities that disturb soil or vegetation; introduction or spread of invasive plants; livestock use; land treatments; roads, energy infrastructure and associated pollution to air and water, and urban/suburban development; wildlife including species of special concern; and wild horse and burro use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Daniels	Shannon		MI	22	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Removing the requirement to assess Land Health Standards on every allotment – The regulations say that the new regs will consider “where and how the BLM will evaluate the Land Health Fundamentals and Standards.” The agency is currently required to complete these as part of the permit renewal process. The agency has also been failing to meet Land Health Standards on many, many public lands allotments throughout the west.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Rankin		NM	1179	10	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Remove the current language in its entirety in Section 4180.1 Fundamentals of rangeland health. Current language is not representative and does not encompass the full spectrum of 'rangeland health'.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Vonda		NM	899	7	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Remove the current language in its entirety in Section 4180.1 Fundamentals of rangeland health. Current language is not representative and does not encompass the full spectrum of 'rangeland health'. Also remove Section 4180.2. Standards and guidelines for grazing administration in its entirety. Current regulations fail to include all parties that will be, or are, affected by these standards and guidelines. Section 4810 could be incorporated into and under one title. Those that are economically affected must be included as well as local governments where the standards and guidelines will apply. Counties have a vested interest in what and how something affects its citizens/residents. Language must implement consultation, cooperation and coordination with affected allotment owners, the state having lands or responsibility for managing resources within the area of the allotment and the affected counties as well as the BLM. The BLM must assess the allotment ecological conditions, site potential and social, economic and cultural considerations of affected stakeholders. The parties must jointly develop objectives that focus on rangeland ecological attributes that can reasonably improve with grazing management, identify desired outcomes for allotment management and the strategy to reach those desires. Monitoring must use applicable analyses that meet basic standards of scientific defensibility to include objective, repeatable and quantitative methods by which to evaluate monitoring outcomes relative to allotment objectives. Monitoring must develop true scientific short and long term trends.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hart	Charles	Society for Range Management	CO	1076	6	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Rangeland Health is a land and ecosystem issue and needs to be used on all rangelands not just in the grazing regulations. Consider incorporating an updated definition in energy development, recreation, mining, wildlife habitat, etc. Livestock grazing is not the only land use that affects land health. Every use that affects land health should be managed to maintain a properly functioning ecosystem capable of providing for desired goods and services into the future or should provide acceptable mitigation for adverse impacts that cannot be minimized or avoided.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klein	Tammy	Central Valley and Penasco Soil and Water Conservation Districts	NM	1144	9	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Rangeland health- Health is not based on science, but pie in the sky, nothing can be measured and linked to environmental attributes. Rangeland health largely may blame livestock regarding ecosystem functions. It is not possible that grazing alone is causing ALL problems if no data or peer science review is done except on just on the opinion of an authorized officer.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	23	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Rangeland Health evaluations should be simplified and modernized Rangeland Health evaluations take too long and use up too much range staff time and resources. The BLM should simplify and modernize these evaluations using remote sensing where appropriate. Only data helpful in making decisions should be collected. The local universities and the Society for Range Management could be utilized in determining how to evaluate rangeland health quickly and effectively.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sonntag	Carla	New Mexico Business Coalition	NM	852	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Rangeland conditions are affected by many things, such as rainfall, temperature and topography; livestock grazing is not the sole influence of the land's condition. The condition or health of the rangeland cannot be determined over a short time period because that would only provide a snap shot of the different elements impacting the land. Making a short term Rangeland Health assessment could provide false or misleading results due to factors such rainfall, temperature, season or wildlife. A short term Rangeland Health assessment should not be used to develop trends for the same reasons.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cozzens	Paul	Iron County Commission	UT	1492	7	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Promote land health and recognize that livestock is not the single use responsible for achieving land health.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	13	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Part 4180 should be removed from the Grazing Regulations. Current BLM Grazing Regulations 4180 improperly direct BLM to act on qualitative assessments, not quantitative data. Rangeland health determinations should be based on quantitative data and not focused solely on livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Blair	Dan			1190	9	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Our recommendations: * Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. * Include water quality monitoring as part of the land health evaluations. * Disclose underlying Indigenous land claims and address environmental justice issues. * Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. * Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Meyer	Cathy	Lower Wind River Conservation District	WY	1384	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Our District supports all uses being responsible for taking care of the land. The biggest threat to rangelands in our area that needs immediate correction is the growing number of feral (wild) horses. Livestock grazers will never have a chance to maintain or improve the health of the land without the removal of excess horses whose numbers are 10-20 times AML in our area and are increasing every year. We propose that every permittee who has horses in their allotment be allowed to have five feral "wild" horses per year to train and use as they see fit. Those horses would be spayed or neutered to prevent any breeding of feral (wild) horses. Over time, this practice would reduce the number and reduce the cost of long-term care in outside holding facilities. Further, we support the spay and neutering of all gathered horses. We do not support the turn back of gathered horses to the rangelands especially when the goal is to provide hybrid vigor and more colorful herds. The BLM should not be competing with local folks who breed and raise horses for their livelihood.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	42	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Original text: 4180.1 Fundamentals of rangeland health 4180.2 Standards and guidelines for grazing administration Proposed text: delete original text

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	60	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	<p>Original text: § 4180.1 Fundamentals of rangeland health. The authorized officer shall take up appropriate action under subparts 4110, 4120, 4130, and 4160 of this part as soon as practicable but not later than the start of the next grazing year upon de-termining that existing grazing man-agement needs to be modified to ensure that the following conditions exist. (a) Watersheds are in, or are making significant progress toward, properly functioning physical condition, includ-ing their upland, riparian-wetland, and aquatic components; soil and plant conditions support infiltration, soil moisture storage, and the release of water that are in balance with climate and landform and maintain or improve water quality, water quantity, and timing and duration of flow. (b) Ecological processes, including the hydrologic cycle, nutrient cycle, and energy flow, are maintained, or there is significant progress toward their attainment, in order to support healthy biotic populations and commu-nities. (c) Water quality complies with State water quality standards and achieves, or is making significant. progress toward achieving, established BLM management objectives such as meeting wildlife needs. (d) Habitats are, or are making sig-nificant progress toward being, re-stored or maintained for Federal threatened and endangered species, Federal Proposed, Category 1 and 2 Federal candidate and other special status species. Proposed text: delete original text above Original text: § 4180.2 Standards and guidelines for grazing administration. (a) The Bureau of Land Management State Director, in consultation with the affected resource advisory councils where they exist, will identify the geo-graphical area for which standards and guidelines are developed. Standards and guidelines will be developed for an entire state, or an area encompassing portions of more than 1 state, unless the Bureau of Land Management State Director, in consultation with the re-source advisory councils, determines that the characteristics of an area are unique, and the rangelands within the area could not be adequately protected using standards and guidelines devel-oped on a broader geographical scale. (b) The Bureau of Land Management State Director, in consultation with af-fected Bureau of Land Management re-source advisory councils, shall develop and amend State or regional standards and guidelines. The Bureau of Land Management State Director will also coordinate with Indian tribes, other State and Federal land management agencies responsible for the manage-ment of lands and resources within the region or area under consideration, and the public in the development of State or regional standards and guidelines. Standards and guidelines developed by the Bureau of Land Management State Director must provide for conformance with the fundamentals of § 4180.1. State or regional standards or guidelines de-veloped by the Bureau of Land Manage-ment State Director may not</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmick	Darcy	J. R. Simplot Company Land & Livestock Division	ID	817	86	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	OLD TEXT Subpart 4180-Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration NEW TEXT Subpart 4180-Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration RATIONALE Subpart 4180 should be removed from Part 4100 for any one of three reasons, though there are likely many others: First, BLM have referenced or incorporated (in whole or in part) these rangeland heath standards into the applicable land use plan making such rules now redundant. Second, Subpart 4180 unlawfully trumps the land use planning process as prescribed by the Federal Land Policy and Management Act, 43 U.S.C. 1712. The planning process should prescribe objectives, i.e. standards and guidelines, for livestock management. Third, there have been scholarly writings or articles which provide serious question as to the propriety and applicable of standards and guidelines across an entire State or a Region. See, for example, a writing by Dr. Lamar Smith, entitled "Rangeland Health Issues" dated August 29, 2017. Fourth, consistent with the Third point, the standards and guidelines for any particular State or Region have no real meaning. This is demonstrated by a confusing decision issued by the IBLA in Borba Land and Cattle LLC, IBLA 201437 (Order dated December 18, 2014), wherein the Board stated at page 56 that "Judge Sweitzer rejected BLC's arguments that BLM violated the provisions of 43 C.F.R. § 4180.2(c). BLC contends BLM improperly relied upon Standards applicable only to Nevada's Northeastern Great Basin Area, when Nye County is in the Mohave Southern Great Basin Area according to the Resource Advisory Committees (RACs) that developed the Standards. The ALJ disagreed, noting 'those RACs were organized along county [,] but the county lines do not always conform to the boundaries of ecological sites and plant communities. The . . . rangeland ecological sites and native plant communities within most of the LSVUA, unlike the rest of Nye County, are those typically found within the Northeastern Great Basin Area.' ... We agree the ALJ properly concluded BLM's reliance on the Northeastern Great Basin Area Standards this case was rational and did not constitute a violation of 43 C.F.R. § 4180.2(c)." How can this be if the standards and guidelines are truly applicable to a particular State or Region? According to the IBLA in Borba, it seems BLM can pick and chose what standards and guidelines it applies regardless of the designated State or Regional to which they are/were applied, with approval of the Secretary. This should be prohibited if the standards and guidelines for any particular State or Region have any meaning.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	34	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	OCA recommends that all of Part 4180 be removed from the Grazing Regulations. A number of Rangeland Science and Ecological science publications, including the National Academy of Science book "RANGELAND HEALTH, New Methods to Classify, Inventory, and Monitor Rangelands, and BLM's Tech Report 1734 - 6 ("INTERPRETING INDICATORS OF RANGELAND HEALTH") convey that the subject of "land health" is currently an evolving paradigm. Most range professionals and science-based published literature on this subject convey than an assessment of the "health" of rangelands should not be limited to an evaluation of any singular, specific use of the land. The current BLM Grazing Regulations at Part 4180 direct the BLM to take Administrative action against a livestock permittee if a qualitative assessment, not quantitative data, indicate a BLM concern that a causal factor on the land being grazed by a permittee is not "healthy" due to livestock grazing. OCA supports the BLM's authority to use quantitative data from a monitoring program to support management actions to accomplish allotment objectives, but it is inappropriate to use an evolving paradigm on rangeland health (which is currently a qualitative assessment not grounded in quantitative data) to apply punitive action against a livestock permittee. We recommend that BLM no longer be required by regulation to conduct a "rangeland health determination" focused solely on livestock grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	33	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	OCA does not believe that the advisory councils have the requisite expertise in specific rangeland health standards or other duties assigned to them during the Rangeland Reform '94 era. In order to empower those with expertise and ensure land health standards are accurately applied, OCA recommends that the reference to advisory councils be deleted from these grazing regulations
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	15	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	NCA recommends that BLM no longer be required by regulation to conduct a "rangeland health determination" focused solely on livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	17	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Modifying §4180 to specifically direct the BLM to assess the Fundamentals at watershed scales using a more limited set of key functional groups, taxa, and soil properties based on best available science would help managers improve Land Health Assessment and Evaluation efficiency and effectiveness.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	HANSEN	NIELS		WY	794	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Land Health Standards: The Land Health Standards should be moved to a different section of the BLM regulations. All multiple-uses should be helld to standards equally. As is grazing is the only use that is held to and required to make adjustments to address concerns or identified issues.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Jeremy		OR	931	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Land health standards need to updated to be more realistic. For example the same standard should not apply to both a year round stream and a seasonal stream. DEQ classifications of streams are not always accurate. Those standards should be based on what the stream has accurately done not what it should do. If a stream has not met the standard for temperature the past 15 years maybe the standard is unrealistic.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Lamar		TX	814	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	It would be desirable to eliminate the use of the word "standard" from the consideration of rangeland health, since it implies a degree of quantitative and science-based measurement that simply does not exist. Replacing "standard" with something like "desired conditions", or "rangeland health goals" would be preferable, since they imply qualitative descriptions of the desired attributes. Barring that, it is recommended that the regulations and BLM's instructions on evaluating rangeland health should be revised to emphasize that the process currently used for assessing rangeland health "standards" is qualitative and subjective, cannot be used for monitoring, and should not be reported as acres meeting or not meeting range health "standards".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	16	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	It is a conflict of interest for either a rancher or BLM's range program staff to conduct ecological assessments for rangeland health standards.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ziemann	Lois		CO	644	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Include water quality monitoring as part of the land health evaluations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bradshaw	Charlie		WY	1379	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	In the Grazing Regulations themselves we do not see too many Standards or Guides that we think need to change changed or addressed except for clarifying who will complete the monitoring needed to reissue the leases? We would like to see it clarified that local offices are responsible for monitoring. Also, if each allotment will have to be monitored before the lease is issued then there are not enough personnel on-the-ground to complete the requirement before each permit expires. We recommend the permittees be allowed to learn the monitoring that is required to assist BLM personnel. Permittees can meet with BLM personnel in a school type setting to learn the requirements so BLM personnel will know that each monitoring technique is consistent and meets BLM standards.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ruch	Jeff	PEER		1131	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	In order to meet its statutory conservation mandates, BLM should suspend grazing on any allotment not meeting Standards for Rangeland Health until those lands have recovered.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Bricanah	American Wild Horse Campaign	VA	966	15	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	If the BLM wants to move to management of large areas with a single NEPA assessment of land health fundamentals, it should be sure to retain careful consideration of all criteria that can be used to define similar impacts. Land health fundamentals outline provisions of properly functioning watersheds, ecological process maintenance, water quality, and wildlife habitat restoration. Lumping large numbers of grazing allotments into a single land health assessment removes the level of detail needed to adequately assess individual allotment issues and harms the public's ability to provide meaningful input during the decision process. Thus, the BLM must instead provide the public with more opportunity for evaluation of site-specific proposals, not less. Public workshops should be planned in order to gather detail on criteria that may be considered, and local Resource Advisory Council input could assist with additional suggestions on proposed guidelines.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Warren	Greg			1180	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	How can the BLM continue to look to watershed or landscape evaluation of land health to achieve coordinated management across allotment boundaries? The timely revision of RMPs should be the primary approach for providing for integrated resource management on Public lands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	32	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	GENERAL COMMENTS: Comments regarding general issues that were not listed as potential topics to be addressed by the grazing regulation revisions in BLM's scoping materials that were made available prior to the scheduled public scoping meetings are detailed below. Exchange of Use: This is an issue we are particularly concerned about because we currently have two BLM allotments for which our use of private forage is accounted for by the BLM on an Exchange of Use basis, and another allotment for which our private land forage is accounted for based on Percent Public Land factors. The local BLM field office expressed its desire to convert our permit that is administered on a Percent Public Land basis to an Exchange of Use basis during the ongoing permit renewal process (which has been drawn out over many years) and pressured us into securing private grazing leases for unfenced private forage that has historically been allocated via Pecent Public Land factors. Exchange of Use provisions in the grazing regulations should clarify that an Exchange of Use agreement and associated private grazing lease are not required for a grazing permittee in an "open range" or "fence out" state to receive credit for private forage that is available upon unfenced private land within a BLM grazing allotment. In cases where multiple permittees run in common in an allotment/grazing unit, credit for such unfenced private forage that is not secured under a private grazing lease should be apportioned to each permittee on a proportional basis commensurate with their active AUMs authorized on the public land portion of the allotment/grazing unit. Conflicting Uses: This is another issue we are particularly concerned about because as mining operations within our BLM grazing allotments have expanded, our available forage base and access to livestock watering sources has been squeezed down, often out of proportion to the actual impacts caused by the expansion (adjustments made were greater than actual forage losses, or the impacts to forage availability were more closely tied to loss of available water rather than loss of total accessible acreage). The grazing regulations should specify that whenever livestock grazing is reduced due to implementation of a conflicting use (mining, habitat improvement, etc.) the grazing reduction will be quantified based upon a determination of the actual reduction in the livestock carrying capacity due to the change in use based upon quantitative monitoring. Quantitative Monitoring: Monitoring is another issue we are deeply concerned about. Qualitative assessments, dubious interpretations of quantitative data, and arbitrary decisions to ignore specific quantitative data have all been mechanisms used to impose management decisions upon us that were otherwise unsupported. Quantitative monitoring efforts should be tailored to address allotment specific objectives that are impacted by grazing activities. As
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	18	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Further, consistent with 43 USC §1903(a) and BLM Handbook 4180-1, Chapter 3, sections G and H, the regulations should require that the BLM publish online and in a timely way its rangeland health evaluations for allotments along with an annual schedule for performing rangeland health evaluations. The information should be easily accessed and searchable by the public. As of now, the information is not readily available to the public and the most recent Rangeland Inventory, Monitoring, and Evaluation Report (which is a summary and does not provide specific information on allotment conditions) published online is from 2015.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Pauline	Otero County Cattleman's Association		1201	13	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Delete the current language in its entirety in Section 4180.1 Fundamentals of rangeland health. Current language is not representative and does not encompass the full spectrum of 'rangeland health'. Also delete Section 4180.2. Standards and guidelines for grazing administration in its entirety. Current regulations fail to include all parties that will be, or are, affected by these standards and guidelines.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Terry	Otero County Cattleman's Association		1201	13	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Delete the current language in its entirety in Section 4180.1 Fundamentals of rangeland health. Current language is not representative and does not encompass the full spectrum of 'rangeland health'. Also delete Section 4180.2. Standards and guidelines for grazing administration in its entirety. Current regulations fail to include all parties that will be, or are, affected by these standards and guidelines.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stone	Gary	Otero County Cattleman's Association	NM	1201	13	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Delete the current language in its entirety in Section 4180.1 Fundamentals of rangeland health. Current language is not representative and does not encompass the full spectrum of 'rangeland health'. Also delete Section 4180.2. Standards and guidelines for grazing administration in its entirety. Current regulations fail to include all parties that will be, or are, affected by these standards and guidelines.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	15	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Delete the current language in its entirety in Section 4180.1 Fundamentals of rangeland health. Current language is not representative and does not encompass the full spectrum of 'rangeland health'.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Scarbrough	Gary	Otero County Public Land Use Advisory Council	NM	1202	9	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Delete the current language in its entirety in Section 4180.1 Fundamentals of rangeland health. Current language is not representative and does not encompass the full spectrum of 'rangeland health'.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doverspike	Mark		OR	994	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	COORDINATING THE STANDARDS AND GUIDELINES per 4180.2 should include the permittee. No one knows that land better than the permittee. And often the permittee is the person who knows the land over the longest period of time. Government employees come and go on a regular basis of five or less, but often the permittee has been there generations and has the advantage of seeing landscape change over decades, not a couple years. A rancher knows if you don't take care of the grass and environment, you can't survive over the long term.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Hank	Nevada State Grazing Board N2 District	NV	1471	7	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Both the current best available science and the Board suggest that the current S&Gs for rangeland health in Nevada are too general to accurately measure or assess the condition of public lands. Through this regulatory update, the Board would support the removal of 43 CFR 4180 and the resulting rangeland health S&Gs in an effort to improve positive, effective management decisions. Currently, the application of this regulation does not improve any grazing practices or natural resource management in general. As a replacement for this regulation and the S&Gs, the Board suggests that the BLM administers guidelines for management on an allotment by allotment basis. Specifically, the Board asks that these suggested guidelines be based on realistic resource objectives, on-site potential, and focus on active collaboration and involvement with the affected permittees. Similar to comments found above, the Board maintains that achieving resource allotment objectives would be more realistic if they are based on cooperative development of AMPs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	25	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM should set measurable specific required sideboards for "significant progress". Many of the state area RAC standards do not effectively comply with the current Regs - example in regards to protecting biodiversity. BLM must ensure that all local standards are made much stronger and more protective.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	24	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM should set measurable specific required sideboards for "significant progress". Many of the state area RAC standards do not effectively comply with the current Regs - example in regards to protecting biodiversity. BLM must ensure that all local standards are made much stronger and more protective.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klein	Tammy	Central Valley and Penasco Soil and Water Conservation Districts	NM	1144	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM needs to use consistent data and methods that remove opinion and bias. Range sciences such as New Mexico State University has methods of measuring rangeland health that is proven science and consistent data that should be used by the BLM. One example would be if a ranching allotment meets all measurements of being in good condition but permitted livestock numbers may be cut because of threatened or endangered species. If the range is in good health, why would a rancher be punished by getting livestock numbers cut?

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	20	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Authorization for Water Resource Development 43 CFR § 4180.2(a) states, in relevant part: The Bureau of Land Management State Director, in consultation with affected Bureau of Land Management resource advisory councils, shall develop and amend State or regional standards and guidelines. The Bureau of Land Management State Director will also coordinate with Indian tribes, other State and Federal land management agencies responsible for the management of lands and resources within the region or area under consideration, and the public in the development of State or regional standards and guidelines. Numerous references in 43 CFR § 4120.3-2(c) make it clear that the resources referenced in 43 CFR § 4180.2(a) include water resources. In addressing the development of water resources, 43 CFR § 4120.3-2(b) states: Subject to valid existing rights, title to permanent range improvements such as fences, wells, and pipe-lines where authorization is granted after August 21, 1995 shall be in the name of the United States. The authorization for all new permanent water developments such as spring developments, wells, reservoirs, stock tanks, and pipelines shall be through cooperative range improvement agreements. A permittee's or lessee's interest in contributed funds, labor, and materials will be documented by the Bureau of Land Management to ensure proper credit for the purposes of §§ 4120.3-5 and 4120.3-6(c). The State of Idaho has statutory permitting processes for water resource development. These processes are intended to protect life and property while achieving optimum use of Idaho's water resources. Examples include the State of Idaho's permitting processes for water rights, well construction, and construction or modification of dams. The State of Idaho also has a comprehensive planning process to guide water resource conservation, development, and management. Streams, springs, lakes, and aquifers on federally managed land are rarely contained entirely within federal jurisdiction. Such water resources are nearly always shared with landowners and water users outside BLM's purview but within State jurisdiction. Because of their more comprehensive perspectives, the States are best positioned to understand the impacts of individual development actions on the entire water resource and to determine whether such proposals are consistent with State law and water resource conservation, development, and management policy. For that reason, BLM standards and guidelines for grazing administration should affirm that water development proposals are subject to State review and permitting requirements.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	DeBolt	Ann		ID	724	3	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Any new Grazing Regulations must include water quality monitoring as part of the land health evaluations, and must absolutely forbid the destruction of native vegetation to increase forage for livestock.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Rankin		NM	1179	11	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Also remove Section 4180.2. Standards and guidelines for grazing administration in its entirety. Current regulations fail to include all parties that will be, or are, affected by these standards and guidelines. Section 4810 could be incorporated into and under one title. Those that are economically affected must be included as well as local governments where the standards and guidelines will apply. Counties have a vested interest in what and how something affects its citizens/residents. Language must implement consultation, cooperation and coordination with affected allotment owners, the state having lands or responsibility for managing resources within the area of the allotment and the affected counties as well as the BLM. The BLM must assess the allotment ecological conditions, site potential and social, economic and cultural considerations of affected stakeholders. The parties must jointly develop objectives that focus on rangeland ecological attributes that can reasonably improve with grazing management, identify desired outcomes for allotment management and the strategy to reach those desires. Monitoring must use applicable analyses that meet basic standards of scientific defensibility to include objective, repeatable and quantitative methods by which to evaluate monitoring outcomes relative to allotment objectives. Monitoring must develop true scientific short and long term trends.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	16	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Also delete Section 4180.2. Standards and guidelines for grazing administration in its entirety. Current regulations fail to include all parties that will be, or are, affected by these standards and guidelines.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Scarbrough	Gary	Otero County Public Land Use Advisory Council	NM	1202	10	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Also delete Section 4180.2. Standards and guidelines for grazing administration in its entirety. Current regulations fail to include all parties that will be, or are, affected by these standards and guidelines.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	39	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Additionally, BLM should be obligated to make any adverse determinations specific to grazing "practices" or to grazing use "levels" instead of assuming the determination applies to both. Section 4180.2(c) explicitly directs the BLM to make its rangeland heath determination specific to "existing grazing management practices" or "existing ... levels of grazing use." However, when BLM decides to make an adverse determination as to "existing grazing management practices," as opposed to grazing use "levels," BLM is still relying upon the first condition in Section 4110.3-2(b) (e.g., "not consistent with the provisions of subpart 4180") to reduce the level of grazing use, which decreases the permitted use AUMs.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Simkins	Connie	N-4 State Grazing Board	NV	1410	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	About the same time, the BLM released Technical Reference 1734-6, Interpreting Indicators of Rangeland Health. Now in its fourth version (Pellant, et al. 2005), this agency handbook has repeatedly cautioned that the qualitative methods included were not to be used to: * Independently make grazing and other management changes. * Identify the cause(s) of resource problems; or, * Monitor land or determine trend. Based on the qualitative and subjective approach associated with this field assessment method, the N-4 Board would strongly resist any effort to institutionalize the use of this assessment method to either evaluate permitted grazing practices or to guide future grazing management decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	12	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	7) Rangeland standards for health and ecological restoration. The language of the BLM's announcement suggests the agency proposes to reduce standards for public lands health. In fact, it appears that the BLM may even propose to remove the requirement to assess Land Health Standards on every allotment. The regulations say that the new regulations will consider "where and how the BLM will evaluate the Land Health Fundamentals and Standards." We note that BLM is currently required to complete these as part of the permit renewal process; however, our experience is that this has not occurred. The agency has failed to meet Land Health Standards on many public lands allotments throughout the west. Instead of meeting the standards, it appears BLM plans to lower the bar or even remove the bar rather than trying to achieve them. The Broads believe that quality and quantity of native vegetation including grass, forb and shrub species; riparian areas and aquatic habitats; native fish and wildlife species; and other resources such as cultural resources are at risk. All are key resources that need to be analyzed in the context of any potential changes in management and where degradation may or will occur, those actions cannot proceed. Criteria that need to be measured and analyzed include effects on wilderness characteristics; fish and wildlife species including TES; water quality and quantity including sedimentation, turbidity and other parameters of water quality; quantity and quality of riparian vegetation including species abundance, composition and distribution and potential for restoration; the spread of non-native exotic plant species such as cheatgrass and medusahead; and quality and quantity recreational use especially including quiet recreation. As stated above, the Broads recently provided extensive comments on the BLM's DEIS for the S.E. Oregon Resources Management Plan. Per the DEIS, rangeland evaluations have been completed very slowly by the BLM (approximately every 10 years), and it likely will take many years for rangeland standards to be evaluated in all of the units. Since implementation of the 1995 grazing regulations for rangeland health and standards (CFR, 18 Title 43, Part 4180), according to the DEIS, only "78 of the 198 allotments within the planning area (39%) have had a rangeland health evaluation completed, of which 61 were not meeting Standards. Of the 61 not meeting Standards, 59 were found to not be meeting due to existing livestock grazing management" (DEIS Subsection 3.8.3, Livestock Grazing and Rangeland Management, Page 3-39, Lines 22 35). Removing the requirement to assess land health standards will simply allow our public lands and their natural resources to deteriorate at an even more alarming rate. While the existing standards at least laid the groundwork for corrective action, BLM's proposal to reduce or eliminate grazing standards is unacceptable and irresponsible. All it
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	20	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	9) BLM must require that all grazing allotments continue to be evaluated for meeting Land Health Standards at least every decade using peer-review scientific and quantifiable survey methods. In addition, BLM must include water quality and quantity monitoring as part of the rangeland health evaluations for riparian areas, seeps and springs, and aquatic habitats. When Land Health Standards are not met, BLM must implement grazing practices that allow improvement of ecological health. These must include reducing stocking density or eliminating livestock use for extensive periods of times. Other practices must include shortening rotations on degraded pastures and suspended permits for noncompliance of Land Health Standards.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	France	Tom	National Wildlife Federation		1237	6	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	5) Removing the requirement to assess Land Health Standards on every allotment - The scoping document states that the new regulations will consider "where and how the BLM will evaluate the Land Health Fundamentals and Standards."5 The agency is currently required to complete these evaluations as part of the permit renewal process. These evaluations are vital to ensuring that public lands remain healthy and viable. Across the West, BLM is failing to meet land health standards Rewriting regulations to reduce these standards, or requirement to evaluate lands will not resolve the existing problem, but will instead pose a serious threat to our public lands
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	20	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	43 CFR § 4180.1(a) Fundamentals of Rangeland Health Farm Bureau and CCA recommend that Part 4180 be removed from the BLM grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	17	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	43 C.F.R. § 4180.1(a) Fundamentals of rangeland health. PLC and CCA do not believe that the advisory councils have the requisite expertise in specific rangeland health standards or other duties assigned to them during the Rangeland Reform '94 era and believe that the reference to advisory councils be deleted from these grazing Regulations. CCA and CO PLC recommends that all of Part 4180 be removed from the Grazing Regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	17	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	43 C.F.R. § 4180.1(a) Fundamentals of rangeland health. Part 4180 should be removed from the Grazing Regulations. Current BLM Grazing Regulations 4180 improperly direct BLM to act on qualitative assessments, not quantitative data. Rangeland health determinations should be based on quantitative data and not focused solely on livestock grazing. Changes in grazing status 43 CFR 4110.3 should be changed to reflect the above: "The authorized officer shall periodically review the level of active use specified in a grazing permit/lease and may make changes to the terms and conditions as needed to accomplish allotment objectives. The AO shall first determine if livestock grazing is the causal factor for not achieving allotment objectives based on long-term rangeland monitoring trends. If the current livestock grazing program is determined to be the causal factor, the AO shall first implement changes in the management program to include, but not be limited to, changes in seasons of use, duration and timing of use, or rangeland improvements to accomplish a trend towards achieving allotment objectives before reducing active AUM's. Any reductions in active use will be placed in suspension." We support an Instruction Memo to all field offices to assess if rangeland management tools other than reductions in active AUMs will accomplish allotment objectives. BLM should document when other factors, such as fire, roads, wild horses, drought, or invasive species impact rangeland conditions. Changes to BLM management should address the cause of problems, not simply reduce livestock grazing. When grazing plays a role in problems, it is important to use appropriate management, not just reduce AUMs.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	52	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	43 C.F.R. § 4180.1(a) Fundamentals of rangeland health. Part 4180 should be removed from the Grazing Regulations. Current BLM Grazing Regulations 4180 improperly direct BLM to act on qualitative assessments, not quantitative data. Rangeland health determinations should be based on quantitative data and not focused solely on livestock grazing. Changes in grazing status 43 CFR 4110.3 should be changed to reflect the above: "The authorized officer shall periodically review the level of active use specified in a grazing permit/lease and may make changes to the terms and conditions as needed to accomplish allotment objectives. The AO shall first determine if livestock grazing is the causal factor for not achieving allotment objectives based on long-term rangeland monitoring trends. If the current livestock grazing program is determined to be the causal factor, the AO shall first implement changes in the management program to include, but not be limited to, changes in seasons of use, duration and timing of use, or rangeland improvements to accomplish a trend towards achieving allotment objectives before reducing active AUM's. Any reductions in active use will be placed in suspension."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	31	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	43 C.F.R. § 4180.1(a) Fundamentals of rangeland health. Part 4180 should be removed from the Grazing Regulations. Current BLM Grazing Regulations 4180 improperly direct BLM to act on qualitative assessments, not quantitative data. Rangeland health determinations should be based on quantitative data and not focused solely on livestock grazing. Changes in grazing status 43 CFR 4110.3 should be changed to reflect the above: "The authorized officer shall periodically review the level of active use specified in a grazing permit/lease and may make changes to the terms and conditions as needed to accomplish allotment objectives. The AO shall first determine if livestock grazing is the causal factor for not achieving allotment objectives based on long-term rangeland monitoring trends. If the current livestock grazing program is determined to be the causal factor, the AO shall first implement changes in the management program to include, but not be limited to, changes in seasons of use, duration and timing of use, or rangeland improvements to accomplish a trend towards achieving allotment objectives before reducing active AUM's. Any reductions in active use will be placed in suspension." We support an Instruction Memo to all field offices to assess if rangeland management tools other than reductions in active AUMs will accomplish allotment objectives. BLM should document when other factors, such as fire, roads, wild horses, drought, or invasive species impact rangeland conditions. Changes to BLM management should address the cause of problems, not simply reduce livestock grazing. When grazing plays a role in problems, it is important to use appropriate management, not just reduce AUMs. Grazing Permit Renewals. The grazing permit renewal process has become unworkable. The process is too expensive, slow, and complicated. Grazing permits should be considered as continuation of an ongoing process. Unless changes are being made to the permit, they should be renewed as a categorical exclusion. Regulatory language regarding range improvements should be changed to: "§ 4120.3-1(f) Conditions for range improvements. (f) Proposed range improvement projects shall be reviewed in accordance with the requirements of the National Environmental Policy Act of 1969 (42 U.S.C. 4371 et seq.). The decision document following the environmental analysis shall be considered the proposed decision under subpart 4160 of this part. Range improvement projects consistent with an allotment management plan shall be documented under the National Environmental Policy Act of 1969 with a categorical exclusion." We support targeted grazing as a fine fuel management tool. The regulations will better facilitate use of this tool by incorporating the following changes: * The issuance of targeted grazing permits should be issued under programmatic NEPA (including this EIS) and site-specific applications categorically excluded

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	20	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	43 C.F.R. § 4180.1(a) Fundamentals of rangeland health. Part 4180 should be removed from the Grazing Regulations. Current BLM Grazing Regulations 4180 improperly direct BLM to act on qualitative assessments, not quantitative data. Rangeland health determinations should be based on quantitative data and not focused solely on livestock grazing. Changes in grazing status 43 CFR 4110.3 should be changed to reflect the above: OLD TEXT: "The authorized officer shall periodically review the level of active use specified in a grazing permit/lease and may make changes to the terms and conditions as needed to accomplish allotment objectives. The AO shall first determine if livestock grazing is the causal factor for not achieving allotment objectives based on long-term rangeland monitoring trends. If the current livestock grazing program is determined to be the causal factor, the AO shall first implement changes in the management program to include, but not be limited to, changes in seasons of use, duration and timing of use, or rangeland improvements to accomplish a trend towards achieving allotment objectives before reducing active AUM's. Any reductions in active use will be placed in suspension." COMMENTER'S RECOMMENDED NEW TEXT: "The authorized officer shall periodically review the level of active use specified in a grazing permit/lease and may make changes to the terms and conditions as needed to accomplish allotment objectives. The AO shall first determine if livestock grazing is the causal factor for not achieving allotment objectives based on long-term rangeland monitoring trends. If the current livestock grazing program is determined to be the causal factor, the AO shall first implement changes in the management program to include changes in seasons of use, duration and timing of use, or rangeland improvements to accomplish a trend towards achieving allotment objectives before reducing active AUM's. Any reductions in active use will be placed in suspension."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	17	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	43 C.F.R. § 4180 Fundamentals of Rangeland Health BLM should consider moving this section out of the grazing regulations. This should be incorporated at the land use planning level, as it already is provided for in FLPMA and it should be applied to all land uses, not just grazing. We recommend that BLM no longer be required by regulation to conduct a "rangeland health determination" focused solely on livestock grazing. The information below further explains the current challenges with the application of this section and problems with "rangeland health determinations" based on 4180.2(c):
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Waite	Anita M.	Big Sandy NRDC	AZ	1437	8	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	4180 This whole section should not be a part of the regulations. Rangeland Health and Standards and Guidelines for grazing. Is meant to be a tool for the BLM in evaluating the range. Not for regulatory purposes.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miyamoto	Doug	Wyoming Department of Agriculture	WY	910	13	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration The fundamentals of Rangeland Health Standards are applicable to all permitted activttles on BLM lands, yet the regulations fall only under the livestock grazing section. We urge the BLM to consider moving the 43 CFR 4180 regulations to the planning regulations section to address all permitted activities. * We support the development and Implementation of standards and guidelines on a state by state basis. Given the change In environmental conditions, many of which are outside of the control of livestock grazing management, meeting the standards and guidelines may be well outside of the 10 year permit renewals tlmellnes and require significant Inputs to shift the resources In the desired direction. Examples of management practices might Include streambank restoration, reclamation from disturbed sites, 5011 erosion from large scale Wildfires, and more. Many of these actions require additional NEPA well beyond the grazing permit renewal process. In some cases, where livestock grazing Is determined as a Significant causal factor, range Improvement projects, such as stock water development, pipelines, or fences could be used to restore resource conditions. However, these all require additional analysis under NEPA and due to lack of funding. staff changes, or other reasons, many grazing permittees do not see these projects analyzed In a timely manner to assist In maintaining. restoring. or enhancing standards and guidelines. -We recommend BLM consider large programmatic NEPA decisions for range Improvement projects across field offices to tier site specific decisions to streamline NEPA and to address allotments not meeting rangeland health standards and guidelines. We believe grazing Improvement Infrastructure should belong to the permittees. Due to not holding title, loans for the Infrastructure are often times difficult to obtain. -By evaluating rangeland health standards across large watersheds or landscapes can provide additional mechanisms for BLM to Improve efficiencies. Allotments negatively contributing to not meeting the standards and guidelines could Implement site specific management changes to address resource conditions. -When an office develops a rangeland health assessment, the ability for the field office to Implement appropriate actions by the start of the next grazing year, according to 418O.2(c)(2) Is not appropriate. We recommend revising the standards determination language to Issue the determination simultaneously with the Decision Record for the grazing permit renewal. Further under 418O.(12)(f) the regulations are outdated regarding the lack of established state or regional standards and guidelines. We are unaware of any state where standards and guidelines have not been developed and Implemented. We recommend removing this language to reduce redundancy. -Rangelands across the
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Oros	Manuel		NV	1388	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	2. Allow an outside source to do assessments and evaluations on Land Health and Environmental conditions of our range land allotments. 3. The BLM contracting outside help for assessments and evaluations of range land to help permit holders to apply for TNR.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Oxarango	Rochelle		ID	889	4	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	* 4180 - Fundamentals of Rangeland Health BLM should consider moving this section out of the grazing regulations. This should be incorporated at the land use planning level, as it already is provided for in FLPMA and it should be applied to all land uses, not just grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rodriguez	Dan	Mohave County Farm and Livestock Bureau	AZ	1489	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	"Rangeland Health. Standards and Guides" Should not be a part of the regulations. Rangeland Health and Standards and Guidelines for grazing, was developed to be a tool to assist the BLM in evaluating the range. Not for regulatory purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kershner	Bryce		OR	1042	5	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	"Meeting Land Health Standards": For BLM Grazing Regs, this phrase is defined as the Authorized Officer has determined from quantitative monitoring that the Federal lands being grazed by the applicant for renewal of a grazing permit/lease to assess if a positive or stable trend is there to accomplish the allotment objectives in the Land Use Plan or AMP. Permit renewals meeting this shall be issued under a categorical exclusion under the NEPA as authorized under Section 3023 of Public Law 113-291 "An AMP or functional equivalent is an activity plan developed by another agency or permittee that describes grazing management and is approved by the authorized officer, or a plan developed by the BLM for other activities that also includes grazing prescriptions."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	14	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	The BLM should work with the USDA National Resources Conservation Service (NRCS) to use the Rangeland Analysis Platform (https://rangelands.app/) to monitor rangeland health indicators
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329	1	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	As a preliminary general comment I would like to state that collection of consistent, defensibly, and quantitative monitoring by qualified individuals could be a positive step in making good decisions and developing trust. Currently monitoring is haphazard and uses qualitative or subjective methodology, often only when NEPA is required.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mayer	Christopher		NV	823	7	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Animal Health and Production Adaptive use must also consider the many factors associated with annual stocking levels and herd size. The livestock market influences the base herd for the operation such as variability in cattle prices. Factors that contribute to establishing herd size and variability in herd size also include cost of feed and hay. Feedlot depending upon health conditions and weight gains based on market demand may require shipping to feedlots. Therefor turnout or removal times from public land may be variable for any given year. Breeding times also effects trailing or shipping of sheep and cattle. Lambing and calving times are variable and can be influenced by weather conditions resulting in variability of trailing or trucking shipping times. The dates are also variable because not all the numbers of livestock are moved at one time. On and off dates are also affected by the fluctuation in market prices and other circumstances that effect buying and selling of stock.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Federspiel	Mathieu		OR	751		4 Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Regarding Station 4, Promoting Land Health: Rangeland health has diminished over the decades due to overgrazing and poor management. While the BLM may have tried to maintain health, other forces, mainly ranching interests, pressured or ignored BLM authority. True rangeland health requires limited grazing with proper movement of cattle across the landscape, adequate reserves left for native species, control of alien invasive plants, allowing periodic fires, protection of riparian areas from cattle, and more. Consideration for multiple use of the landscape by diverse interests must also be considered. The declining market for rangeland beef should allow for retirement of grazing allotments. Charging grazing fees that are closer to the private market rate should be done to provide the revenue necessary for proper management of the land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cowan	Caren	New Mexico Stockman Magazine		1364		3 Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	OLD TEXT 4180.1 Fundamentals of rangeland health. 4180.2 Standards and guidelines for grazing administration. NEW TEXT DELETED OLD TEXT.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ashcroft	Nick			1357	63	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	BLM PART [43 CFR 9905, Feb. 22, 1995] § 1100.2 standards and guidelines for grazing administration. (a) The Bureau of Land Management State Director, in consultation with the affected resource advisory councils where they exist, will identify the geographical area for which standards and guidelines are developed. Standards and guidelines will be developed for an entire state, or an area encompassing portions of more than 1 state, unless the Bureau of Land Management State Director, in consultation with the resource advisory councils, determines that the characteristics of an area are unique, and the rangelands within the area could not be adequately protected using standards and guidelines developed on a broader geographical scale. (b) The Bureau of Land Management State Director, in consultation with affected Bureau of Land Management resource advisory councils, shall develop and amend State or regional standards and guidelines. The Bureau of Land Management State Director will also coordinate with Indian tribes, other State and Federal land management agencies responsible for the management of lands and resources within the region or area under consideration, and the public in the development of State or regional standards and guidelines. Standards and guidelines developed by the Bureau of Land Management State Director must provide for conformance with the fundamentals of § 4180.1. State or regional standards or guidelines developed by the Bureau of Land Management State Director may not be implemented prior to their approval by the Secretary. Standards and guidelines made effective under paragraph (f) of this section may be modified by the Bureau of Land Management State Director, with approval of the Secretary, to address local ecosystems and management practices. (c) The authorized officer shall take appropriate action as soon as practicable but not later than the start of the next grazing year upon determining that existing grazing management practices or levels of grazing use on public lands are significant factors in failing to achieve the standards and conform with the guidelines that are made effective under this section. Appropriate action means implementing actions pursuant to subparts 4110, 4120, 4130, and 4160 of this part that will result in significant progress toward fulfillment of the standards and significant progress toward conformance with the guidelines. Practices and activities subject to standards and guidelines include the development of grazing-related portions of activity plans, establishment of terms and conditions of permits, leases and other grazing authorizations, and range improvement activities such as vegetation manipulation, fence construction and development of water. (d) At a minimum, State or regional standards developed under paragraphs (a) and (b) of this section must address the following: (1) Watershed function; (2) Nutrient cycling and energy flow; (3) Water
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	16	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Making grazing decisions solely using range staff to design monitoring methods, conduct field data collection, and conduct assessments is a conflict of interest that makes BLM's range program legally vulnerable.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ruyle	George	University of Arizona	AZ	913	2	Subpart 4180 - Fundamentals of Rangeland Health and Standards and Guidelines for Grazing Administration	Incorporate the disclaimers listed in the Tech Ref 1734-6 regarding the intended uses of rangeland health assessment. It should not be used to: “• Identify the cause(s) of resource problems. • Independently make grazing and other management changes. • Monitor land or determine trend. • Independently generate national or regional assessments of rangeland health.” (BLM.2005. Interpreting Indicators of rangeland health. Technical Reference 1734-6 version 4.)Eliminate the statements that administrative action must be taken before start of next grazing season if “standards” are not met and current livestock grazing is the cause. f Substitute a statement like this: “Upon determining that rangeland health is not achieving the desired characteristics, or making progress toward that goal, and that any current land use is responsible, the authorized officer should develop a management plan to correct the situation as soon as is practicable given the nature of the problems and resources available.”
Subpart 4190 - Effect of Wildfire Management Decisions								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Green	Bill	Catron County, MT		1329	25	Subpart 4190 - Effect of Wildfire Management Decisions	Notwithstanding the provisions of 43 CFR 4.21(a)(1), when BLM determines that vegetation, soil, or other resources on the public lands are at substantial risk of wildfire due to drought, fuels buildup, or other reasons, or at immediate risk of erosion or other damage due to wildfire, BLM may make a rangeland wildfire management decision effective immediately or on a date established in the decision. Wildfire management includes but is not limited to: (1) Fuel reduction or fuel treatment such as prescribed burns and mechanical, chemical, and biological thinning methods (with or without removal of thinned materials); and (2) Projects to stabilize and rehabilitate lands affected by wildfire. (b) The Interior Board of Land Appeals will issue a decision on the merits of an appeal of a wildfire management decision under paragraph (a) of this section within the time limits prescribed in 43 CFR 4.416.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gunn	Danielle		ID	903	1	Subpart 4190 - Effect of Wildfire Management Decisions	fire can be managed with better livestock distribution through water developments and fencing. Range fires are devastating the West and need to be prevented whenever possible. One main method of fire prevention is to utilize livestock grazing and noxious weed management programs to reduce fuel loads and encourage healthy native plant growth. We can improve on grazing practices and weed management
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Sandra	Montana Grass Conservation Commission	MT	1386	3	Subpart 4190 - Effect of Wildfire Management Decisions	Allow prescribed fire to become a more widely used management practice. Prescribed fire reduces fine fuel loads and reduces probability of a catastrophic wildfire. Reducing expenses and increasing forage capacity both for domestic livestock and wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Sabrina		NV	798	2	Subpart 4190 - Effect of Wildfire Management Decisions	Targeted grazing for fuel reduction: Finally! This is what we’ve been saying all along. WE CAN HELP! The possibilities are endless of what our results could be. Better control over wildland fires, improving rangelands as a whole, and conserving wildlife and their habitat. It can all be attained by the INCLUSION and UTILIZATION of grazing animals. Fuel loads is a time sensitive element that must be addresses as so. Range managers and land users alike know when we are going to have an abundance of fuel in advance enough that we can “dispatch” animals to prone areas well in advance. Again, technology can be the missing key to its success and utilization.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tomera	Thomas		NV	797	3	Subpart 4190 - Effect of Wildfire Management Decisions	Shorten suspended grazing period to eliminate large fuel load. Again, a suspended grazing period may only need to be a few weeks or months, not years. It depends entirely on the precipitation, fires, and actual health of the allotment, not what a calendar says. Building of fire exclosure fences so grazing isn't affected by terrain and cut off water sources. Every fire we have encountered and agreed to fencing the burned area has cause problems for the cattle. Steep hills to traverse and water sources being cut out completely. Common sense about livestock behavior and what will benefit both the land and the cattle could help alleviate any problems with this point.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tomera	Thomas		NV	797	4	Subpart 4190 - Effect of Wildfire Management Decisions	Remove fire fences after one year of rest and after seed drop the second year. Let cattle graze the area. Providing hoof aeration, manure fertilizer and seed dispersal to help rebuild the soil. Soil health and its requirements are essential to the successful reestablishment of native grasses. Stagnation from non-use only invites the return of wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tomera	Thomas		NV	797	5	Subpart 4190 - Effect of Wildfire Management Decisions	Graze burned areas early the first year after green up to help slow the spread of weeds and cheat grass, then rest the area later part of the year so native grass can establish. Quickly grazing cheat grass in its early stages of growth have been shown to provide enough of an opportunity for the later growing grasses that are native to the area to get a chance to grow. Cheat grass out competes, so we should utilize early season grazing to level the playing field!
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tomera	Thomas		NV	797	2	Subpart 4190 - Effect of Wildfire Management Decisions	Fuel loads: managed by longer periods of grazing in heavy loaded areas. In allotments where heavy fuel load is apparent and is considered a very high fire risk, longer periods of grazing maybe needed to bring that load down. It really depends on how quickly the cattle can get to the area, how fast they can utilize the feed, not what the calendar says.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Selman	Laura	HaroldSelman Inc	UT	800	2	Subpart 4190 - Effect of Wildfire Management Decisions	Fire: During wet Springs the fuel load from invasive annual grasses increases. On years such as this, producers should be encouraged to stay past their normal off date to try and reduce fuel loads or the event of a wildfire. As the landscape changes or has changed, due to more frequent and hotter fires, grazing strategies need to change with them. As an example; Many ranges have traditionally been grazed with sheep, but now. Are better suited for cattle. Producers need the freedom to convert some of these ranges to cattle or back to sheep as the need arises. This could also mean the need for more water development and/or fences. While always keeping in mind a wildlife component in the projects to enhance species such as Sage Grouse, Sharp-tailed Grouse and Mule Deer. Regulations need to be considered after a fire. If an area is not seeded or has invasive annual grass, grazing should begin as soon as possible to suppress the weeds. Perhaps areas with invasive weeds should be grazed in the fall after they burn to give planted species as much advantage as possible against invasive weeds. These decisions should be decided on a site-specific level.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	16	Subpart 4190 - Effect of Wildfire Management Decisions	Expand the use of grazing to reduce fuels on landscape scale. Current grazing at 20% utilization led to significant fuels buildup and fire damage. Grazing for fire reduction should be a BLM priority and should trump other standards and guides. Increase use of Targeted Grazing and decrease the difficulty of authorizing it. Targeted Grazing authorizations can facilitate site specific treating vegetation composition and structure to create fuel breaks or other vegetation management objectives. Take the opportunity to increase the use of targeted grazing authorizations for vegetation management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doverspike	Mark		OR	994	7	Subpart 4190 - Effect of Wildfire Management Decisions	WILDFIRES should be quickly reseeded with a grass specie rather than let the land be overtaken with weeds that outcompete everything else. Even a non native grass specie is more desirable than medussa head of other kinds of weeds. When a half million acres burn, there isn't enough native seed available nor the money to purchase it. And rather than do nothing since there isn't enough seed and money, non native grass species would be preferable. 4190.1 ((x).Replacing fences immediately after a wildfire is also very important, not only for the proper handling of cattle using a permit, but also to control the horses from spreading out of their area. The horse overpopulation is an emotional issue, I realize. BUT, there shouldn't be a "kick the can down the road" attitude and management allowing the horse problem to spread to other areas they don't presently exist in, because there is no fence to hold them where they are now.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doverspike	Mark		OR	994	4	Subpart 4190 - Effect of Wildfire Management Decisions	JUNIPER control is also important for improving rangeland conditions. Juniper uses a lot of the water in our desert environments. That means the soil moisture profile goes to supporting the highest competitor for that moisture...juniper. Then the water can't flow to streams and they become intermittent or dry up completely. Juniper water use also means that waterholes can't fill. If a waterhole dries up then all cattle and wildlife congregate closer to the available water. Water supports life, and is should be for more life than a juniper! Juniper should be cut and piled and burned for better use of those control dollars. The big juniper should not be cut and left to lay. That just creates a very big fuel load for wildfire. I realize you need some flexibilty in your grazing regs 4190 (1) allows for both removal or non removal. But it would be more benficial to remove the big stuff. It takes forever to decay in our desert environment and just creates a huge fuel load for fire.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bradshaw	Charlie		WY	1379	10	Subpart 4190 - Effect of Wildfire Management Decisions	We request that the BLM not address base any domestic livestock reductions based on the 2006 EIS decision by Judge Winmill where he blamed cheatgrass infestations on domestic livestock. There are several research documents published by the Society for Range Management to dispel that decision by Judge Winmill. He based his decision on false information.
General Changes to Regulations								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	33	General Changes to Regulations	BLM should base grazing decisions that have economic and practical implications to permittees on quantitative data, not "best guesses" or anecdotal observations. BLM should base actions on replicable, high-quality scientific data and include cooperatively collected quantitative data.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	32	General Changes to Regulations	BLM should base grazing decisions that have economic and practical implications to permittees on quantitative data, not "best guesses" or anecdotal observations. BLM should base actions on replicable, high-quality scientific data and include cooperatively collected quantitative data.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jauhola	Christine		CO	1254	3	General Changes to Regulations	Utilizing livestock grazing to reduce wildfire risk is an unproven concept promoted primarily by the livestock industry. While goats have been used successfully in urban areas to reduce flammable brush and weeds, I am not aware of any goat allotments on public land. Cheat grass is an early season, ephemeral source of forage. It may emerge and cure in a matter of one to two weeks, frequently before perennial grasses are suitable for grazing. If allotments are stocked based upon cheat grass control, what happens to the perennial forage after the cheat grass cures? If livestock are allowed to remain on these allotments before range readiness of the perennial grasses, it will lead to long-term negative impacts to the health of these grasses and the long-term health of the range. This is a prescription for over-stocking based upon very ephemeral forage with the potential for more negative than positive benefits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	30	General Changes to Regulations	The BLM should evaluate what it has learned thus far from the Outcome Based Grazing program and incorporate any findings that would increase administrative efficiency into its grazing regulation revisions. · The comments above regarding targeted grazing and unauthorized use provisions should increase administrative efficiency.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	25	General Changes to Regulations	Targeted Grazing, allow use of targeted grazing for vegetation management. o The BLM grazing regulations should be revised to establish how and when targeted grazing can be authorized to provide for specific vegetation treatments to meet vegetation management objectives, including objectives to provide for fuel breaks and fuel load reduction projects to reduce wildfire risks and promote opportunities to enhance wildfire suppression efforts should suppression be necessary.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	35	General Changes to Regulations	"In what ways can livestock grazing be used to reduce wildfire risk and improve rangeland health?"
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Katlyn	Nevada State Grazing Board N2	NV	1174	5	General Changes to Regulations	BLM Temporary Nonrenewable, or TNR, has been utilized for multiple years to temporarily adjust allotment grazing (i.e. AUMs, season of use, etc.) as an effective tool to address periods of excess forage production, exceptional precipitation years that encourage early growth and invasion of species such as cheatgrass which is recognized for the rapid spread of wildfires in the Great Basin and other regions. Renewing the full authorization for TNR without first requiring an EA would greatly reduce the risk of catastrophic wildfires and encourage economic stability in rural areas. If an environmental process is required beyond the in-office assessment, then the Board suggests that a Categorical Exemption (CE) would suffice in these instances.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Katlyn	Nevada State Grazing Board N2	NV	1174	7	General Changes to Regulations	The Board believes that flexibility in grazing management activities post-fire is a valuable and much needed tool that can be used to reduce cheatgrass densities, reduce future wildfire risk, and improve the establishment or recovery of desirable species. Currently, BLM policy places emphasis on a grazing deferral period for two years following a fire (BLM Handbook H-1742-1 pg. 36). The Board stresses that on a site-specific basis, grazing be allowed within the typical two-year deferral period. According to Foster et. al. (2015) grazing cheatgrass for two years can reduce the invasive plant's density by 64 percent using responsible grazing practices. Cheatgrass reduction allows for recovery of desirable species and ultimately stabilizes the site to allow for improved ecological function. Regulation stipulating site-specific flexibility post fire is of utmost importance to stabilize burned areas while proactively preventing future fires. The Board requests that any management decisions made after wildfire be based on the site itself, since it is impossible to effectively manage an individual area under the current regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Micah	12 Ranch	OR	1249	3	General Changes to Regulations	Dormant season grazing, targeted grazing and changing season of issue are all tools we can use to improve soil health and increase available forage for livestock and wildlife. Specific, detailed grazing plans could be a help in this area.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Katlyn	Nevada State Grazing Board N2	NV	1174	12	General Changes to Regulations	The BLM's Outcome Based Grazing (OBG) initiative, effective in 2017, includes multiple accepted practices that are required to achieve multiple resource objectives on Nevada's public lands. Previous initiatives, like the Experimental Stewardship Program (ESP), have been put into effect over the years but have not been monitored to determine their success or overall effects. The Board feels that it is essential for the BLM to move quickly in regard to the OBG and extend this opportunity to more operators in an effort to achieve West-wide programmatic success. The Board also recognizes that the BLM is fully aware of permittees who would be beneficial participants in this initiative. As a result, the Board strongly believes that issues such as invasive species, wildfires, and everincreasing wild horse populations would benefit from the acceleration and expansion of the program to include said permittees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jauhola	Christine		CO	1254	2	General Changes to Regulations	While individual pilot projects may be successful since field offices can devote sufficient staff time to ensure success, implementing this concept on a large scale would require many more staff hours to monitor outcomes than most field offices could support. For allotments that are not currently meeting land health standards, how will outcome-based grazing improve the results? I see no incentive for permittees that are not currently meeting standards to implement the necessary changes to their grazing practices that will ensure land health improvement. The likely outcome, if this is implemented on a wide scale, is deterioration of range conditions and negative impacts to riparian areas, water quality, and habitat for wildlife and special status species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Oxarango	Rochelle		ID	889	2	General Changes to Regulations	* 4130.6-2 - Temporary Non-Renewable Permits BLM does not currently have a sufficient mechanism in place to enable the agency to act in a timely manner to manage high fuel loads. In most cases where this condition occurs, BLM is unable to gather date, write NEPA, and issue a decision before the end of the season to make use of the available forage. Particularly in areas with repeated fire history, BLM needs the flexibility to adaptively manage the fuel loads through grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yoder	Paul		NM	755	10	General Changes to Regulations	The arid West is a SYSTEM... IT IS A COMMUNITY... IT WORKED AS IS... UNTIL BIG RANCHING. Its profits depend on low cost exploitation of our American common wealth: the rangeland, its water, and its grasses. If Big Ranching introduced cattle into suburban grasslands, like your own front yard, there would be an enormous public outcry as they chomped your lawn and guzzled the water in your bird bath. ACTION: fund more law enforcement rangers and patrols ACTION: subsidize and continue re-introductions and sustained efforts to support native animal populations ACTION: make public land management decisions public and verifiable by online public voting. This verification is similar to the identity requirements of this and other BLM online comments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cargill	Emilia	GEYSER CATTLE COMPANY LLC	NV	1255	6	General Changes to Regulations	Temporary Non-Renewable use permits should be reinstated and one of the tools available to the BLM and its range conservationists. This type of permit is one aspect of adaptive management, and the new regulations should re-introduce this tool for Permittees' use, and it should be made available by a local BLM office on an expedited basis, perhaps under a "Categorical Exclusion", or if generally described in a Programmatic EA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mihal	Dianne	Stone Cabin Ranch, LLC		1326	1	General Changes to Regulations	One alternative to controlled burns that may get out of control quickly with the current level of decadence and litter, would be to have dynamic grazing permits that allow agencies to introduce cattle grazing post fire, early in the growing seasons to reduce undesirable grass (cheatgrass) fuel areas. Many studies currently exist that controlled grazing in these areas reduces increased re-current fire risks and can promote perennial, desirable grass growth.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ohs	Brian	Montana Stockgrowers Association		1163	2	General Changes to Regulations	Improving permitting efficiency. This could include, for example, changing how the BLM issues decisions for crossing permits, temporary nonrenewable permits, and authorizing grazing to reduce wildfire risk,. expanded or clarified use of NEPA categorical exclusion authorities, and streamlining protest and appeal processes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	1	General Changes to Regulations	Determine the productivity of the lands in terms of forage, wildlife diversity and numbers, water, and other biological components of rangelands and, as part of the decision process for each management unit (grazing allotment) make a determination if there is impairment of productivity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Echevarria	Marty		NV	838	3	General Changes to Regulations	Allow for a sensible and practical Temporary Non-Renewable (TNR) type permit process to be used for targeted grazing of hazardous fuel loads. Prioritize this permit process and make it easy and quick to access.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Orchard	Charley		WY	1074	1	General Changes to Regulations	Common sense needs to return to the BLM in many ways, but certainly regarding the permit renewal process and/or the TNR (temporary non-renewable) permitting. The BLM’s own data illustrates the burdensome amount of processing & NEPA work (5-7 years’ time) required to renew a 10 yr permit. By streamlining the permit process and improving flexibility, the BLM can be more responsive to both livestock and resource management needs. It also seems logical the Bureau consider changing permit renewals from 10-20 years. Yes, simplify billing by developing different billing schedules for different AUM authorizations. The BLM should take advantage of existing coordination requirements to reduce decision issuance time especially those which are simply a name transfer or are categorically excluded from NEPA process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cerri	Ronald		NV	1060	4	General Changes to Regulations	We also feel that permittees should be offered the option of utilizing Temporary Non-Renewable (TNR) permit use when situations warrant. Measures should specifically be included allowing for targeted cheatgrass grazing or other fine fuels control through TNR. This process must be streamlined and workable as to utilize existing forage in a responsible way, to accomplish the intent of TNR without bureaucratic hurdles and NEPA roadblocks.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	2	General Changes to Regulations	TNC believes that critical efficiencies in permitting, including the use of temporary non-renewable permits are needed, but that these can best be achieved at the regional or local level and should not circumvent NEPA. Further, we believe changes to the 4100 rules are an inappropriate way to achieve permitting efficiencies.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Laurie		NM	1374	11	General Changes to Regulations	The desired revisions to crossing permits, and non-renewable grazing permits, will result in further abuse by livestock operators. Expediting the ability for livestock to cross virgin land, or graze in a previously protected area because the forage is temporarily available, without an environmental analysis, is totally irresponsible and benefits only livestock operators while having the potential to impact land owned by millions of Americans. This short-term thinking, and the absence of a longer-term perspective, already exists within the livestock industry and does not need to be accelerated. Cattle can spread invasive plant species (cheatgrass) and do extensive damage to the land and riparian areas in a short time; therefore, the permitting process needs to remain unchanged. This is especially concerning because along with livestock grazing comes costly, destructive infrastructure and Wildlife Services. Cattle are still grazing long after the permitted season of use WITH current regulations. Because these allotments are rarely visited the violators are already in a position where they can make their own decisions regarding such use and are abusing it. Once again, by revising these regulations the BLM is simply legitimizing these activities and relieving themselves of accountability

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	Tony		ID	1087	1	General Changes to Regulations	Temporary Nonrenewable (TNR) We advocate for temporary nonrenewable (TNR) to be established as a viable tool in the toolbox for BLM to use. TNR has recently been referred to as “targeted grazing” and in our area, Owyhee Field Office, a pilot project established after the 2015 Soda Fire, has proven this to be an effective and necessary tool for removing fine fuel loads, especially in areas where invasive cheatgrass prevails. In addition, this should be a tool available to be used each year, as appropriate, when the forage is in excess and allow additional reduction to remove fuel loads and also maintain healthy plants. In addition, TNR must be able to be processed timely and efficiently and also: Not be counted as Animal Unit Months (AUMs) on any existing grazing right preference or permit Have flexibility with the administration and regulation – referred to in you BLM Memo 2018-109 – in order to achieve the desired outcomes agreed upon Under 4160 Title 43, BLM may authorize nonrenewable grazing permits in full force and effect Issuing these permits should be done under a categorical exclusion from NEPA
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Crowder	Jessica	Western Landowners Alliance	WY	1082	4	General Changes to Regulations	Permittees and lessees should be able to apply for and receive timely temporary nonrenewable permits and leases when needed to address unexpected weather or resource concerns, such as drought, snowpack or wildfire. For example, in order to address high snowpack and range readiness on a US Forest Service allotment in Wyoming, the BLM worked with permittees and partners to analyze and process a decision to allow extended use on lower elevation BLM-administered lands. This temporary nonrenewable permit was intended to address livestock operator needs, rest private pastures and hay grounds and meet resource needs on US Forest Service lands. In this situation, all parties recognized the importance of considering management and resource needs across land ownership boundaries. While the analysis and proposed decision were completed in a timely manner, the subsequent protest and appeal period hindered the implementation of this plan in the timeframe necessary to achieve resource goals. Livestock producers and public land managers should have the flexibility to temporarily reduce, remove or change the timing of livestock grazing in order to adjust to unusual or extreme weather events that alter the timing or amount of available forage. The BLM should consider whether it is appropriate to immediately issue temporary nonrenewable permits/leases when there is no likely resource damage or excessive livestock use expected. The proposed revision of regulations and corresponding EIS should consider how to better utilize this tool for the benefit of livestock operators and land health.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Hank	Nevada State Grazing Board N2 District	NV	1471	4	General Changes to Regulations	BLM Temporary Nonrenewable, or TNR, has been utilized for multiple years to temporarily adjust allotment grazing (i.e. AUMs, season of use, etc.) as an effective tool to address periods of excess forage production, exceptional precipitation years that encourage early growth and invasion of species such as cheatgrass which is recognized for the rapid spread of wildfires in the Great Basin and other regions. Renewing the full author izat ion for TNR without first requiring an EA would greatly reduce the ris k of catastrophic wildfires and encourage economic stability in rural areas. If an environmental process is required beyond the in-office assessment, then the Board suggests that a Categorical Exemption (CE) would suffice in these instances.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Hank	Nevada State Grazing Board N2 District	NV	1471		General Changes to Regulations 6	Additionally, the BLM released Technical Reference 1734-6 , Interpreting Indicators of Rangeland Health. Now in its fourth version (Pellant , et al. 2005), this agency handbook has constantly warned that the qualitative methods included were not to: * Act as stand-alone methods to make grazing and other management changes; * Solely identify the cause or causes of resource problems; or, * Monitor land or determine any trends. Due to the qualitative nature of this approach, the N-2 Board strongly feels that this field assessment method is subjective and contentious for all parties involved. As such, the Board suggests that these methods not be used to guide any potential grazing management changes or evaluate any current practices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Ade	Kane County Commissioners	UT	1141		General Changes to Regulations 3	Similarly, Temporary Non-Renewable (TNR) Animal Unit Months (AUMs) should be readily available as a tool to managers when favorable precipitation events occur, when successful fire rehabilitation happens, or when range improvement projects take place. If needed, a programmatic Environmental Impact Statement (EIS) for all of the BLM should be conducted to make TNR AUM's available for managers to use. Just as AUM's can be cut for resource protection, AUM's should also be able to just as easily increase when conditions and resources warrant it.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry and Diane		MT	960		General Changes to Regulations 1	We like the concept of the Outcome Based Grazing initiative allowing more grazing management flexibility as conditions allow. With many allotments a mixture of BLM/private, we would encourage a better relationship between permittees and BLM personnel in order to monitor conditions and management needs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834		General Changes to Regulations 15	Another issue related to current data collection and decision-making methods is the use of a Rangeland Health Assessment (RHA) to make long-term decisions on grazing allotments. An RHA is a point in time assessment that does not take into account previous years of management, precipitation and disturbance. Many times, the RHA is the only relevant, up-to-date "monitoring" available on which to base decisions. Unfortunately, the misuse of RHAs creates flaws and potential long-term negative effects. Basing a long-term grazing permit on a short-term point in time assessment does not accurately depict what has been going on during the life of the current permit and should not warrant changes to a grazing permit. Again, the State of Idaho requests that the BLM address proper monitoring needed to make changes to grazing permits. By increasing flexibility and efficiency in the permit renewal process, BLM range staff should be able to adequately collect data to support grazing decisions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miltenberger	Sheena			1185		General Changes to Regulations	Additionally, it is our observation that an increased law enforcement presence on BLM grazing allotments is needed in areas within 60 miles of urban centers. Historically, every year, public use on these allotments has had a detrimental effect on paid grazing use of the allotments. These effects include, but are not limited to: unauthorized motor vehicle use (in areas closed to motor vehicles), illegal trash dumping, and outright theft of fences, gates and other improvements installed and paid for by permittees. Specific incidents of theft can be cited (and have been reported to BLM) and we are available to personally show BLM representatives the impacted areas should they like to see them for themselves. We pay to use the land for grazing whereas the public pays nothing to destroy it. As its name implies, the Bureau of Land Management should be managing the land and its recreational use by the public. This should include regular outreach to permittees and timely response to problems they experience. Destruction/theft of gates and fences is a particular problem because it allows livestock to roam freely across adjacent private lands and roads. Permittees cannot stop this; they simply do not have the resources or the legal empowerment. They are highly motivated to protect their livestock - which represents their livelihoods - but it is not feasible for them to conduct daily inspection of miles of fencing; nor should they be expected to. Permittees are at risk for losing valuable livestock and they are held responsible for damages caused to private property.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miltenberger	Sheena			1185		General Changes to Regulations	A stronger effort by BLM to improve enforcement activities in wildland/urban interface areas is called for. Our local BLM office and Range Conservationist have been great to work with. We recognize the difficulties imposed by budgetary and personnel constraints under which they are operating. We truly do appreciate their efforts. Our reality is that hundreds of feet of fenceline we paid for and built ourselves have been destroyed/stolen more than once. Currently we have little-to-no recourse or compensation for material stolen, livestock lost, or damages caused by livestock set loose by destroyed fencing. Our reputations as permittees, both legally and within the community, should not be damaged by illegal actions of others over whom we have no control. Our operation has experienced all of the issues cited above due to public use on our grazing allotment. Most of these issues could be reduced or eliminated with increased law enforcement patrols and strong prosecution for dumping, theft and destruction of property. Every year, at our own expense, we perform clean-up of dump sites and rebuild fences that have been stolen. This is a hardship and it is in addition to paying the annual grazing fee. Reciprocal help from the BLM with consistent oversight and enforcement, swift prosecution of offenders, and timely compensation for losses would be greatly appreciated. It is our desire to forge an effective and stronger alliance with BLM to address these issues and we sincerely thank you for taking the time to consider our comments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Withroder	Amanda	Wyoming Game and Fish Department	WY	1014		General Changes to Regulations	The Outcome Based Grazing Authorizations (OBGA) will be focused on evaluating end results using indicators that are determined through monitoring. From the presented information, the 11 pilot projects that the OBGA will be based on appear promising, but additional clarification on how this would work on a much larger scale is desired (e.g., will the OBGA be instituted for all permitted livestock operators across the BLM, or will only a few permits be managed under the proposed authorizations?). The Department's concern is that efficiencies may be gained in the permitting process, but workloads will significantly increase for monitoring and ensuring that rangeland health standards are maintained. Outcome based grazing and other "flexible" options should require many monitoring events when approaching utilization limit. We question whether the BLM has adequate capacity to conduct this monitoring and to enforce permit conditions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	DeSoto	Randi	Summit Lake Paiute Tribe	NV	883	11	General Changes to Regulations	While the Tribe supports efforts by the BLM to initiate and analyze both Outcome Based Grazing (OBG) and Targeted Grazing for Fuel Reduction (TGFR), we believe that efforts to include such programs as part of the proposed revision of grazing regulations are premature and not well articulated in the documents provided. For example, the "Outcome Based Grazing" and "Targeted Grazing for Fuel Reduction" documents only describe the basic concepts of OBG and TGFR, however, the documents do not outline any details as to how these projects would be implemented, when these projects would commence, or what tangible measurements would constitute project success or failure. While these projects have great potential, it appears that they have not generated enough data to inform implementation on a national level.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Raymond	Brian	Daggett County Commission		1142	7	General Changes to Regulations	The BLM's grazing regulations should be updated to better accommodate rotational grazing (also known as deferred grazing, rest-rotation grazing, and other terms). Rotational grazing significantly benefits rangeland health livestock, and has successfully been implemented on a large scale at several sites in Utah. Projects such as the Three Creeks Grazing Improvement Project in Utah's Rich County can be designed to enhance forage for livestock, improve wildlife habitat, and protect water quality. Rotational grazing is also an effective way to maintain existing levels of AUMs in situations where rangeland health deteriorates due to drought, over-use by wild ungulates, or other conditions. Unfortunately, existing BLM regulations are not conducive to implementing rotational grazing systems on BLM allotments, and the NEPA analysis for such projects can take many years. (The Three Creeks Project in Utah is one such example, which took over seven years to complete.) Out-of-date regulations have made rotational grazing projects a particular target of litigious organizations which oppose rotational grazing and seek to delay projects indefinitely. Updated BLM regulations should help BLM range personnel perform timely NEPA analysis for rotational grazing projects, as well as related administrative tasks such as consolidating grazing allotments. Rangeland health across BLM lands in the western United States will improve if the BLM facilitates rotational grazing and works cooperatively with interested permittees so make such systems a reality.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vincent	Randan		UT	923	2	General Changes to Regulations	The 10- year renewal often only restates the management strategies that have been effective the previous years. It also creates additional unnecessary paperwork for the BLM. We know that some of these renewals now require over 100 pages of documents to complete. A possible solution is to do away with the 10-year renewal requirement. Perhaps the 10-year process could be considered a review and not a renewal with regulations and policies that would allow the BLM and rancher more flexibility in the dates of use and the allowable AUMs. It is very difficult to predict when and how much forage will be available any given year or season. For this reason, it is often difficult to manage using rigid on off dates and AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mathews	Brian		OR	1072	1	General Changes to Regulations	Roaring Springs Ranch would like BLM to consider allowing greater flexibility in grazing management in general, including allowing grazing of a different number of head, grazing for a different length of time, and/or grazing during a different time of year, based on factors that would include weather/precipitation, amount of feed available, wildlife habitat, and wild horse concentration.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Agee		NV	1059	1	General Changes to Regulations	Permits should not be something that is set in stone. Nature is an ever evolving entity so anything dealing with it needs to be flexible to deal with its changes and our improved knowledge. Having a permit that is ridged takes away the ability to make changes that may be needed for improved land health. This applies to both timeing and stocking rate. A tool that could be used concerning stocking rate is TNR (temporary nonrenewable aums), but due to it having to go to public review and appeal it has been rendered useless. TNR should be taken out of the appeal process so that it can be a tool to use to adjust stocking rate, example may need more animals to graze to handle excess fuels to prevent a fire.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stanko	Joanne	Stanko Ranch	CO	1105	1	General Changes to Regulations	In the past, the grazing period and Aums have been set in December which is actually how much water and grass there would actually be. This ocured for a number of years. Due to the inflexibility of grazing period, our cattle were kept of the allotment which resulted in grass which was too tall and dry to be palatable for them. In addition, the number of cattle was serously reduced so they couldn't covdr the land as needed. This led to no reduction of fireload and the grass merely became thatch which resulted in degredation of the range. On our private land, we do an early grazing in the spring then come back in again in the late fall. This fits not only with the most recent rangemanagement for healythy range and soil but considered best practices in our area. The USDA has recently approved year around grazing on public lands for producers to be eligible for the Livestock Forage Program as it is in Wyoming also.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frank	Bobbie	Wyoming Association of Conservation Districts	WY	1222	2	General Changes to Regulations	BLM should consider providing greater flexibility regarding the process for decreasing permitted use. Should changing conditions warrant a review of the grazing permit, BLM must not automatically decrease AUMs but should first require modifications of management practices. If and when BLM ultimately determines active AUMs should be reduced, those AUMs should be converted to suspended use and not permanently reduced.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reukauf	Lon	Cherry Creek Ranch	MT	1117	2	General Changes to Regulations	As a land manager and permittee I am very much in favor of Rest Rotation grazing. I have 2 allotments of Interspersed ownership consisting of BLM, Private, State, and Railroad owned lands. With great personal effort, materials, and finances, we have split each of these 2 allotments into 6 pasture systems. I would like to use 5 of the 6 pastures each year and totally rest one, but use 100% of the total AUM's in the 5 used pastures. This means that each of the 5 used pastures would be grazed at 116% of the AUM's rated in each pasture, but the total AUM's for the allotment would not be exceeded. A different pasture would be rested each year and the season of use would be rotated through 6 years. This change of season of use and a full year of rest for one for six pastures allows different seasonal species of flora to recover better. The BLM officers are reluctant to do this because of paper work concerns. With more flexibility in grazing methods very productive methods such as this could be used and improvements in Land Health mad. We did not have good luck with our 3 Pasture Rest Rotations as the 2 used pastures received too long of grazing periods. 6 pastures with 5 being grazed worked much much better.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Singleton	Annette	Summit		1305	2	General Changes to Regulations	The BLM should consider providing livestock producers with greater flexibility regarding on-off dates on BLM grazing allotments. The ability for a livestock producer to enter a grazing allotment early if conditions allow, or to stay on the allotment beyond the "off date" if sufficient forage is available, would considerably enhance livestock grazing operations on BLM lands. When favorable weather conditions produce more forage than expected, livestock producers should be afforded the opportunity to benefit from these conditions. Flexible on and off dates during favorable years would mitigate the negative impacts suffered by livestock producers during drought years. Over time this flexibility to adapt to variable weather conditions would bring more stability to ranching operations and local economies. The BLM 's regulations should be revised so that the annual operating agreements of livestock producers include an option for flexible on-off dates as conditions allow. The BLM should empower its range personnel to make rapid, science-based decisions to authorize early on dates or late off dates, as conditions allow. The NEPA analysis for a BLM 10-year grazing permit should consider the environmental impact of early on dates and late off dates during favorable years, so that no additional NEPA analysis would be necessary to authorize such flexibility when favorable conditions occur. Similarly, Temporary Non-Renewable ("TNR") Animal Unit Months ("AUMS) should be readily available as a tool to managers when favorable precipitation events occur, when successful fire rehabilitation happens, or when range improvement projects take place. If needed, a programmatic Environmental Impact Statement ("EIS") for all of the BLM should be conducted to make TNR AUM's available for managers to use. Just as AUM's can be cut for resource protection, AUM's should also be able to just as easily increase when conditions and resources warrant it.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lally	Meghan	Salisbury Livestock Company		1119	4	General Changes to Regulations	Currently, in a bad winter, it is not allowed to feed livestock on the BLM. I agree that in a drought, livestock should not be fed on the BLM. However, on top of snow, where there is not any effect on the resource, the rule should be different. The policy for emergency use in weather events or bad winters should be more flexible. For many operations, it is impossible to take all of their livestock home, which may be in worse conditions than the BLM.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	Tony		ID	1088	6	General Changes to Regulations	Carrying Capacity Determinations Carrying capacities of allotments and pastures must be made on quantitative data, not willy nilly or in an arbitrary fashion. Authorized livestock use should also have flexibility and this carrying capacity and flexibility should be determined for the allotment from quantitative data.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallwood	Lori	Big Horn County Commissioners	WY	1223	4	General Changes to Regulations	BLM should consider providing greater flexibility regarding how it decreases permitted use. Rather than automatically decreasing animal unit months (AUMs) when range conditions do not allow for grazing, BLM should be given the flexibility to modify management practices, such as rotation, timing and duration.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rimmer	Karen		WY	1345	2	General Changes to Regulations	Additionally, BLM should consider providing greater flexibility regarding the process for decreasing permitted use. Should changing conditions warrant a review of the grazing permit, BLM must not automatically decrease AUMs but should first require modifications of management practices. If and when BLM ultimately determines active AUMs should be reduced, those AUMs should be converted to suspend use and not permanently reduced.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	15	General Changes to Regulations	The BLM has extensive authority to reduce livestock numbers or shorten the period of grazing use now. It was clear from the information BLM presented for this regulatory change was that the "flexibility" being promoted in this process proposes to increase grazing numbers above those permitted. Increasing grazing in excess of the carrying capacity numbers comes with proven habitat degradation and unproven benefits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	1	General Changes to Regulations	The BLM should to consider targeted grazing and outcome-based grazing as a management tool for wildfire fuel prevention and mitigation BLM managers and livestock operators can use outcome-based grazing to respond to changing, on-the-ground conditions, such as wildfires, high moisture years, or drought. Properly grazed landscapes result in landscapes that burn less intensely and recover quicker than ungrazed landscapes in instances of wildfire.1 Moreover, targeted grazing can reduce the wildfire length and rate of speed, and is generally more cost effective than other treatment methods.2 Proper livestock grazing improves rangeland health and reduces the damaging effects from wildfire.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	O'Toole	Sharon	Salisbury Livestock Co., Banjo Sheep Company, LLC	WY	1299	2	General Changes to Regulations	We requested a change which would involve a new rotational grazing system, greatly benefiting the plant and wildlife resources, as well as our livestock. We were told that implementing such a plan would take years, due to the backlog of paperwork and needed NEPA analysis. It is not a radical nor illogical change, but is sidelined due to the requirements needed to implement it. We ask that flexibility be allowed when impacts are minimal and outcomes are positive.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lanham	Miteshell	Lander County, NV	NV	1219	4	General Changes to Regulations	These regulations should include a streamlined and workable process for allocation and use of grazing forage, when it is available to be used in a responsible way, even if it falls outside of grazing permit dates, terms, and conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	20	General Changes to Regulations	The regulations should require, in coordination with ranchers, management decisions are based upon the best rangeland science, that flexibility is built into grazing permits to allow for adaptive management as issues and concerns arise, and that that quality and quantity of data collected can support all decisions made. The regulations should ensure that every feasible option is pursued before any restrictive actions is taken against grazing. Before imposing grazing restrictions or seeking changes in livestock stocking rates or seasons of permitted use, identify and implement all economically and technically feasible livestock distribution, forage production enhancement, weed control programs, prescribed grazing systems, off-site water development by the water rights holder, shrub and pinyon/juniper control, livestock salting/supplementing plans, and establishment of riparian pastures and herding. Assure that all grazing management actions and strategies fully consider impact on property rights of inholders and adjacent private land owners and consider the potential impacts of such actions on grazing animal health and productivity.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	19	General Changes to Regulations	The grazing regulations should include a streamlined and workable process for allocation and use of grazing forage, when it is available to be used in a responsible way, even if outside of grazing permit dates, terms, and conditions. This would be similar to the current Temporary Non- Renewable (TNR) permit process that has become unworkable and essentially unavailable, against the whole intent of TNR, due to bureaucratic hurdles. There should specifically be included measures to allow for targeted cheatgrass grazing or other fine fuels control, including excess native perennial vegetation or excess beneficial non-native perennial vegetation (e.g., crested wheatgrass or forage kochia) through TNR-type measures. We do note that a TNR-type process may not be necessary should true flexibility and adaptive management be built into authorizing grazing through the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	37	General Changes to Regulations	The BLM needs to update the current standards to better reflect the role of ecological processes and mechanisms across all successional phases (stages) of desired (as well as undesired) states so that the concepts of a "healthy landscape" are accurately applied. Early- and mid-successional landscapes (phases) need to be recognized as acceptable and appropriate outcomes of disturbance when they have the desired successional species and the ecological processes needed to progress to desired mid and late successional landscapes are in place. The size of the disturbance may be undesired, but is a separate issue.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Myrin	Nils		UT	1104	2	General Changes to Regulations	Please consider making grazing management decisions on a local site by site evaluation with input and discussion from producers and agency personnel. No consecutive years are alike and flexibility in on and off dates and pasture rotations result in better outcomes than a predetermined schedule.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sims	Scott		WY	734	1	General Changes to Regulations	It is critical to be flexible in management to take into account variable weather trends and plant behavior. Fast grazing moves with adequate rest/recovery time, and rotating season of use, using livestock as a management tool, is vitally important to sustain and improve soil health. Range land monitoring proves this works.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	8	General Changes to Regulations	Instances also exist when the permittee's off-date for a BLM allotment is five days before the on-date for their adjacent Forest Service allotment. The BLM should afford flexibility for on/off dates to address these issues. In Utah, at least two weeks, and preferably one month, of flexibility should be given outside of permitted dates to provide necessary site-specific discretion to manage landscapes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	32	General Changes to Regulations	If the ultimate goal is to prevent repeated fire and provide the opportunity for sagebrush and other non-sprouting shrubs to establish and increase, targeted grazing is a viable tool for these areas as well, and should be included in this assessment.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Oman	Milt			1138	1	General Changes to Regulations	I feel that there should be more flexibility and communication between the BLM and permittees on grazing dates forage available. I also feel that BLM needs to work on the amount of fuel left for fire more flexibility on fire fuel and length of time grazing is deferred.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Casey		NV	748	2	General Changes to Regulations	Grazing regulations should include a streamlined and workable process for allocation and use of grazing forage, when it is available to be used in a responsible way, even if outside of grazing permit dates, terms, and conditions. This would be similar to the current Temporary Non-Renewable (TNR) permit process that has become unworkable and essentially unavailable, against the whole intent of TNR, due to bureaucratic hurdles. There should specifically be included measures to allow for targeted cheatgrass grazing or other fine fuels control through TNR-type measures. It is crucial for the regulations to mandate reliance on current rangeland science - Ecological Site Descriptions (ESD) and their associated State and Transition Models/Disturbance Response Groups to inform objectives and differing levels of grazing allowed. An understanding and description of the ecological shifts or transitions that have occurred due to disturbance, such as wildfire, or legacy management are imperative in order to frame management objectives under any grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Vivian		NV	1134	5	General Changes to Regulations	Flexibility is a must! Ranchers need to have the flexibility to work with the range cons when climate, or other changes occur that may affect the grazing. Changes need to be possible on a local level, within a reasonable timeframe.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	18	General Changes to Regulations	BLM should reflect the change to the landscape rather than manage for an ecological state that would never exist on the landscape. BLM should have the flexibility to manage current conditions, and not desired conditions due to a catastrophic events that severely modify the landscape.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	27	General Changes to Regulations	BLM already has the authority to reduce at any time the number of livestock and the period which they graze. No more regulatory authority is needed for agency action in this area. However, the unstated reason behind the request for increased flexibility is to remove the limit on the amount of grazing and when it occurs. The argument that grazing earlier or in greater numbers than now permitted helps control wildfire and improves rangeland health is largely unsupported in fact rejected by independent objective science.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	1	General Changes to Regulations	A lack of permit or process flexibility limits our ability to reasonably adjustment management to match annual conditions. Because of year-to-year variability in weather, phenology, and unpredictable natural and human-caused disturbance, adaptive management of rangelands in the arid west requires greater management flexibility. TNC agrees that well-managed livestock grazing systems can promote healthy, diverse, and resilient landscapes for people, wildlife, and ecosystem services. ¹ But to be effective implementing additional flexibility, the BLM needs thoughtful, science-based planning and real-time adaptive management examples.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	13	General Changes to Regulations	* Grazing regulations should include a streamlined and workable process for allocation and use of grazing forage, when it is available to be used in a responsible way, even if outside of grazing permit dates, terms, and conditions. This would be similar to the current Temporary Non-Renewable (TNR) permit process that has become unworkable and essentially unavailable, against the whole intent of TNR, due to bureaucratic hurdles. There should specifica lly be included measures to allow for targeted cheatgrass grazing or other fine fuels control through TNR-type measures.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	19	General Changes to Regulations	We support targeted grazing as a fine fuel management tool. The regulations will better facilitate use of this tool by incorporating the following changes: · The issuance of targeted grazing permits should be issued under programmatic NEPA (including this EIS) and site-specific applications categorically excluded from NEPA analysis. · Targeted grazing authorizations should be separate from regular grazing authorizations. That is, the Animal Unit Months (AUM) authorized by such permits should not count as or reduce the number of AUMs permitted under existing grazing preference or term permit. · Targeted grazing authorizations should not conflict with existing grazing preference or term permits. · BLM Instruction Memorandum No. 2018-109 provides direction so that targeted grazing authorizations can be issued and administered with the appropriate flexibility necessary to achieve the desired management objectives. · 43 CFR 4160 provides BLM with authority to issue decisions authorizing nonrenewable grazing permits in full force and effect.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	22	General Changes to Regulations	We support targeted grazing as a fine fuel management tool. The regulations will better facilitate use of this tool by incorporating the following changes: -The issuance of targeted grazing permits should be issued under programmatic NEPA (including this EIS) and site-specific applications categorically excluded from NEPA analysis. -Targeted grazing authorizations should be separate from regular grazing authorizations. That is, the Animal Unit Months (AUM) authorized by such permits should not count as or reduce the number of AUMs permitted under existing grazing preference or term permit. -Targeted grazing authorizations should not conflict with existing grazing preference or term permits. -BLM Instruction Memorandum No. 2018-109 provides direction so that targeted grazing authorizations can be issued and administered with the appropriate flexibility necessary to achieve the desired management objectives. -43 CFR 4160 provides BLM with authority to issue decisions authorizing nonrenewable grazing permits in full force and effect.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	8	General Changes to Regulations	TNC supports adjusting the grazing regulations to improve flexibility and adaptive management in livestock grazing to help address seasonal variability so long as sufficient measures of accountability are also incorporated. TNC recognizes that western rangelands are landscapes that experience dramatic variability year-to-year and encompass incredible diversity across the range. Strict management guidelines are often insufficient to capture and address this variability and lead to failures in resource conservation and restoration.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kildew	Kim	Boulder Creek Ranch	ID	1483	1	General Changes to Regulations	This letter advocates more enhance local and user centered input, operation, and control of land management under the umberalla of the standards for general protection of the range land promulgated by the BLM. Also allowing for localize examination of grazing conditions each year should be the center peace to proper rangeland utilization, enhancement, and protection. Flexible turn out times, modification of seasonal use and AUM numbers could establish starting points fir a flexible template for operation of each allotment. Seasonal modifications due to changing conditions on the ground from yearly changes in amounts of snow, rain, or drought should be permitted under the umbrella of a total use formual tied to range health.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bottari	Paul		NV	1205	5	General Changes to Regulations	There should be more flexibility to change BLM allotment boundaries. If it is more beneficial for an allotment boundary to run differently or to remove some public lands from an allotment and make it it's own allotment then this should be able to happened by local District and with local input of the advisory councils without having to wait for a District Plan to be completed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	26	General Changes to Regulations	The use of September 30 as the date for when perennial plants stop growth us not grounded in reality, especially at the spatial scale of this effort. The important physiological stage for management is when the plant has produced viable seed. At that time, the plant has stored the maximum amount of energy in its buds and roots for their survival during the upcoming dormant season and initiation of growth the following year. This assumes the growing season utilization was roughly 50% or less. For perennial herbaceous species in Nevada, seed set typically occurs from early to mid-June at valley locations, and mid-June to mid-July at upper elevations. Even in moist and wet meadows, most plants have seeded out by early July to early August. For example, in mid-July of this year, while on field tours in the Santa Rosa Mountains, Letterman's needlegrass at 7,200 feet was filling seed and for Idaho fescue the seed was ripening. Three Poa species in meadows were at the seed ripening stage. Using a September 30th date does not match biological reality in most situations, and flexibility is the most important criteria for success of this project.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cozzens	Paul	Iron County Commission	UT	1492	6	General Changes to Regulations	Temporary Nonrenewable Grazing (TNR) -Grazing allowed due to forage circumstances or noxious weed control. Streamline and add flexibility. Streamline by putting into place full force on EA decisions for TNR grazing once the document is completed. In most cases, the implementation of the plan is held up due to required reviews by the state offices and by the time a decision of record is made, the temporary situation is passed. Flexibility by allowing the decision maker to be the BLM Field Office and range technicians without having to seek delayed approval from above. Fifteen (15) day shoulder season flexibility without TNR. Allow BLM Field Office the flexibility to change turn on/off dates because of forage conditions, noxious weed control, etc.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	19	General Changes to Regulations	Temporary Non-Renewable (TNR) Animal Unit Months (AUM) should be readily available as a tool for managers when favorable precipitation events occur and when successful fire rehabilitation or range improvement projects happen A programmatic EIS can be conducted to make TNR AUM's available for managers to use. Just as AUM's can be cut for resource protection, without an analysis, AUM's should increase when conditions and resources warrant it without going through lengthy andunnecessary analysis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	5	General Changes to Regulations	Targeted grazing should be used to reduce fuel loads. In years of abundant forage, efforts should be made by the agencies to analyze current wild land fire risks and then collaborate with permittees in the affected areas to use and manage the excess forage. Practices considered to do this could be temporary electric fencing, increased numbers, water haul sites and herding. Action to make available all tools needs to be considered. Ability to place fencing and water hauls must not be hampered. During the growing season decisions to manage excess forage must be done promptly. Under current conditions TNR does not effectively make it possible to achieve targeted grassing during years of abundant forage. TNR needs to change to a more reliable regulation giving district managers swift ability to make timely decisions. Managing fuels in the winter must be flexible to avoid inclement weather. Additional AUM'S (TNR) or new equivalent must be granted quickly to make the best management decisions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	2	General Changes to Regulations	Permits should allow flexibility and be managed through an outcome based plan. Permittees should be allowed to continue good practices and be granted more flexibility to meet range land objectives through an outcome based grazing system. If permittees are not meeting standards or making significant progress towards standards, due to current management practices, a plan should be made on an annual basis through collaborative monitoring to allow the livestock management to meet the proper standards and rangeland health objectives. Plans should not put undue hardship on permittees but should be organized to meet objectives through a collaborative, agreeable effort. Where standards are not being met, every effort to plan, coordinate and manage respective areas should be exhausted before any major restrictive regulations be placed upon the permit holder. A descriptive tool list should be considered through science based range management practices. Regulations should make it simple for the 001 to work on an even level and understanding basis to promote good relations and good management practices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	2	General Changes to Regulations	Outcome-based grazing has great potential to allow ranchers an opportunity to achieve rangeland health goals on public land, while allowing greater flexibility in livestock management decisions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kern	David			1196	1	General Changes to Regulations	More flexibility on season dates depending on the water and snowpack. Utilize the forage in helping control wildfires. Control of noxious weeds.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Robinson	John	Idaho Conservation League	ID	1341	3	General Changes to Regulations	In order to accommodate increased flexibility, the BLM and permittees need to improve baseline and real time monitoring, provide for increased accountability, establish soft and hard triggers for reevaluating and changing management, and have more frequent adaptive management reviews
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	1	General Changes to Regulations	The BLM should to consider targeted grazing and outcome-based grazing as a management tool for wildfire fuel prevention and mitigation BLM managers and livestock operators can use outcome-based grazing to respond to changing, on-the-ground conditions, such as wildfires, high moisture years, or drought. Properly grazed landscapes result in landscapes that burn less intensely and recover quicker than ungrazed landscapes in instances of wildfire.1 Moreover, targeted grazing can reduce the wildfire length and rate of speed, and is generally more cost effective than other treatment methods.2 Proper livestock grazing improves rangeland health and reduces the damaging effects from wildfire.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	O'Toole	Sharon	Salisbury Livestock Co., Banjo Sheep Company, LLC	WY	1299	2	General Changes to Regulations	We requested a change which would involve a new rotational grazing system, greatly benefiting the plant and wildlife resources, as well as our livestock. We were told that implementing such a plan would take years, due to the backlog of paperwork and needed NEPA analysis. It is not a radical nor illogical change, but is sidelined due to the requirements needed to implement it. We ask that flexibility be allowed when impacts are minimal and outcomes are positive.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lanham	Miteshell	Lander County, NV	NV	1219	4	General Changes to Regulations	These regulations should include a streamlined and workable process for allocation and use of grazing forage, when it is available to be used in a responsible way, even if it falls outside of grazing permit dates, terms, and conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	20	General Changes to Regulations	The regulations should require, in coordination with ranchers, management decisions are based upon the best rangeland science, that flexibility is built into grazing permits to allow for adaptive management as issues and concerns arise, and that that quality and quantity of data collected can support all decisions made. The regulations should ensure that every feasible option is pursued before any restrictive actions is taken against grazing. Before imposing grazing restrictions or seeking changes in livestock stocking rates or seasons of permitted use, identify and implement all economically and technically feasible livestock distribution, forage production enhancement, weed control programs, prescribed grazing systems, off-site water development by the water rights holder, shrub and pinyon/juniper control, livestock salting/supplementing plans, and establishment of riparian pastures and herding. Assure that all grazing management actions and strategies fully consider impact on property rights of inholders and adjacent private land owners and consider the potential impacts of such actions on grazing animal health and productivity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	19	General Changes to Regulations	The grazing regulations should include a streamlined and workable process for allocation and use of grazing forage, when it is available to be used in a responsible way, even if outside of grazing permit dates, terms, and conditions. This would be similar to the current Temporary Non- Renewable (TNR) permit process that has become unworkable and essentially unavailable, against the whole intent of TNR, due to bureaucratic hurdles. There should specifically be included measures to allow for targeted cheatgrass grazing or other fine fuels control, including excess native perennial vegetation or excess beneficial non-native perennial vegetation (e.g., crested wheatgrass or forage kochia) through TNR-type measures. We do note that a TNR-type process may not be necessary should true flexibility and adaptive management be built into authorizing grazing through the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	37	General Changes to Regulations	The BLM needs to update the current standards to better reflect the role of ecological processes and mechanisms across all successional phases (stages) of desired (as well as undesired) states so that the concepts of a "healthy landscape" are accurately applied. Early- and mid-successional landscapes (phases) need to be recognized as acceptable and appropriate outcomes of disturbance when they have the desired successional species and the ecological processes needed to progress to desired mid and late successional landscapes are in place. The size of the disturbance may be undesired, but is a separate issue.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Myrin	Nils		UT	1104	2	General Changes to Regulations	Please consider making grazing management decisions on a local site by site evaluation with input and discussion from producers and agency personnel. No consecutive years are alike and flexibility in on and off dates and pasture rotations result in better outcomes than a predetermined schedule.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sims	Scott		WY	734	1	General Changes to Regulations	It is critical to be flexible in management to take into account variable weather trends and plant behavior. Fast grazing moves with adequate rest/recovery time, and rotating season of use, using livestock as a management tool, is vitally important to sustain and improve soil health. Range land monitoring proves this works.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	8	General Changes to Regulations	Instances also exist when the permittee's off-date for a BLM allotment is five days before the on-date for their adjacent Forest Service allotment. The BLM should afford flexibility for on/off dates to address these issues. In Utah, at least two weeks, and preferably one month, of flexibility should be given outside of permitted dates to provide necessary site-specific discretion to manage landscapes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	32	General Changes to Regulations	If the ultimate goal is to prevent repeated fire and provide the opportunity for sagebrush and other non-sprouting shrubs to establish and increase, targeted grazing is a viable tool for these areas as well, and should be included in this assessment.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Oman	Milt			1138	1	General Changes to Regulations	I feel that there should be more flexibility and communication between the BLM and permittees on grazing dates forage available. I also feel that BLM needs to work on the amount of fuel left for fire more flexibility on fire fuel and length of time grazing is deferred.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Casey		NV	748	2	General Changes to Regulations	Grazing regulations should include a streamlined and workable process for allocation and use of grazing forage, when it is available to be used in a responsible way, even if outside of grazing permit dates, terms, and conditions. This would be similar to the current Temporary Non-Renewable (TNR) permit process that has become unworkable and essentially unavailable, against the whole intent of TNR, due to bureaucratic hurdles. There should specifically be included measures to allow for targeted cheatgrass grazing or other fine fuels control through TNR-type measures. It is crucial for the regulations to mandate reliance on current rangeland science - Ecological Site Descriptions (ESD) and their associated State and Transition Models/Disturbance Response Groups to inform objectives and differing levels of grazing allowed. An understanding and description of the ecological shifts or transitions that have occurred due to disturbance, such as wildfire, or legacy management are imperative in order to frame management objectives under any grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Vivian		NV	1134	5	General Changes to Regulations	Flexibility is a must! Ranchers need to have the flexibility to work with the range cons when climate, or other changes occur that may affect the grazing. Changes need to be possible on a local level, within a reasonable timeframe.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	18	General Changes to Regulations	BLM should reflect the change to the landscape rather than manage for an ecological state that would never exist on the landscape. BLM should have the flexibility to manage current conditions, and not desired conditions due to a catastrophic events that severely modify the landscape.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	27	General Changes to Regulations	BLM already has the authority to reduce at any time the number of livestock and the period which they graze. No more regulatory authority is needed for agency action in this area. However, the unstated reason behind the request for increased flexibility is to remove the limit on the amount of grazing and when it occurs. The argument that grazing earlier or in greater numbers than now permitted helps control wildfire and improves rangeland health is largely unsupported in fact rejected by independent objective science.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	1	General Changes to Regulations	A lack of permit or process flexibility limits our ability to reasonably adjustment management to match annual conditions. Because of year-to-year variability in weather, phenology, and unpredictable natural and human-caused disturbance, adaptive management of rangelands in the arid west requires greater management flexibility. TNC agrees that well-managed livestock grazing systems can promote healthy, diverse, and resilient landscapes for people, wildlife, and ecosystem services.l But to be effective implementing additional flexibility, the BLM needs thoughtful, science-based planning and real-time adaptive management examples.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	13	General Changes to Regulations	* Grazing regulations should include a streamlined and workable process for allocation and use of grazing forage, when it is available to be used in a responsible way, even if outside of grazing permit dates, terms, and conditions. This would be similar to the current Temporary Non-Renewable (TNR) permit process that has become unworkable and essentially unavailable, against the whole intent of TNR, due to bureaucratic hurdles. There should specifica lly be included measures to allow for targeted cheatgrass grazing or other fine fuels control through TNR-type measures.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	19	General Changes to Regulations	We support targeted grazing as a fine fuel management tool. The regulations will better facilitate use of this tool by incorporating the following changes: · The issuance of targeted grazing permits should be issued under programmatic NEPA (including this EIS) and site-specific applications categorically excluded from NEPA analysis. · Targeted grazing authorizations should be separate from regular grazing authorizations. That is, the Animal Unit Months (AUM) authorized by such permits should not count as or reduce the number of AUMs permitted under existing grazing preference or term permit. · Targeted grazing authorizations should not conflict with existing grazing preference or term permits. · BLM Instruction Memorandum No. 2018-109 provides direction so that targeted grazing authorizations can be issued and administered with the appropriate flexibility necessary to achieve the desired management objectives. · 43 CFR 4160 provides BLM with authority to issue decisions authorizing nonrenewable grazing permits in full force and effect.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Tim	LazyT2 Ranch	ID	1261	22	General Changes to Regulations	We support targeted grazing as a fine fuel management tool. The regulations will better facilitate use of this tool by incorporating the following changes: -The issuance of targeted grazing permits should be issued under programmatic NEPA (including this EIS) and site-specific applications categorically excluded from NEPA analysis. -Targeted grazing authorizations should be separate from regular grazing authorizations. That is, the Animal Unit Months (AUM) authorized by such permits should not count as or reduce the number of AUMs permitted under existing grazing preference or term permit. -Targeted grazing authorizations should not conflict with existing grazing preference or term permits. -BLM Instruction Memorandum No. 2018-109 provides direction so that targeted grazing authorizations can be issued and administered with the appropriate flexibility necessary to achieve the desired management objectives. -43 CFR 4160 provides BLM with authority to issue decisions authorizing nonrenewable grazing permits in full force and effect.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	8	General Changes to Regulations	TNC supports adjusting the grazing regulations to improve flexibility and adaptive management in livestock grazing to help address seasonal variability so long as sufficient measures of accountability are also incorporated. TNC recognizes that western rangelands are landscapes that experience dramatic variability year-to-year and encompass incredible diversity across the range. Strict management guidelines are often insufficient to capture and address this variability and lead to failures in resource conservation and restoration.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kildew	Kim	Boulder Creek Ranch	ID	1483	1	General Changes to Regulations	This letter advocates more enhance local and user centered input, operation, and control of land management under the umberalla of the standards for general protection of the range land promlугated by the BLM. Also allowing for localize examination of grazing conditions each year should be the center peace to proper rangeland utilization, enhancement, and protection. Flexible turn out times, modification of seasonal use and AUM numbers could establish starting points fir a flexible template for operation of each allotment. Seasonal modifications due to changing conditions on the ground from yearly changes in amounts of snow, rain, or drought should be permitted under the umbrella of a total use formual tied to range health.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bottari	Paul		NV	1205	5	General Changes to Regulations	There should be more flexibility to change BLM allotment boundaries. If it is more beneficial for an allotment boundary to run differently or to remove some public lands from an allotment and make it it's own allotment then this should be able to happened by local District and with local input of the advisory councils without having to wait for a District Plan to be completed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	26	General Changes to Regulations	The use of September 30 as the date for when perennial plants stop growth us not grounded in reality, especially at the spatial scale of this effort. The important physiological stage for management is when the plant has produced viable seed. At that time, the plant has stored the maximum amount of energy in its buds and roots for their survival during the upcoming dormant season and initiation of growth the following year. This assumes the growing season utilization was roughly 50% or less. For perennial herbaceous species in Nevada, seed set typically occurs from early to mid-June at valley locations, and mid-June to mid-July at upper elevations. Even in moist and wet meadows, most plants have seeded out by early July to early August. For example, in mid-July of this year, while on field tours in the Santa Rosa Mountains, Letterman's needlegrass at 7,200 feet was filling seed and for Idaho fescue the seed was ripening. Three Poa species in meadows were at the seed ripening stage. Using a September 30th date does not match biological reality in most situations, and flexibility is the most important criteria for success of this project.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cozzens	Paul	Iron County Commission	UT	1492	6	General Changes to Regulations	Temporary Nonrenewable Grazing (TNR) -Grazing allowed due to forage circumstances or noxious weed control. Streamline and add flexibility. Streamline by putting into place full force on EA decisions for TNR grazing once the document is completed. In most cases, the implementation of the plan is held up due to required reviews by the state offices and by the time a decision of record is made, the temporary situation is passed. Flexibility by allowing the decision maker to be the BLM Field Office and range technicians without having to seek delayed approval from above. Fifteen (15) day shoulder season flexibility without TNR. Allow BLM Field Office the flexibility to change turn on/off dates because of forage conditions, noxious weed control, etc.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	19	General Changes to Regulations	Temporary Non-Renewable (TNR) Animal Unit Months (AUM) should be readily available as a tool for managers when favorable precipitation events occur and when successful fire rehabilitation or range improvement projects happen A programmatic EIS can be conducted to make TNR AUM's available for managers to use. Just as AUM's can be cut for resource protection, without an analysis, AUM's should increase when conditions and resources warrant it without going through lengthy andunnecessary analysis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	5	General Changes to Regulations	Targeted grazing should be used to reduce fuel loads. In years of abundant forage, efforts should be made by the agencies to analyze current wild land fire risks and then collaborate with permittees in the affected areas to use and manage the excess forage. Practices considered to do this could be temporary electric fencing, increased numbers, water haul sites and herding. Action to make available all tools needs to be considered. Ability to place fencing and water hauls must not be hampered. During the growing season decisions to manage excess forage must be done promptly. Under current conditions TNR does not effectively make it possible to achieve targeted grassing during years of abundant forage. TNR needs to change to a more reliable regulation giving district managers swift ability to make timely decisions. Managing fuels in the winter must be flexible to avoid inclement weather. Additional AUM'S (TNR) or new equivalent must be granted quickly to make the best management decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	2	General Changes to Regulations	Permits should allow flexibility and be managed through an outcome based plan. Permittees should be allowed to continue good practices and be granted more flexibility to meet range land objectives through an outcome based grazing system. If permittees are not meeting standards or making significant progress towards standards, due to current management practices, a plan should be made on an annual basis through collaborative monitoring to allow the livestock management to meet the proper standards and rangeland health objectives. Plans should not put undue hardship on permittees but should be organized to meet objectives through a collaborative, agreeable effort. Where standards are not being met, every effort to plan, coordinate and manage respective areas should be exhausted before any major restrictive regulations be placed upon the permit holder. A descriptive tool list should be considered through science based range management practices. Regulations should make it simple for the 001 to work on an even level and understanding basis to promote good relations and good management practices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	2	General Changes to Regulations	Outcome-based grazing has great potential to allow ranchers an opportunity to achieve rangeland health goals on public land, while allowing greater flexibility in livestock management decisions

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kern	David			1196	1	General Changes to Regulations	More flexibility on season dates depending on the water and snowpack. Utilize the forage in helping control wildfires. Control of noxious weeds.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Robinson	John	Idaho Conservation League	ID	1341	3	General Changes to Regulations	In order to accommodate increased flexibility, the BLM and permittees need to improve baseline and real time monitoring, provide for increased accountability, establish soft and hard triggers for reevaluating and changing management, and have more frequent adaptive management reviews
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	1	General Changes to Regulations	The BLM should to consider targeted grazing and outcome-based grazing as a management tool for wildfire fuel prevention and mitigation BLM managers and livestock operators can use outcome-based grazing to respond to changing, on-the-ground conditions, such as wildfires, high moisture years, or drought. Properly grazed landscapes result in landscapes that burn less intensely and recover quicker than ungrazed landscapes in instances of wildfire.1 Moreover, targeted grazing can reduce the wildfire length and rate of speed, and is generally more cost effective than other treatment methods.2 Proper livestock grazing improves rangeland health and reduces the damaging effects from wildfire.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cooper	Mary Anne	Oregon Farm Bureau	OR	893	1	General Changes to Regulations	We support improvements in permit administration, particularly changes that allow for greater flexibility for using grazing to address and reduce fuel loading on public lands. Wildfire is one of the top threats to land management and habitat across the Western United States, and grazing is one of the most efficient and economical ways to control fuel loads on public lands. Further, we encourage BLM to evaluate additional ways to improve grazing permit administration, specifically adding provisions that clearly allow for the use of a categorical exclusion and the provision of adequate time for trailing when moving between allotments and ensuring that ranchers who are making good faith efforts to gather and move their cattle between allotments are not charged with trespass. This has been an increasing issue in some districts across Oregon, and OFB strongly encourages BLM to ensure that there is adequate flexibility in the regulations to allow for use the categorical exclusion and to prevent an overly prescriptive application of these provisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Collett	Brian		ID	1005	6	General Changes to Regulations	We support expansion of the use of grazing to reduce fuels on landscape scale. Current grazing at 20% utilization led to significant fuels buildup and fire damage. Grazing for fire reduction should be a BLM priority and should trump other standards and guides.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	16	General Changes to Regulations	We suggest that provisions be made in the revised rules to require the BLM permittee to coordinate with abutting private land owners to address such fencing and trespass issues perhaps via the cooperative range improvement agreement process.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hart	Charles	Society for Range Management	CO	1076	2	General Changes to Regulations	We suggest Targeted Grazing be incorporated in the regulation to achieve resource management objectives including "Land Health". Targeted Grazing will allow for reduction of fuel loads, improve management of invasive species, manage vegetation to provide wildlife habitat, etc.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	2	General Changes to Regulations	we strongly support the BLM's efforts to provide greater flexibility in the regulations for targeted grazing to reduce fuel loads. This is especially important in Greater Sage-grouse habitat, in the wildland-urban interface and in key watersheds. Targeted grazing to reduce the spread of invasive species and noxious weeds or to create fuel breaks should not be administered under the 43 CFR 4100 Grazing Regulations. Instead, targeted grazing should be administered like fuels projects, under contracts with clearly stated goals. In many instances, the BLM may have to pay for these services as animal performance often declines (compared to other types of grazing) and it does not make economic sense for livestock producers.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sewell	James	TA Ranch	WY	1178	1	General Changes to Regulations	We feel like that will have the cattle graze different plants in different parts of the pasture. I feel that it should be easier to change the use dates on a certain permit to account for that.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riggs	Kelly	Four Rives Field Office		1502	1	General Changes to Regulations	We are asking for flexible seasons of use and the possibility of increased AUM's, tools that would help us reach that 50% utilization goal on predominately-perennial grass allotments and more on predominately annual grass allotments. Ultimately, this would help us all (BLM, permit holders, taxpayers, and the public) reduce the impact of this devastating wildfire cycle we find ourselves in the middle of. Your office should realize that grazing is the most cost-efficient method available to help reduce excess fuel loads.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon D.	Cripple Cowboy Cow Outfit, Inc.	CO	1250	11	General Changes to Regulations	Water; water should never be a condition of permit issuance for the same reasons as above. Neither should BLM file on any water except that which exists because of their own water projects.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baltzor	Catherine		OR	929	1	General Changes to Regulations	Utilizing domestic livestock to graze cheat grass when it is green and grows earlier in the season than the perennials would be a flexibility tool to enhance the land health instead of strictly going by a specific date of turnout. Cattle will eat the cheat grass and thus assist in keeping it at bay and at the very least, reducing the fine fuel loads to discourage wildfires. With cattle grazing already being an authorized use, I would propose this technique over mechanical or chemical removal of invasive grasses whenever feasible
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Tammy			1137	8	General Changes to Regulations	Utilize free use permits to manipulate vegetation to reduce fire risk.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	907	2	General Changes to Regulations	Use of Ecological Site Descriptions (ESD) should not be part of decision making because they are inaccurate and incomplete in development and untested. These ESDs are continually being updated and changed, therefore decisions and management changes should not be based on this incomplete information.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Laurie		NM	1374	4	General Changes to Regulations	Use a merit-based system with livestock operators who get rewarded for adhering to regulations and being good stewards of the land
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ohs	Brian	Montana Stockgrowers Association		1163	1	General Changes to Regulations	Updating and modernizing the regulations, including revising definitions to provide more accurate and concise descriptions of the terms, and to align with current statutory, and regulatory authorities; rewording certain sections to improve readability and understanding; and considering ways to improve grazing permit administration, such as: transfers of grazing preference; provisions that allow for greater flexibility for using livestock grazing to address fuel loads and protect areas with high quality habitat from wildfire; continued Resource Advisory Committee review of rangeland improvements and allotment management plans; and emergency public consultation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sedman	Bruce		WY	763	1	General Changes to Regulations	turnout dates should be flexible if cheatgrass and other early season weeds need management
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cooke	Daniel		OR	1209	3	General Changes to Regulations	Track site specific economic data of grazing fees and the costs of permit administration.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Naples	Jean		NY	386	2	General Changes to Regulations	To ensure full protection for these grazing wildlands, the BLM must require grazing management to improve carbon sequestration in soils. All grazing management practices must ensure full preservation of the habitat of grazed lands to protect native plant and wildlife species and not impede grazing lands from serving as habitat for native predators.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Laurie		NM	1374	3	General Changes to Regulations	Tier unauthorized grazing procedures with defined minor infractions being addressed informally while more serious, or repeat offenses, be tiered higher, requiring penalties and fines, and if need be, impoundment of livestock. Document all tiers

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	3	General Changes to Regulations	This must include grazing reductions and/or grazing removal for lands so passive restoration and healing to buffer climate stress, prevent weeds and preserve waters and watersheds takes place.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cunningham	Sean		OR	1231	2	General Changes to Regulations	Things to consider: -AUMs authorized by such permits should not count toward the permitted AUMs of an existing preference grazing right or term permit. -Such permits should not be issued if they conflict with existing preference grazing rights or term permits -The issuance of such permits should be categorically excluded from NEPA analysis -Such permits should be administered with the appropriate regulatory flexibility (as expounded in BLM Instruction Memorandum No. 2018-109) necessary to achieve the desired management objective -This action is not subject to Protest or Appeal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Greeman	Michelle		NM	1090	6	General Changes to Regulations	These regulations should require the BLM to coordinate, consult and cooperate (CCC) with existing permittees before giving a crossing permit to the applicant.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	1	General Changes to Regulations	There should specifically be included measures to allow for targeted cheatgrass grazing or other fine fuels control through TNR-type measures. We have struggled for years in an attempt to get TNR approved so that we can mitigate increased fuel loading and slow the spread of annual invasive plants with late season grazing. We have been unsuccessful on both fronts due to the nearly impossible process of getting TNR approved because someone with no affected interest in our operation can appeal the application for the cost of simple first-class postage stamp.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Collett	Brian		ID	1005	4	General Changes to Regulations	There should be changes in how adverse rangeland health determinations are applied. These should only be applied to specific pieces of land and not across pastures and/or allotments. Additionally, there may be several possible solutions to a specific problem rather than just a blanket cut of AUMs. Sufficient time is needed to truly identify the cause(s) of an issue and to implement appropriate management changes rather than immediately take the action of cutting AUM's.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brinker	Debra		OH	927	1	General Changes to Regulations	There should be accurate population numbers for grazing cattle and sheep and they should be removed if it is shown that they are degrading the public lands and the water.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cockrell	Will & Debra		CA	1017	3	General Changes to Regulations	There needs to be provisions for livestock grazing to be authorized as a fuels reduction tool to help avoid the spread of future wildfire. This action is not subject to Protest or Appeal.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eliason	Ken		ID	993	1	General Changes to Regulations	There needs to be more common sense and flexibility with dates of use, and how the BLM pastures are used and managed. The Ranchers hands are tied and in many ways we cannot help manage the pastures in ways we think are better.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Van Hying	Dyrck		MT	1376	2	General Changes to Regulations	There is no positive correlation in the scientific literature that suggests grazing can achieve either outcome and a large body of evidence to the contrary. In fact, grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bellwood	Samantha	Nevada Department of Agriculture	NV	1009	11	General Changes to Regulations	There is a need to facilitate timely livestock movement to and from grazing allotments. Issuing authorizations without additional analysis and decision time to address permittee needs for livestock movement will increase the timeframe for livestock movement.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	2	General Changes to Regulations	There has been much contemporary discourse about providing for sustainable permittee flexibility to manage for fluctuations in weather or accommodate other management needs by implementing an adaptive management framework. Perhaps the BLM needs to create manual or handbook guidance regarding the adaptive management process and include references to such guidance in the revised regulations as appropriate, or needs to establish such guidance directly through the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Collett	Brian		ID	1005	2	General Changes to Regulations	The use of temporary non-renewable permits should be allowed in order to better manage during seasons of above normal precipitation and high fuel loads. There should be a mechanism in place to enable the BLM to act in a timely manner rather than be bogged down in the NEPA process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ohs	Brian	Montana Stockgrowers Association		1163	8	General Changes to Regulations	the use of categorical exclusions should be implemented if renewals are routine and changes are not significant enough to require an environmental assessment or environmental impact statement.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Correll	Leanne	SER Conservation District	WY	1066	2	General Changes to Regulations	The updated Regulations should focus more on opportunities for Outcome Based Grazing and place emphasis on this approach. While the current grazing regulations provide for this approach, emphasis is on prescriptive grazing regardless of on-the-ground conditions, not flexible grazing based upon using livestock as a tool to achieve desired conditions. Grazing regulations should allow for grazing permit flexibility and foster the partnership of BLM and grazing permittees to identify desired outcomes and implement management strategies that work toward the desired outcomes. Vast differences exist between allotments and even between pastures within allotments, so flexibility is key to achieving and maintaining land health across these differences over time. The weather and range conditions change from year to year so the grazing permits should also allow for appropriate changes. The high degree of variability in yearly weather conditions should allow for a high level of flexibility for management of the resources impacted by this weather variability.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Correll	Leanne	SER Conservation District	WY	1066	7	General Changes to Regulations	The SER CD urges the BLM to incorporate the disclaimers listed in the Tech Ref 1734-6 regarding the intended uses of rangeland health assessment into the narrative that references the fundamentals of rangeland health. Rangeland health assessments should not be used to: a. "Identify the cause(s) of resource problems. b. Independently make grazing and other management changes. c. Monitor land or determine trend. d. Independently generate national or regional assessments of rangeland health."1 1 BLM. 2005. Interpreting Indicators of Rangeland Health. Technical Reference 1734-6 version 4.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	24	General Changes to Regulations	The regulations should revise the provisions regarding Exchange of Use Agreements to clarify that Exchange of Use will be linked to the respective state law regarding "fence out" and "open range." This issue is primarily focused on railroad "checkerboard" where the ownership of the various parcels is complicated and involve many different landowners. The current regulations seem to support that unfenced private lands in these areas are not available to graziers without a signed lease or court order. We are convinced that Nevada law, including case law and Attorney General opinions, have consistently held that Nevada, as a "fence out" state, grants permission to grazing "livestock running at large on the ranges or commons" (NRS 568.300) of unfenced private lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Casey		NV	748	5	General Changes to Regulations	The regulations should require, in coordination with ranchers, management decisions are based upon the best rangeland science, that flexibility is built into grazing permits to allow for adaptive management as issues and concerns arise, and that that quality and quantity of data collected can support all decisions made. The regulations should ensure that every feasible option is pursued before any restrictive actions is taken against grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	22	General Changes to Regulations	The regulations should include wholesale changes from "permit holder" or "permittee" to "preference holder." This would return to the intent of the Taylor Grazing Act and true grazing preference. With this change should also come a recognition of the initial preference in AUMs allotted through the Taylor Grazing Act. Further, any suspended AUMs should remain on all grazing permits under the preference holder's name. Ensuring preservation of preference and full preference AUMs would empower and bolster the ability to impalement adaptive management and outcome-based grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	21	General Changes to Regulations	The regulations should include clarification that if a permitted use for a grazing permit is to be reduced due to another permitted multiple use, such as mining, any reduction would be based on field work and monitoring to quantify the actual forage lost. Not some simple math exercise as we have often seen occur (e.g., simply dividing total AUMs across an allotment into the acreage lost to grazing due to mining disturbance).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loehlein	Kenneth	Wildearth Guardians	WA	686	2	General Changes to Regulations	the regulations should facilitate greater levels of public engagement by the following: posting monitoring reports online for public review, inviting interested public to attend field visits, and notifying the public of all grazing permit applications and decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	23	General Changes to Regulations	The regulations should ensure that base property requirements, land and/or water, are retained. But, it should be clarified that base property is to support a ranching operation when livestock are not grazing BLM-administered land but is not required to fully sustain, on its own, the ranching operation (e.g., a ranch buys and feeds hay to fully sustain the herd when not grazing under the permit).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	17	General Changes to Regulations	The regulations should ensure that any long-term grazing decision or permit renewal is based on long-term (not "snapshot" in time), objective quantitative data through valid monitoring protocols, acceptable under current rangeland science standards. Qualitative data is appropriate and should be used for short-term and day-to-day decision making through adaptive management. To assist with monitoring and data collection for both short-term and long-term grazing decision making, BLM should memorialize in the regulations Cooperative Monitoring, as outlined in the MOU with Public Lands Council.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Back	Gary			1207	7	General Changes to Regulations	The regulations should be modified to include for temporary strategies (i.e., flexibility) to address short-term unplanned or uncontrollable events.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mori	Peter	Mori Ranches, LLC		1149	3	General Changes to Regulations	The regulations should allow for fuels reductions by having the ability to reduce excess fuel loading by grazing. The BLM had a tool to do this in the past that was known as temporary non-renewable use. It was very effective and should be reinstated as a responsible way to address the fire and fuel loading issue. This process needs to be streamlined to make possible a rapid response to the issue that needs to be addressed i.e. invasive plant infestations, noxious weed control, etc.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	15	General Changes to Regulations	The regulations should allow extending the duration of grazing from 10 years to 20 years. The time it takes to follow the current permit renewal process is extensive and currently can take up to 5 years or more for a permit to be fully processed. The current timeline does not allow for any potential management changes to be assessed appropriately. Again, a true adaptive management approach under the regulations would help overcome some of these difficulties.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mariluch	Angie			1212	1	General Changes to Regulations	The regulations need to allow flexibility with livestock grazing in order to use grazing as a tool to reduce the tremendous fuel loads that are encouraging catastrophic wildfires in the west
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mariluch	Angie			1212	5	General Changes to Regulations	The regulations need to address the wild horse issues in the allotments. The non HMA areas are overpopulated with horses and the gathers are so far behind they will never catch up. Also, the HMA's are spilling over with horses and the excess are inhabiting the other places like residential areas. This mismanagement needs to be replaced with wild horse management. Since we are the subject, why are only cattle being discriminated on. Cattle seem to be taking the blame for all the evils of the allotments. This is true, so please address in new regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	909	1	General Changes to Regulations	The Range Science profession does not support the BLM's program to assess "proper functioning condition" on riparian areas because the BLM – PFC program is a qualitative assessment process that doesn't actually assess the "functioning condition" of anything.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	14	General Changes to Regulations	The range science profession definition contained in the Society for Range Management (SRM) "Glossary of Terms Used in Range Management" 4th edition, uses and recognizes this concept. The Resource, Assessment and Monitoring (RAM) committee of the SRM is on record that the BLM's current process of trying to evaluate "utilization" prior to the end of the growing season is an improper use of this management tool and is not consistent with how the range management profession views this subject.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062	14	General Changes to Regulations	The Proposed Rule should identify livestock grazing permittee names and addresses as private information not to be disclosed under Exemption 6 of the Freedom of Information Act ("FOIA") because of the substantial privacy interest in that information and how that information can be combined with other information on a permit to violate basic privacy principles.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cargill	Emilia	GEYSER CATTLE COMPANY LLC	NV	1255	4	General Changes to Regulations	The new regulations should include flexibility for the Permittee to manage the range in its permit, and to quickly and easily obtain permission to modify use of the resource. Adaptive management tools would be key in implementing flexible and targeted grazing, and moving away from outcome based grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bellwood	Samantha	Nevada Department of Agriculture	NV	1009	13	General Changes to Regulations	The NDA supports Outcome Based Grazing (OBG) authorizations on BLM lands. OBG is a tool that needs to be allowed on a case-by-case basis. Certain allotments and permittees/lessees operations may qualify to apply to have their operations enrolled into a OBG agreement. OBG allows for maximum management flexibility for both the BLM and the petinittee/lessee. The permittees/lessees are responsible for meeting land health standards, objectives and monitoring under the agreement. The BLM should be moving toward additional OBG management efforts throughout the state.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	10	General Changes to Regulations	The intent of the 1995 regulations was to allow an individual who controlled a piece of property through a lease to gain access to grazing preference. However, now individuals are doing lease agreements (without truly leasing the land) to other operators. All such issues would go away if we moved away from using base property as the sole means to establish qualification for preference. Perhaps simply providing documentation demonstrating that the individual owns livestock and has a brand registered in the state would be adequate, in my opinion. I'm certain there's many ways this could be done in an equitable manner, but overall I encourage you to at least consider some alternatives to qualifying for preference, besides base property.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	1	General Changes to Regulations	The grazing regulations should seek to streamline the process to approve and implement range improvements, particularly water development and distribution projects. Water is the limiting factor for most livestock operations across the arid west and limits the amount of habitat available to wildlife. Thus, a more development friendly regulatory framework would serve to allow the most limiting factor for both livestock production and wildlife populations to be addressed in a timely manner. Existing restrictions on the use and placement of nutritional supplements on public grazing lands should also be revised. Supplementation with products that are currently restricted and/or in locations that are currently prohibited will often be necessary or beneficial to successfully implement targeted grazing and outcome based grazing projects or other prescriptive grazing programs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	19	General Changes to Regulations	The grazing regulations should include a streamlined and workable process for allocation and use of grazing forage, when it is available to be used in a responsible way, even if outside of grazing permit dates, terms, and conditions. This would be similar to the current Temporary Non-Renewable (TNR) permit process that has become unworkable and essentially unavailable, against the whole intent of TNR, due to bureaucratic hurdles. There should specifically be included measures to allow for targeted cheatgrass grazing or other fine fuels control, including excess native perennial vegetation or excess beneficial non-native perennial vegetation (e.g., crested wheatgrass or forage kochia) through TNR-type measures. We do note that a TNR-type process may not be necessary should true flexibility and adaptive management be built into authorizing grazing through the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gooch	Scott and Kaila			1497	3	General Changes to Regulations	the fuel load is higher than ever. An increase in Aums needs to take place for some years until the native plant community cna recover. This is not happening and these areas are susceptible to repeated burning. Local BLM should be able to use something like Temporary Non-Renewable AUMS to respond to these situations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	1	General Changes to Regulations	The draft regulations and EIS should address the fuel reduction benefits of stocking allotments at historic preference numbers and promote the use of targeted grazing when the reduction of fuel loads is needed in specific areas to protect these important rangeland values. Targeted grazing should be incorporated into the regulations addressing permit terms and conditions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hart	Charles	Society for Range Management	CO	1076	3	General Changes to Regulations	The current regulation includes several pages on permit violations and prohibited acts but little to encourage innovative management. Consider incentivizing innovation for lessee's grazing management. Support successful outcomes that improve or maintain desirable resource conditions. Recognize that planned outcomes are not always achieved without cooperation of nature and may require additional inputs to achieve. Work with interest groups, producers and land managers to find new and innovative ways to successfully manage the land. Incorporate the fact that innovative actions don't always produce the intended outcomes. Administrative actions need to be on fixing problems to meet land and ecosystem goals and less on supposed violations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	6	General Changes to Regulations	The BLM's grazing regulations revision should insist that any use of targeted grazing on public lands be supported by a robust and public environmental analysis of the cost/benefits of using this "tool."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	25	General Changes to Regulations	The BLM should take the opportunity with this revision of grazing regulations to make explicit the necessity of testing water quality.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	11	General Changes to Regulations	The BLM should look at simplifying and modernizing these evaluations by using remote sensing where appropriate. Range staffing in BLM offices continues to be reduced and we must find ways to increase efficiencies. Only data that is most helpful in making decisions should be collected. The local universities and the Society for Range Management should be included in discussions regarding ways to evaluate rangeland health quickly and effectively.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	15	General Changes to Regulations	The BLM should evaluate what it has learned thus far from the Outcome Based Grazing program and incorporate any findings that would increase administrative efficiency into its grazing regulation revisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	16	General Changes to Regulations	The BLM should also not allow for the purchasing and retiring of grazing permits. The retiring of grazing permits leads to the diminishment of the ranching industry and has significant economic impact.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	18	General Changes to Regulations	The BLM should also enact regulations that would allow for temporary structures such as fencing to allow for high impact grazing to achieve a specific fire management goal.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cunningham	Sean		OR	1231	1	General Changes to Regulations	The BLM needs to use Temporary Non-Renewable Grazing Permits as a fine fuel reduction tool across much of the public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rose	Brent	Northwest Utah Grazing Advisory Board	UT	848	1	General Changes to Regulations	The BLM needs to consider targeted grazing and outcome based grazing as a management tool for wildfire fuel prevention and mitigation. Properly grazed landscapes result in landscapes that burn less intensely and recover quicker than ungrazed landscape in instances of wildfire (Davies et al. 2009). In addition, targeted grazing can reduce the wildfire length, rate of speed, and is generally more cost effective than other treatment methods (Diamond et al. 2009). Proper livestock grazing results in positive impacts to rangeland health and reduces negative effects from wildfire.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rose	Brent	Northwest Utah Grazing Advisory Board	UT	848	5	General Changes to Regulations	The BLM needs to address and implement protection to grazing permits that are waived without preference. When a permittee retires his/her operation without having someone specific to pass the permit on to, the allotments within that permit still need to remain open to grazing. The BLM needs to implement regulations that protect the right of livestock grazing on public lands. The BLM authorizes grazing by issuing permits pursuant to section 3 of the Taylor Grazing Act, 43 U.S.C. § 315b (2000), which requires that "preference" in issuing grazing permits be given "to those within or near a district who are landowners engaged in the livestock business, bona fide occupants or settlers, or owners of water or water rights, as may be necessary to permit the proper use of lands, water or water rights owned, occupied or leased by them" This means that the BLM needs to ensure that grazing permits should not be retired or given a non-use classification when the land is capable of sustainably authorizing livestock grazing and resulting in meeting or moving toward rangeland health conditions. The BLM needs to have strong language in their regulations that would not allow Congress to easily pass legislation that can retire grazing permits when the land is still capable of sustainably authorizing livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	5	General Changes to Regulations	The BLM grazing regulations should be revised to establish how and when targeted grazing can be authorized to provide for specific vegetation treatments to meet vegetation management objectives, including objectives to provide for fuel breaks and fuel load reduction projects to reduce wildfire risks and promote opportunities to enhance wildfire suppression efforts should suppression be necessary.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yoder	Paul		NM	755	8	General Changes to Regulations	The arid west cannot support the inevitable overgrazing of rangeland that currently goes hand in hand with Big Ranching. Native ruminants, like bison and elk, are continually moving then grazing then moving. Cattle move slowly until most if not all of the easily accessed of their favored forage is consumed. ACTION: subsidize native ruminant reintroduction and ranching (e.g. - bison & elk). Offer tax credits and lower grazing fees for native grazers' ranching.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mori	Peter	Mori Ranches, LLC		1149	1	General Changes to Regulations	The ability to change the time and timing and permitted livestock numbers of grazing in the event of variations in precipitation, temperature, drought, fire, floods, and other natural occurring events is critical to sustainable rangeland health. This flexibility needs to be a simple process that can be done in a timely manner so as to get the most out of response to need.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	19	General Changes to Regulations	Temporary nonuse to accomplish management objectives should be allowed but elimination of grazing in favor of some other use is not consistent with the legislation that authorizes these regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burton	David		UT	1057	2	General Changes to Regulations	temporary non-renewable permits need to be used as resource management tools for both fire suppression and weed control.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rose	Brent	Northwest Utah Grazing Advisory Board	UT	848	9	General Changes to Regulations	Temporary Non-Renewable (TNR) Animal Unit Months (AUM) should be readily available as a tool to managers when favorable precipitation events occur and when successful fire rehabilitation or range improvement projects happen.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lyons	Scott	Box Elder County Commission		1140	3	General Changes to Regulations	Temporary Non-Renewable ("TNR") Animal Unit Months ("AUMS") should be readily available as a tool to managers when favorable precipitation events occur, when successful fire rehabilitation happens, or when range improvement projects take place. If needed, a programmatic Environmental Impact Statement ("EIS") for all of the BLM should be conducted to make TNR AUM's available for managers to use. Just as AUM's can be cut for resource protection, AUM's should also be able to just as easily increase when conditions and resources warrant it.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	10	General Changes to Regulations	Targeted Grazing, allow use of targeted grazing for vegetation management. o The BLM grazing regulations should be revised to establish how and when targeted grazing can be authorized to provide for specific vegetation treatments to meet vegetation management objectives, including objectives to provide for fuel breaks and fuel load reduction projects to reduce wildfire risks and promote opportunities to enhance wildfire suppression efforts should suppression be necessary.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davies	Lou		OR	837	1	General Changes to Regulations	Targeted grazing can be a most beneficial tool . Due to weather conditions sometimes the most opportune time for grazing may not be the original targeted date. The opportune time may be earlier or later depending on temperature and moisture. The local people, Range Con and permittee would be the best sources to make that call.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Echevarria	Marty		NV	838	2	General Changes to Regulations	Streamline the grazing regulations to allow for hazardous fuels like cheatgrass to be utilized when it is green, before it is in the seeding process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frandsen	Fred	Washakie County Commissioners	WY	1246	1	General Changes to Regulations	so long as resource conditions are favorable, BLM should allow permittees to adjust the dates on which they move livestock on and off of rangelands. Often, in Washakie County, a long winter can impede a permittee's ability to get on public lands for grazing or a warm spring may call for earlier entry. Presently, the dates provided in a permit are rigid-there is no deviating from them without additional analysis. BLM should consider granting for timing flexibility when conditions permit or require.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bulloch	Gordon	MBM Livestock	UT	752	2	General Changes to Regulations	Since then we have had more fires and have had to stay off for two years after each one. It would be nice if the grazing regulations could be more flexible to allow Increased AUM's if the forage is more abundant after major fires, rehabilitation and restoration projects or extreme wet years. If the BLM could be more flexible and make the decisions on the current conditions of the Range and not just what is written on the permit, would be helpful.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	3	General Changes to Regulations	Similarly, MWGA's membership supports eliminating the requirement that a Proposed Decision and a protest period be issued prior to approving a grazing permit and/or lease transfer. MWGA's membership recognizes that some transfers are presently excluded from NEPA review under certain limited circumstances. However, the present regulations still require that before a transferred permit can be issued, a Proposed Decision is still required. This, too, needlessly adds time and bureaucracy to what is a basic administrative process. Eliminating the proposed decision step in this process would significantly reduce needless paperwork and reduce time burdens on BLM staff;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baumann	Jim	Nevada State Grazing Board District N-6	NV	986	1	General Changes to Regulations	Similar to the current Temporary Non-Renewable (TNR) permit process, but in a more workable format, grazing regulations need to be streamlined for use of grazing forage when it is available. The process should include measures to allow for targeted cheatgrass grazing or other fire fuels control through TNR-type processes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	16	General Changes to Regulations	Set a fair and equitable grazing fee based on comparable private land prices
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon D.	Cripple Cowboy Cow Outfit, Inc.	CO	1250	9	General Changes to Regulations	Section 15 leases; Again, there is enough experience, education, and ability to allow ranchers to run the permits without supervision under a lease. Leases and Stewardship Agreements would save BLM money that could be used for other purposes than regulating people and permits.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ackerman	Laura		WA	508	1	General Changes to Regulations	Retire grazing permits and allow for long term conservation use
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris			1188	9	General Changes to Regulations	Restructure every grazing permit, so that grazing is allowable 12 months out of each year, giving both ranchers and land managers an effective tool to reduce excess fuel loads in real-time. Make extended season, change of season or amount of use triggers mandatory when fuel loads exceed ten percent over normal maximum, or when producer has utilized less than 90% of allowable forage with normally permitted numbers during regular grazing season. Require local land managers to trigger out of season turn-outs whenever conditions pose a threat to overall range health. Give ranchers a local arbitration board made up of agency personnel and local producers to appeal any rejection of proposed out of season turn-outs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Tammy			1137	7	General Changes to Regulations	Restore the operative limit of 3 consecutive years of nonuse for personal and business reasons.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Ruby			1176	3	General Changes to Regulations	Resource based grazing that takes in to account the landscape and historical production of the range should be included to allow for flexibility on an annual basis. Increased flexibility annually will decrease the repeated season of use in an area and allow for a better rotation/rest style management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nowlin	Laura		MT	1107	3	General Changes to Regulations	Requiring monitoring to consider ecological site and current ecological site potential, as shown by state and transition modeling, when assessing effects of management actions and effectiveness of management actions in reaching objectives. - Responsible use of livestock grazing as a tool for fine-fuel reduction should be supported.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	14	General Changes to Regulations	Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	MacKenzie	Michelle		CA	953	3	General Changes to Regulations	require grazing management to address climate change and preservation of habitat. This would include improving carbon sequestering in the soil. Habitat value of lands being grazed must be managed to ensure that native plants and wildlife can continue to survive on public lands, where they should have precedence over livestock. This includes ensuring that the lands in question continue to serve as habitat for native predators and that native plants are not destroyed to create more forage for livestock.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	8	General Changes to Regulations	Reinstate "Grazing Advisory Boards" as per Section 18 of the TGA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon D.	Cripple Cowboy Cow Outfit, Inc.	CO	1250	4	General Changes to Regulations	Reductions in grazing preference due to horses; No permittee should lose any amount of preference due to wild horses.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	18	General Changes to Regulations	Range Readiness is one of the most critical aspects determining potential impacts to vegetation as a result of grazing. The new grazing regulations should provide direction on how Range Readiness should be used and incorporated into grazing permits to allow flexibility for the BLM to delay or move up turnout depending on conditions on the range.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Collett	Brian		ID	1005	8	General Changes to Regulations	Range improvements should be owned by permittees if they provided the labor and materials.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon D.	Cripple Cowboy Cow Outfit, Inc.	CO	1250	10	General Changes to Regulations	Public access should not be a condition for issuing a grazing permit; BLM has 1000's of acres of land that are surrounded by private land. Some in our area has been identified for disposal. All of it should be. There are many legitimate avenues BLM can use to acquire access across private land, however, this method is un-American, probably unConstitutional, and if not illegal, should be.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Tammy			1137	6	General Changes to Regulations	Provide flexibility within the terms and conditions of grazing permits to allow changed livestock numbers and a few weeks time either side of the permit dates for livestock grazing as long as the permitted use limit is not exceeded.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hess	Carie	Petroleum County Conservation District	MT	1146	8	General Changes to Regulations	Promoting Land Health. Using livestock grazing to reduce wildfire risk and to improve rangeland conditions. Allowing for flexibility dependent on conditions such as moisture and forage growth. Livestock grazing in many contexts can successfully reduce fuel buildup and provide firebreaks which in turn protect important range resources.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Small	Sue		NM	995	4	General Changes to Regulations	Predator control has been mismanaged as leading towards species extinction, thus, any control measures must be non lethal and scientifically measured for species protection over their range.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ostlie	Nancy			1317	1	General Changes to Regulations	Please use 30%, a conservative utilization, which would mean less riparian trampling, less invasive species, less erosion. A key document is Holechek's review of utilization rates and the benefits of conservative utilization for both the permittee's finances and the ecological condition of the land. Please work a non-use option annually for up to ten years into permittee options in several places. Please review of allotment health conditions at least every ten years.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	18	General Changes to Regulations	Permittees should be required to be in the livestock business- There is no legal basis for releasing permittees from the requirement to be in the livestock business. These regulations apply to livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259	4	General Changes to Regulations	Permit and Lease Flexibility, provide permittee flexibility to manage for fluctuations in weather or accommodate other management needs. -There has been much contemporary discourse about providing for sustainable permittee flexibility to manage for fluctuations in weather or accommodate other management needs by implementing an adaptive management framework. Perhaps the BLM needs to create manual or handbook guidance regarding the adaptive management process and include references to such guidance in the revised regulations as appropriate, or needs to establish such guidance directly through the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309	4	General Changes to Regulations	Permit and Lease Flexibility, provide permittee flexibility to manage for fluctuations in weather or accommodate other management needs. o We are particularly concerned with this issue since we have made many attempts over the years to adjust our grazing rotations to better account for annual resource conditions, including weather events, and have instead been forced to live with inflexible grazing management dictates from outdated plans or drought closure decisions. Opportunities to meet the needs of our livestock operation and the natural resource base that we depend on using flexible, innovative ideas were squandered. o There has been much contemporary discourse about providing for sustainable permittee flexibility to manage for fluctuations in weather or accommodate other management needs by implementing an adaptive management framework. Perhaps the BLM needs to create manual or handbook guidance regarding the adaptive management process and include references to such guidance in the revised regulations as appropriate, or needs to establish such guidance directly through the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	11	General Changes to Regulations	Permit and Lease Flexibility, provide permittee flexibility to manage for fluctuations in weather or accommodate other management needs. o There has been much contemporary discourse about providing for sustainable permittee flexibility to manage for fluctuations in weather or accommodate other management needs by implementing an adaptive management framework. Perhaps the BLM needs to create manual or handbook guidance regarding the adaptive management process and include references to such guidance in the revised regulations as appropriate, or needs to establish such guidance directly through the grazing regulations.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lonn	Jeffrey		MT	958	1	General Changes to Regulations	permanently retire vacant allotments, allow for the permanent buyout of active allotments by non-ranchers, enforce and strengthen standards, and work slowly towards eliminating livestock grazing on public land. The land, wildlife, and water will all be better off, and taxpayer dollars will be saved.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ogden	Garth "Tooter"	Sevier County	UT	1499	4	General Changes to Regulations	Overgrown vegetation leads to a dangerous buildup of combustible fuels. Livestock can play an important role in reducing dangerous fuel loads and therefore reducing the risk of catastrophic wildfires. Livestock producers, governmental agencies, the U.S. military, and other groups have successfully used livestock to create fuel breaks and reduce hazardous fuels in projects across the western United States. The BLM's grazing regulations should be updated to enhance the ability of BLM field offices to use livestock to create fuel breaks and reduce fuel loads. Such use of livestock should happen cooperatively with local governments, States, private landowners, fire departments, livestock producers, and other federal agencies. Livestock grazing is a safe, sustainable, cost effective, and low impact method of hazardous fuels removal that, when used correctly, can have many advantages over other fuel-removal methods, such as mechanical treatments or prescribed burns. Livestock producers benefit when able to use their livestock to reduce hazardous fuels because forage that may otherwise go unused is utilized. The BLM should facilitate the use of livestock to reduce hazardous fuels in both rural areas and in the wildland-urban interface. Highly developed areas on the urban fringe are often the most susceptible to damage from catastrophic wildfires, and livestock can help protect the urban fringe with minimal visual or auditory impact on surrounding communities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yoder	Paul		NM	755	3	General Changes to Regulations	Overgrazing lowers the water table. When a grass is repeatedly cropped by excess chomping, it dies, thus destroying the soil binding of its roots. This loss lowers the soil resistance to rainfall - like micro-bursts. This loss also lowers the soil's water retaining properties. That causes arroyo creation, then their rapid deepening and increasing sediment loading. ACTION: quantify available water. Include monthly measurement of active arroyos and active water wells in and around the allotments. Add and monitor rainfall measuring stations. ACTION: document grazing effects with grass surveys and air photos at least ever 3 months and immediately after microbursts.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yoder	Paul		NM	755	9	General Changes to Regulations	Overgrazing leads to rampant off-road travel. BLM land is public and although regulations exist to thwart off-road forays, there is little to no enforcement. Some ranchers drive where it is convenient despite BLM regulations. Hunters also make off-road forays to make a camp or retrieve game. Casual off-road vehicle operators also venture into prohibited areas. When any of these vehicle operators see pre-existing illegal 2-tracks, they often follow them, then claim they thought it was a legal road. LAWLESS GRAZING INSPIRES LAWLESS OFF-ROAD USE. ACTION: increase LE patrols of allotments at least weekly for road rutting and new road creation. Investigate and fine perpetrators for creating ruts 3 inches deep or greater, or driving on ruts 3 inches deep or greater. ACTION: implement remediation to 1) barrier their further use and 2) return the land to pre-road conditions. ACTION: require annual permits for all vehicles used on BLM lands. Assess permit fees and fines to both cover the permitting cost and enforcement, but also remediation of pre-existing illegal road remediation. ACTION: inspect vehicles for street legal compliance. Cite illegal off-road vehicle use. ACTION: Require wildfire reducing exhaust systems as well as signed vehicle owner responsibility for vehicle caused fires and road damage.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yoder	Paul		NM	755	5	General Changes to Regulations	Overgrazing increases the likelihood of un-naturally hot fires. Cattle spread invasive weeds - like cheatgrass, which grows for a few weeks ahead of most other grasses, dies, then dries, then becomes highly flammable. This produces greatly abundant 1-hour fuels making necessary and natural low temperature wild fires un-naturally hotter, more likely to involve 10 hour fuels, and more likely to grow into a large fire event. Cheatgrass is very difficult to remove once established. Herbicides have become a panacea for the ill effects of over grazing. HERBICIDES KILL OR INHIBIT ALL PLANTS AND ANIMALS. ACTION: require manual cheat grass removal by cited grazing infractors. Recruit local schools, churches, etc. to adopt allotments and provide oversight and care.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yoder	Paul		NM	755	4	General Changes to Regulations	Overgrazing destroys the soil, which is a crucial foundation of all life, including our own! Cattle linger over twice the time of native ruminants in areas of higher grass density - especially riparian areas. Cattle presence more than doubles the trampling effects of the native ungulates. Large grazers crush the soil and destroy its living component, the cyptobiota. This "crypto crust" is like the mulch of a healthy temperate forest. ACTION: document cryptobiotic presence and changes at least every 3 months.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yoder	Paul		NM	755	6	General Changes to Regulations	Overgrazing creates a monoculture of plant species which survive because they are less palatable to cattle. Perennial grasses on this arid and low-Nitrogen Colorado Plateau are extremely slow to regenerate. ACTION: mandate periodic ZERO GRAZING periods for every allotment. Determine frequency and duration using previous year's climate and grazing data and implement by public vote or legislated mandate.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	16	General Changes to Regulations	Overall, the BLM must facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlisle	Celeste	Return to Freedom Wild Horse Conservation	CA	1016	6	General Changes to Regulations	Outcomes Based Grazing Authorizations: In 2017, BLM introduced these authorizations to allow livestock owners greater flexibility to adjust grazing management under changing conditions. Drying conditions in the west and water limitation have changed conditions on public lands, but AUMs have remained consistent from 2008 – 2018. The EA should address BLM providing the oversight to livestock owners so that professional ecologic assessment is the basis for any grazing management change.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barta	Stacey		MT	1220	4	General Changes to Regulations	Outcome based grazing is the direction BLM grazing permits need to be going. There is the opportunity to increase the BLM's flexibility in applying amended management practices (different grazing rotations, different on/off dates) rather than automatically decreasing the number of authorized AUMs on an allotment. Outcome based grazing provides greater flexibility for adjusting grazing use due to changing conditions to achieve specific vegetative, habitat, and livestock operation sustainability objectives. This makes better ecological sense and directs the grazing tool to a desired ecological outcome, instead of general one size fits all grazing tool. Each State, and Field office should be given the authority of flexibility to increase permitting efficiency and move towards an agreed upon ecological outcome with the permittee.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Snyder	Todd		CA	869	1	General Changes to Regulations	ny new regulations must: • Allow for grazing permit retirement and long-term non-use for conservation purposes. This is especially important in the nearly 5 million acres of designated Wilderness on BLM administered lands that are currently open to livestock grazing. • Create no new categorical exclusions and expand use of EAs and EISs to facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. • Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis, while ensuring grazing management preserves the habitat value of grazed lands for native plant and wildlife species and does not impede grazed lands from serving as habitat for native predators. • Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions and forbid destruction of native vegetation to increase forage for livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	France	Tom	National Wildlife Federation		1237	10	General Changes to Regulations	NWF recommends that the proposed rule specify how the change in grazing regulations support BLM's ability to make livestock grazing and range development decisions that enhance and protect known or suspected migration corridors and big game winter range.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	9	General Changes to Regulations	Non-Renewable Permits and Leases, issue decisions immediately effective and provide permittee flexibility to manage for fluctuations in weather or other management needs. o In addition to providing for immediately effective decisions to provide for permittee flexibility to manage for fluctuations in weather or to address other management needs in association with Non Renewable Permits and Leases, similar provisions should be created to cover situations where permittees request authorization for additional forage use on an annual basis as temporary nonrenewable use under an existing BLM term grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harris	Donna		OR	701	2	General Changes to Regulations	No new creation of categorical exclusions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	449	3	General Changes to Regulations	New regulations should notify the public of all grazing permit decisions and offer greater access to public engagement by posting monitoring reports for review and inviting the interested public to participate in field visits
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	449	1	General Changes to Regulations	New regulations should include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. New regulations should set a fair and equitable grazing fee based on comparable private land prices. It is unfair to private livestock growers to compete with those who do not bear the real costs of land health and maintenance on their public lands allotments and it is unfair to the Public who support the management of those public lands through their taxes.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carter	Jacob	Carter Cattle Co.	NV	954	1	General Changes to Regulations	New grazing regulations should focus on the management of maximum flexibility and be adaptive to climate and range conditions. This includes number of livestock and grazing seasons. Grazing seasons should not be limited to rigid arbitrary dates but be able to adapt to chaging and evolving range conditions. In many cases numbers should increase to use the available forage and other times grazing should be limited due to climate conditions. Annual grazing plans should be organized and made by cooperative means between the DOI and permit holder.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Blackburn	Dennis	Wayne County Commission		1363	3	General Changes to Regulations	NEP A analysis for permit renewal in Utah often takes far too long, and can even take years. These delays cause uncertainty for livestock permittees that make it extremely difficult to plan ahead or invest in a livestock ranching business. BLM regulations should require BLM field offices to conduct NEP A analysis for grazing permits in a timely, efficient manner, and if necessary to prioritize grazing permit NEPA over other BLM NEPA projects. Just as the Council on Environmental Quality has recently released a proposed rule that would place hard time limits for federal agencies to complete an environmental assessment or environmental impact statement, the BLM should impose hard deadlines within which a BLM field office must complete NEPA range analysis. Deadlines of this type would give permittees more certainty and give BLM range personnel defined schedules to work with. Livestock grazing will better function as a useful management tool if NEP A analysis happens promptly and efficiently.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mackay Dean	Shelley		MT	1380	2	General Changes to Regulations	Needs to be more flexibility in grazing periods. This would allow for faster response to climatic factors and management decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keck	Jennifer		ID	990	1	General Changes to Regulations	My expectations of the management of these critically endangered lands includes: + Forbidding destruction of native vegetation to increase forage for livestock; + Including water quality monitoring as part of the land health evaluations; + Requiring the use of up-to-date best science practices for livestock grazing; + Requiring grazing management to maintain and improve special values of lands grazed; + Honestly evaluating the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions; + Ensuing that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods: + Including an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit; + Setting fair and equitable grazing fees based on comparable private land prices.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	4	General Changes to Regulations	MWGA's membership strongly supports revision to crossing authorizations. A number of MWGA's members presently trail sheep to their BLM allotments and crossing is an essential operational activity for those livestock grazing operations. However, this trailing activity requires, incredibly, the same level of administrative paperwork required of a 10-year grazing permit or lease, which makes no sense from a policy perspective. Sheep trailing has little or no environmental impact and certainly is not a major federal action for purposes of NEPA application. Therefore, it makes no sense to require that such trailing authorizations go through a Proposed Decision and protest period like renewals do. This unnecessary and burdensome process interferes with the ability of both the permittees and the agency to be immediately responsive to on-the-ground management. The BLM should take advantage of the present grazing revision proposal to reduce permit renewal processing for livestock crossings by eliminating the Proposed Decision requirement;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	1	General Changes to Regulations	MWGA supports provisions that call for the continued use of sheep for targeted grazing purposes, i.e. noxious weed control. Science proves that sheep are an effective management tool for noxious weed control and for fuel reduction on public lands. To this end, MWGA urges the BLM to authorize more targeted grazing on all BLM-administered public lands located in Montana;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	2	General Changes to Regulations	MWGA supports eliminating the requirement that a Proposed Decision and a protest period be issued prior to approving a grazing permit and/or lease renewal. The current process of requiring a proposed decision and protest period needlessly adds time to a basic decision-making process, and interferes needlessly with the timely and efficient renewal of existing leases and permits;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	19	General Changes to Regulations	Montana's sheep industry has concerns that the existing 'advisory councils' do not have the requisite expertise in specific rangeland health standards or other duties assigned to them during the Rangeland Reform of 1994 era. MWGA's membership requests that the reference to 'advisory councils' be struck from the grazing Regulations completely;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry and Diane		MT	960	3	General Changes to Regulations	Montana RMP's have proposed changing a .7 yearling percentage to equal a full AUM. This 30% loss of AUM's is significant to a ranch's bottom line plus some allotment pastures can achieve better management with the use of yearling grazing. We believe this needs to be changed back.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Godwin	Nadine		NY	421	4	General Changes to Regulations	Make it a rule that grazing management must improve carbon sequestration in soils and analyze all grazing permits in the context of a threatening climate catastrophe. • Similarly, ensure grazing management preserves the habitat of grazed lands for native plant and wildlife species, including predators. • In particular, ensure environmental analyses carefully consider the habitat of species in crisis and the broader extinction crisis we are seeing today — and that threatens to become a lot worse. • And, finally, when any grazing permit is granted, charge market rate grazing fees.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon D.	Cripple Cowboy Cow Outfit, Inc.	CO	1250	5	General Changes to Regulations	Make better use of Section 4 permits; The regulations need to return to the use of section 4 permits, instead of requiring cooperative agreements. More would get done if permittees had ownership of the improvement. Our ranch has a multitude of projects BLM is just sitting on, some for 10 years or more, but we will not try to do them ourselves because of the ownership factor.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dowell	Samuel		OR	750	4	General Changes to Regulations	Local Input -Permittees should have a greater role in the management planning process. Often times regulations are made with no input from permittees and only follow the wishes of special interests.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Correll	Leanne	SER Conservation District	WY	1066	5	General Changes to Regulations	Livestock grazing management is prescribed at the grazing permit, allotment, and pasture level. Stocking rates and densities, grazing seasons, and rotations are all prescribed at these more localized scales, not at watershed or landscape scales. Watershed and landscape level evaluations should not be used to determine if allotment and pasture level management practices should be continued or modified. To do so puts good grazing managers at risk of being forced to change their management practices as a result of their neighbors less successful practices and allows other poor grazing managers to continue their subpar practices as a result of their neighbors more successful practices. The process of how the BLM can look to watershed or landscape evaluation of land health to achieve coordinated management across allotment boundaries must be administered with flexibility and adaptive management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burke	Tammy			1375	1	General Changes to Regulations	Land set aside for nonuse is often at the detriment of many. AS we have witnessed, catastrophic fires continue to destroy our public lands. Many studies support the rational position that the nonuse of public lands for grazing has a direct connection to the amount of fires, the intensity of fires and the enormous cost to taxpayers to fight these fires
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry and Diane		MT	960	8	General Changes to Regulations	Land managers for agencies in Montana (state, Forest Service, BLM, reserves, and others) have agreed and signed on to a common protocol for range monitoring. This could add some stability for goals and management across landscapes as well as stability for permittees/lessees. If everyone is using the same basic methods to collect monitoring information while addressing individual situations and ecosite composition to evaluate land health across land ownership boundaries would add efficiency and constancy.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilkins	Cody		UT	725	1	General Changes to Regulations	It would be nice if the BLM would work with the Grazers on their on and off dates instead of having the on and off dates set in stone. example if we have an early spring and the cheat grass comes early. we can put the livestooock on early to help mitagate fire hazards.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	18	General Changes to Regulations	It will be very important to define in the regulations what constitutes the "side boards" for outcome-based grazing. Depending on the year and climatic conditions, grazing may likely not be the same timeframe or same practices each year. The regulations should outline clear methodologies so BLM, ranchers, and others have certainty and be "on the same page" about when grazing would occur, and how, in any given year.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	17	General Changes to Regulations	It will be very important to define in the regulations what constitutes the "side boards" for outcome-based grazing. Depending on the year and climatic conditions, grazing may likely not be the same timeframe or same practices each year. The regulations should outline clear methodologies so BLM, ranchers, and others have certainty and be "on the same page" about when grazing would occur, and how, in any given year.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	BURTON	DAVID	BURTON LAND & LIVESTOCK	UT	979	1	General Changes to Regulations	IT IS THE PERMITY WHO HELPS WITH THE MANAGEMENT OF THE LAND, ALLOW US TO HELP. LAST THING WE NEED TO BE ABLE TO MAKE DESISIONS TIMELY NOT YEARS LATER WITH IN REASON & SEASON. 1) CONVERSION / SHEEP TO COWS ECT.../ WHAT IS IN THE BEST INTEREST OF THE PERMITY DUE TO LOCAL ECONIMY WHICH THE MARKET PLAYS A BIG ROLL IN DAY TO DAY & WHAT IS IN TEH BEST INTEREST FOR THE LAND. 2) MAINTAIN / ADD WATER DEVELOPMENTS 3) MAINTAIN / ADD FENCES / CATTLE GAURDS 4) VEG TREATMEANTS 5) MAINTAIN ROADS 6)MAINTAIN / ADD CORRALS * NOTE ALL THESE ARE JUST A FEW TO HELP WITH LAND MANagements, THAT WILL HELP THE PERMITY, LAND, WILDLIFE BE SUCCESSFUL.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	20	General Changes to Regulations	It is crucial for the regulations to mandate reliance on current rangeland science and the scientific recognition that many ecological sites have an ecological potential that is no longer able to meet pre-settlement "reference state." An understanding and description of the ecological shifts or transitions that have occurred due to disturbance, such as wildfire, or legacy management are imperative in order to frame management objectives under any grazing permit. Ecological Site Descriptions (ESD) and their associated State and Transition Models/Disturbance Response Groups should be relied on, when they are available, to inform objectives and differing levels of grazing allowed. Depending on the given state of any ecological state, grazing influences the site dynamics in different ways. Any given ecological site has a range of "potential" states (i.e., vegetation characteristics) based on climatic conditions, past and present disturbance, and other field conditions. Each ecological site has multiple states it can exhibit. An understanding and description of the ecological shifts or transitions that have occurred due to legacy management are imperative in order to frame management objectives under a grazing permit renewal or any other grazing decision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Southwick	Jess	Prescott Land and Livestock	ID	1392	3	General Changes to Regulations	Increase/Decrease AUM's depending on yearly conditions in regards to weather, fire, voles.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hart	Charles	Society for Range Management	CO	1076	1	General Changes to Regulations	Increase flexibility in the implementation of grazing permits: Grazing permits set parameters for lessee's that, once established, can be difficult to change. The permit is based on data and conditions occurring at a specific point in time. SRM encourages building flexibility into the completed permit to recognize that fluctuation of forage production occurs naturally as a result of weather patterns, wildfire, invasive species, or other unforeseen events. The agreed to permit might incorporate ranges of AUM's grazing dates, livestock species, etc.; that could achieve the objectives defined in the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heard	Tom		TX	969	6	General Changes to Regulations	Include water quality monitoring as part of the land health evaluations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heard	Tom		TX	969	7	General Changes to Regulations	Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Tammy			1137	1	General Changes to Regulations	In the Great Basin where annual grasses dominate some areas, create an annual grassland designation to be managed similar to the ephemeral grasslands in the desert southwest. Permittees with annual grasslands would be permitted to graze them to a prescription not encumbered by a grazing preference.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Swasey	Amber	Mesa County	CO	822	4	General Changes to Regulations	In the case of conflicting livestock grazing applications, allowing or disallowing public ingress or egress across private property should not be a factor of approval or disapproval of an application.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Collett	Brian		ID	1005	1	General Changes to Regulations	In order to properly manage a dynamic system such as grazing lands, flexibility is critical. Improvements to grazing regulations should allow for greater flexibility in AUM numbers and season of use. This will allow for better management based upon current conditions each year.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Ruby			1176	1	General Changes to Regulations	In order to modernize regulations, it would be beneficial to the landscape to allow for resource and area based grazing plans. Annual review of the resource and proposed grazing should be based on specific permits and areas and not a one size fits all approach. Results based options would be more beneficial to the landscape than trying to develop one plan to suit all areas. Allow for flexibility, based on the resource, throughout the year to better manage for fire fuel load and cheat grass invasion.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Small	Sue		NM	995	2	General Changes to Regulations	In order to make grazing management more efficient, to stabilize a permittee's income, and to maintain the proper functioning condition of the land, a 30 percent utilization rate should be instituted. Each allotment should be reviewed for proper functioning conditions every 5 years to ensure the land can continue offering ecological services. Retiring allotments and allowing non use of an allotment for 5 years must be include in these regulations. Once an allotment has been taken out of use, even if temporarily, it must remain so based on the initial scoence based reason for such action.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ball	Robert		CO	1083	5	General Changes to Regulations	In order to comply with a US Supreme Courts decision, the BLM grazing regulations must include the requirement that, in order to qualify for and hold a grazing permit, the applicant must own the kind of livestock that would be authorized by their grazing permit. If a non-qualified applicant owns base property they could lease the base to a qualified applicant, but they can never hold the BLM grazing permit in their name.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	10	General Changes to Regulations	In cases where unauthorized use is willful and results in excessive forage utilization levels or other significant impacts to natural resources located on public land, punitive fees and penalties commensurate with the resource damage sustained should be imposed to abate the willful unauthorized use, incentivize corrective actions, and fund restoration measures.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	13	General Changes to Regulations	In cases where unauthorized use is willful and results in excessive forage utilization levels or other significant impacts to natural resources located on public land, punitive fees and penalties commensurate with the resource damage sustained should be imposed to abate the willful unauthorized use, incentivize corrective actions, and fund restoration measures.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	11	General Changes to Regulations	In cases where unauthorized use is willful and results in excessive forage utilization levels or other significant impacts to natural resources located on public land, punitive fees and penalties commensurate with the resource damage sustained should be imposed to abate the willful unauthorized use, incentivize corrective actions, and fund restoration measures.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	7	General Changes to Regulations	In addition, MWGA's membership asserts that reform of incidental occurrences is sorely needed. Reform in the areas of reducing documentation requirements and in reducing the punitive nature of incidental, non-willful occurrences are key to maintaining and promoting public lands health and stewardship;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cofresi	Shirley		CA	28	1	General Changes to Regulations	Improving the current standards are crucial for keeping our wildlands and watersheds healthy. Forbidding destruction of native plants for livestock grazing, include water monitoring online for public use, disclose underlying indiginous land claims and address ALL environmental justice issues, not allowing grazing permits until after scientific impact studies are completed and allowing the public input using the best science available for livestock decisions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klingel	Jon		NM	846	3	General Changes to Regulations	If you are not assessing the vegetative condition (Land Health Standards) on an allotment prior to issuing or renewing a permit, then you are not managing grazing. If you aren't going to manage grazing on an allotment then the allotment should be closed to grazing. If conditions aren't good or excellent then livestock numbers need to be reduce or eliminated on the allotment. Grazing fees on public lands should be similar to fees on private lands. If the cost of administering an allotment is greater than the fees recovered, then the allotment needs to be retired.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klingel	Jon		NM	846	1	General Changes to Regulations	If vegetation conditions are less than "Good" on any allotment based on "Land Health Standards assessment", livestock numbers need to be reduced or eliminated on that allotment. Long-term non-use needs to be considered for conservation needs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	46	General Changes to Regulations	If the BLM entertains authorizing targeted grazing to reduce fuel loads and protect high quality habitat from wildfire, the agency must explain how targeted grazing interfaces with permitted perennial grazing authorizations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	47	General Changes to Regulations	If the BLM entertains authorizing targeted grazing to reduce fuel loads and protect high quality habitat from wildfire, the agency must explain how targeted grazing interfaces with permitted perennial grazing authorizations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Parks	William	Sunnyside Livestock Co, LLC	WY	1393	2	General Changes to Regulations	If public BLM lands are public and are interlocked with private lands and the public seeks to utilize BLM lands that have public only access they should be required to hold/purchase a Public Lands Stamp to offset costs of BLM/Lease holders for improvements easements, weeds, fire control, wildlife damage, and potential access to land locked CLM parcels to utilize said lands. Maybe make regional BLM access/utilization tags for recreationist who utilize public lands no different than a public/BLM lease holder! Needing a Crossing Authorizations to cross BLM, the public thinks they can access BLM free.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rose	Brent	Northwest Utah Grazing Advisory Board	UT	848	3	General Changes to Regulations	If an area is not seeded, or has cheatgrass, grazing should begin as soon as possible to suppress the cheatgrass. Sometimes areas with cheatgrass should be grazed in the fall after they burn to give planted species as much advantage as possible against cheatgrass. An automatic two grazing season deferral of grazing should not be the standard. These decisions should be decided on a site specific level.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Pearce	Benjamin	Pearce Trust	NM	937		General Changes to Regulations 5	I would like to see the BLM focus more on the following: 1) Spend more time discussing all action alternatives with grazing lessees, specifically lessees whose leases contain 50%-70% BLM. 2) Maintain a relationship with lessees and make contact yearly, not every 10 years when the grazing authorizations are renewed. The lack of communication puts extreme strain on the lessees when extreme measures are made between grazing authorizations. 3) Realize the financial reasons allotment lessees need to have year-to-year stability. 4) Work with allotment lessees to create drought/disaster plans to destock or restock during the grazing year. 5) Realize how changing federal grazing plans and strategies can cause a taking on nonfederal lands. 6) Realize that federal lands in each state are subject to that state's constitution and state statutes. The BLM is only a landowner and must obey the laws of the governing state.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dunten	William		OR	936		General Changes to Regulations 1	I would like to see the blm consider the weather and precip of the year on turnout dates and also let the permittee graze in the fall of the year if there is additional feed still available. The cows are the cheapest and best fire fighter available.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cape	TJ		MT	1173		General Changes to Regulations 2	I think it would be cost effective for BLM to offer the smaller isolated tracts for sale to the leasees for a REASONABLE price. Keep in mind those BLM lands are the least desirable areas and thus shouldn't be priced at the same rate as prime land. It has to be cost prohibitive for BLM to administer those small acerages.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Valentine	Sarah		CA	19		General Changes to Regulations 1	I support BLM in correcting its published regulations to conform with the 2006 court decisions and to improve them for the benefit of the myriad plants and animals that depend on these public lands and for non-extractive users. Any new regulations should: 1. Create no new categorical exclusions and expand use of EAs and EISs. 2. Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. 3. Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. 4. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. 5. Ensure grazing management does not impede grazed lands from serving as habitat for native predators. 6. Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. 7. Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. 8. Forbid destruction of native vegetation to increase forage for livestock. 9. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. 10. Include water quality monitoring as part of the land health evaluations. 11. Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. 12. Disclose underlying Indigenous land claims and address environmental justice issues. 13. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. 14. Require use of the best available science in livestock grazing decisions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ghormley	Randy			1356	2	General Changes to Regulations	I strongly encourage the BLM to retain the Decision and protest period for permit and lease transfers as described in this station talking points. If truly needed, adjust the time period to 10 years rather than the current 3 years. But maintain the public's opportunity to be informed by a signed decision and protest if it affects them. Again, this is consistent with the BLMs stated objectives of improving public input opportunities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	12	General Changes to Regulations	I recommend setting a tiered grazing fee, where those who demonstrate they fully maintain their improvements pay a lower fee, while those who do not maintain their improvements at all pay a higher fee. There could be some tiers set in the middle as well. With the additional money gathered from the higher range fees the BLM could hire employees or contractors who would then go out and fix up the range improvements so that they functioned adequately. Once an individual demonstrated they were once again doing their due diligence in maintaining their improvements, the BLM could lower their fee to the lower tier.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Darling	Chanse			1252	1	General Changes to Regulations	I feel that increased grazing in pastures with cheatgrass is the most plausible solution to decrease fire hazard and improve range condition.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fullmer	Hannah		CA	268	2	General Changes to Regulations	I encourage the BLM to focus on grazing management that truly preserves the health of habitat for native plant and animal species, and leaves room for native predators to exist. Water quality monitoring must also be a part of land health evaluations. Finally, all NEPA analyses must take into account the habitat of plants and animals in crises.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Caines	Philip	Caines Land & Livestock	WY	1496	5	General Changes to Regulations	I believe that the concept of Non-renewable Permits can be used to accomplish Targeted Grazing objectives. However, the process needs to be simple and short in terms of approval time in order to capture the advantages of target grazing. It does very little good to utilize targeted grazing to establish a fire break if the permitting process takes so long that it burns before the grazing takes place. A non-renewable permit to utilize AUM's not available under the renewable permit could be used for fire fuel breaks or vegetation management. However, most permittees have sized their operations to those AUM's authorized under the renewable permit and thus may not have livestock available to fill the non-renewable permit. Some consideration needs to be given to allow them to take in outside livestock on a temporary basis without undue burden on their existing operation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Buzzetti	Rachel			1151	1	General Changes to Regulations	I am ashamed at how cumbersome the process is for flexibility in managmeent to reduce fuel loads when needed. Please make positive changes to our regulations that will allow for the management to adapt when needed.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gaff	Mal		CA	249	1	General Changes to Regulations	Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beavers	Nancy		TN	201	5	General Changes to Regulations	honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Murphy	Jonathan		UT	743	1	General Changes to Regulations	Having set dates make for poor grazing practices. Animals need to be moved as grass is ready not as a calender date comes around. If we focus more on the grass and not on dates, the range will see continual improvement. Some years need to go on later as the grass is not ready. Other years animals need to go on earlier as it may be a warmer spring and the grass is ready sooner. The flexiblity applies to cheatgrass as this is a huge problems. If animals are not allowed on until after the cheatgrass has headed out, animals will not graze the cheatgrass. If animals graze the cheatgrass before it heads out it will aid in the control of cheatgrass.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoots	Marti			1213	2	General Changes to Regulations	Have consultation with Permittee and Range Specialists ; on sight inspections and response in a timely manner.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Southwick	Jess	Prescott Land and Livestock	ID	1392	2	General Changes to Regulations	Have adaptive rotation within allotments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yardley	Merrill		UT	884	8	General Changes to Regulations	Grazing regulations should provide enough flexibility in the short term as well as the long term to provide adequate protections from wildfire. Grazing should be incorporated into grazing regulations as a tool to combat fuel loads and prevent wildfire. Permitting grazing outside of the ordinary grazing practices and standards should be a listed categorical exclusion available to range conservationists to utilize on demand and with short notices as well as parts of long-term objectives. This is justified with the acknowledgement that catastrophic wildfires have far more negative impacts to all resources than alterations to grazing practices in any given time period.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Casey		NV	748	1	General Changes to Regulations	Grazing regulations should be grounded on the foundation of flexibility and adaptive management with a focus on outcome-based grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jensen	Butch		UT	732	1	General Changes to Regulations	Grazing regulations need to be updated because federal regulations should not stand in the way of grazing permit renewals, installation of range improvements, and other actions that enhance the value of public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Samp	Cecelia		IL	519	1	General Changes to Regulations	Grazing permits should be retired as they expire and no other public land should be opened for grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	6	General Changes to Regulations	Grazing permits are very rigid, but the needs on the range are variable. Adding flexibility to the permits would go a long way to help in the management of the Rangelands. Having said that, however, blanket flexibility statements were attempted in the 2006 grazing regulations, and were part of why those regulations were permanently enjoined. I believe the old regulations allowed season of use to fluctuate by 2 weeks, depending on climate, etc... I think a better approach this time will be to spell out the type of flexibility options that are available, and to require that when doing a permit renewal those flexibility options are discussed with the livestock operator and interested public, and any applicable ones are carried forward to be analyzed in the NEPA document. This will allow site specific analysis to support flexibility options, thereby reducing litigation risk associated with blanket flexibility rules.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rose	Brent	Northwest Utah Grazing Advisory Board	UT	848	8	General Changes to Regulations	Grazing permit renewals should be included as a Categorical Exclusion under the NEPA process. This will help to speed up the process and result in decreasing the cost it takes to administer an Environmental Assessment (EA). The NEPA process is already a lengthy and expensive process for all involved. Allowing for grazing permit renewals to be accomplished as a Categorical Exclusion will result in a faster NEPA process. This means that the BLM and permittees will be able to focus more on the actual care and management of the land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	18	General Changes to Regulations	Grazing must be recognized and adopted as a powerful tool to reduce fine fuels. We appreciate and support efforts to move forward with common-sense grazing methods that benefit the land, protect from catastrophic fire, and make sense for ranchers' bottom line.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	4	General Changes to Regulations	Given the relationship of the BLM, State Historic Preservation Officers, and Tribal Historic Preservation Officers under the National Historic Preservation Act (NHPA}, it is incumbent upon the BLM to identify a timely and thoughtful process where cultural assessments and archaeological studies are required under Section 106. The diverse management mission of the BLM requires they appropriately recognize not only the trust responsibility (associated with Tribal cultural sites) and the cultural value of sites that meet historic criteria, but also the value and associated benefits of permitted livestock grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Swasey	Amber	Mesa County	CO	822	5	General Changes to Regulations	Given the quantity and intensity of wildfires in the west, Mesa County believes it is important that BLM have the option of issuing free-use grazing permits for fuels reduction on public lands. Further, the temporary permit should be authorized under a Categorical Exclusion.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schuldt	Cheryl	North Blaine Co Coop State Grazing District	MT	957	5	General Changes to Regulations	Given that these fences are both perimeter and international boundaries it seems only logical that the United States and Canada should be responsible for the maintenance of fixing fence on boundary pastures.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	9	General Changes to Regulations	Further, MWGA's members supporting removing the term "conservation use" from the regulations;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Guild	Joseph			1208	4	General Changes to Regulations	Free use grazing permits for fuel load reduction should be analyzed and issued in an expedited manner in order to quickly respond to fine fuel load buildups as a result of particular seasonal changes on the landscape. An example would be wet spring conditions causing an excessive growth of invasive species such as downy brome which would be susceptible to fire starts along public rights of way. Prescriptive grazing to widen the fire break on both sides of the road utilizing a free use grazing permit authorizing such limited grazing by a categorical exclusion could result in minimizing some fire starts or stop fire spread caused by lightning away from the public right of way in selected areas. Recently, the BLM announced a multi-million-dollar effort to create firebreaks using mechanical and chemical techniques to create thousands of miles of breaks in fire prone areas. In strategic places much money could be saved by using bands of sheep and herds of cattle to create and maintain such fire breaks.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gooch	Scott and Kaila			1497	2	General Changes to Regulations	Flexibility. Every year is different. Sometimes a permit owners situation is different. Local BLM needs to be allowed to make quick, logical decisions to adjust for annual changes within a set of general guidelines. Currently, they seem addicted to exact dates and numbers.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hook	Theron			1286	1	General Changes to Regulations	Flexibility should be the main focus of these revisions to improve the resource as related to seasonal conditions and dealing with invasive species that change the landscape over time.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davis	Rod		ID	1221	1	General Changes to Regulations	Flexibility of when and where to use livestock to reduce cheat grass loading would benefit all concerned, less suppression costs, less air pollution from massive wild fires, less danger to private property and more safety for fire fighters.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schuldt	Cheryl	North Blaine Co Coop State Grazing District	MT	957	1	General Changes to Regulations	Flexibility might include the ability to modify the turn in and removal dates based on the current year's weather patterns and subsequent forage production. Along those same lines, flexibility might also encompass changes in stocking rates and grazing duration, incorporation of flash grazing invasive annuals and/or nuisance or noxious weeds. Utilizing different classes of livestock such as goats or sheep on cattle allotments may decrease undesirable species at a fraction of the cost of herbicide applications.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Simkins	Connie	N-4 State Grazing Board	NV	1410	9	General Changes to Regulations	flexibility is practiced as an ongoing function of private land management and should likewise be embraced by the BLM as a critical tool in land management. It is long overdue that BLM recognize the importance of flexibility and include it in Allotment Management Plans. Effective allotment monitoring provides the basis for changes to occur that require flexibility. Permittees cannot wait for timeconsuming EAs to occur before adjusting management to embrace factors that require change.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doverspike	Steven		OR	888	1	General Changes to Regulations	Flexibility is important so you can manage for weather. What if the turn out date on a permit says X date and there is a foot of snow on the ground? Wouldn't it be better to be flexible and turn out when the grass is growing? What if it is an early Spring and the grass has already taken off? It could be best management to turn out a little earlier to help keep fine fuels down for fire later in the season. Plus it would be a community benefit both economically and enviromentally.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dowell	Samuel		OR	750	1	General Changes to Regulations	Flexibility -The grazing regulations need to allow for more flexibility in grazing permits. Not only flexibility in AUM numbers but also in season of use. Permittees need to be able to adjust management based on changes in climate, availability of forage, and build ups of fire fuel.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	18	General Changes to Regulations	Finally, AWHC asks that the BLM provide a site-specific analysis of the economic impacts of grazing with every permit renewal, including a look at the money obtained through grazing fees compared to the costs of administering the related permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris			1188	8	General Changes to Regulations	Extend the term of each grazing permit from 10 to 20 years, thus allowing ranchers the surety to finance necessary range improvements such as fencing, water development, and additional livestock over more realistic and sustainable repayment periods

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Findling	Karl		OR	1135	2	General Changes to Regulations	Expediting grazing authorizations as "a tool to reduce wildfire" or to "improve rangeland conditions." There is no positive correlation in the scientific literature that suggests grazing can achieve either outcome, and a large body of evidence to the contrary. However, it's clear that BLM seeks to expedite these types of permits under the guise that it will benefit public lands. In fact, grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gill	Mark		OR	9	2	General Changes to Regulations	Expediting grazing authorizations as "a tool to reduce wildfire" or to "improve rangeland conditions." There is no positive correlation in the scientific literature that suggests grazing can achieve either outcome and a large body of evidence to the contrary, but it's clear that BLM seeks to expedite these types of permits under the guise that it will benefit public lands. In fact, grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cascade	Robyn	Great Old Broads for Wilderness; Northern San Juan chapter	CO	1102	1	General Changes to Regulations	Expediting grazing authorizations as "a tool to reduce wildfire" or to "improve rangeland conditions." Our members are active outdoor men and women and we witness the impacts of grazing on our public lands. No scientific evidence exists to indicate that grazing can achieve fire reduction or rangeland health. Moreover, scientific literature demonstrates that grazing promotes just the opposite since it has been shown that grazing leads to the increase of invasive annual grasses, a reduction in biodiversity and a tendancy toward larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	6	General Changes to Regulations	Even more puzzling to MWGA's membership is the requirement that nonrenewable authorizations are required to go through the Proposed Decision process and to be subject to a protest period. From a policy and logistics standpoint, the current regulations make no sense and should be revised so that ordinary range management techniques can be performed without undue delay. This change would lead to better vegetation treatment, fire prevention, and help with dealing immediately with changing environmental conditions, and climate fluctuations;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bocchino	J		NY	444	2	General Changes to Regulations	Ensuring grazing management will preserve the habitat value of grazed lands for native plant and wildlife species. Ensuring grazing management does not impede grazed lands from serving as habitat for native predators. Forbid destruction of native vegetation to increase forage for livestock. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spotts	Richard		UT	1235	10	General Changes to Regulations	Ensure that the Land Health Standards are honestly evaluated at least once a decade using peer-review scientific and quantifiable methods. * Include water quality monitoring as part of the land health evaluations. * Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. * Disclose underlying Indigenous land claims and address environmental justice issues. * Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heard	Tom		TX	969	5	General Changes to Regulations	Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hougham	Tom		IN	434	9	General Changes to Regulations	Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. Forbid destruction of native vegetation to increase forage for livestock. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bocchino	J		NY	444	5	General Changes to Regulations	Disclose underlying Indigenous land claims and address environmental justice issues. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions and set a fair and equitable grazing fee based on comparable private land prices
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hougham	Tom		IN	434	5	General Changes to Regulations	Disclose underlying Indigenous land claims and address environmental justice issues. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions. Set a fair and equitable grazing fee based on comparable private land prices
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	19	General Changes to Regulations	Crossing Authorizations: Crossing authorizations used to facilitate timely livestock movement to and from grazing allotments are beneficial to BLM' s land management goals and objectives, however they currently require the same processing workload as typical I O-year grazing permits or leases. This hinders the ability of the BLM and permittee to be responsive to changes in management needs. These authorizations are currently categorically excluded fi'OIn NEPA under certain conditions and most are administrative in nature, however, they require a Proposed Decision and protest period like renewals. Seize the opportunity for better management by granting BLM authority to reduce permit renewal processing workload and time by issuing decisions which are immediately effective.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Tammy			1137	9	General Changes to Regulations	Create a surcharge exception when the forage being made available is provided to another permittee to relieve the effects of drought, fire or other natural disasters.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	King	Jeanne		NV	1404	1	General Changes to Regulations	create a better avenue for the permittee to be allowed to participate in the management of the permit he or she owns. This should be done in partnership with the agents charged with managing the land in question. The people living on the land, making their living from it, should know how to best use it. They need that opportunity to be allowed in the decision making process as to how to use the allotments based on prior use, moisture received, water developed, etc. The permittees need a voice and the capacity to advocate decisions on season of use, numbers used, rotations used, methods of fire control, as well as predator control methods.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mihal	Dianne	Stone Cabin Ranch, LLC	NV	1089	2	General Changes to Regulations	Controlled Burns: Methods that control decadent forage as well as plant litter ie. dead cheatgrass is needed immediately after the catastrophic wildfires we have seen in the West. One alternative to controlled burns that may get out of control quickly with the current level of decadence and litter, would be to have dynamic grazing permits that allow agencies to introduce cattle grazing post fire, early in the growing seasons to reduce undesirable grass (cheatgrass) fuel areas. Many studies currently exist that controlled grazing in these areas reduces increased re-current fire risks and can promote perennial, desirable grass growth. The current approach of waiting 3 to 5 years after a burn to be grazed is promoting the more frequent fire cycles. This method could promote a scenario where controlled burns could be used in the future as a method to promote a functioning ecosystem. Controlled burns with the current fuel load and management limitations will more than likely promote the catastrophic fire cycles we are experiencing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Molt	Melodi			1127	2	General Changes to Regulations	Consider expanding the dates for grazing 2-3 weeks on either side of the permitted grazing seasons to be incorporated into the grazing regulation. The cattle can return again in the fall to reduce fuel loads to protect our land from wildfires. These situations need monitored by LOCAL range specialist. These individuals have been educated to do a job, let them do it.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yardley	Merrill		UT	884	9	General Changes to Regulations	Climax communities are not usually included in monitoring of grazing. This has been a mistake and allowed for the expansion of climax communities that are more fire prone. To alleviate this, climax community areas within an allotment should be monitored along side monitoring of grazing and be a component of overall rangeland health evaluations. This should aid range managers in managing the landscape for sustained yields and multiple use which naturally limits and retards extreme wildfire.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Back	Gary			1207	9	General Changes to Regulations	Class and kind of livestock should also be recognized as a tool for managing vegetation. 43 CFR Subpart 4100.0-5 recognizes that there are different classes and kinds of livestock. Each of the classes/kinds have different grazing preferences; some can be trained to feed on noxious weeds; and some are capable of browsing while others focus on herbaceous vegetation. The grazing permits/allotment management plans need to incorporate the flexibility in a timely to incorporate temporary use of different classes or kinds of livestock in an allotment to achieve desired rangeland health standards.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tomera	Dan	Lander County Public Land Use Advisory Planning Commission	NV	1405	1	General Changes to Regulations	Cheat grass should be recognized as an available forage to be consumed by livestock of permittees. Too often the rancher is not allowed to graze a fuel rich area because other monitored key species reach a trigger and the livestock are required to be moved. This leaves behind an area ripe to be burnt. Allowing targeted grazing would also help to eliminate these dangerous conditions. It is crucial that targeted grazing only be allowed by ranchers with an authorized permit and be within their area of use. Also a quick and effective initial attack on a new fire is greatly encouraged, as well as good coordination with local volunteers and ranchers.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Marketa		OH	244	1	General Changes to Regulations	Charge propried usage fees when grazing is granted, retire leases when in the best interest of habitat and don't overuse land for grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baker	Dave	Baker Ranches Inc.	NV	762	1	General Changes to Regulations	certainty should be increased by minimizing administrative delays in permit renewals and by adjusting non-grazing uses rather than grazing when it is appropriate. Second, flexibility should be improved by having the ability to adjust numbers and season of use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Skinner	Robert	Skinner Ranches, Inc	OR	1012	1	General Changes to Regulations	Certainly, Grazing Preference should be reestablished in the regs and should replace permitted use wherever it appears in the current version of the regs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Skinner	Robert	Skinner Ranches, Inc	OR	1012	2	General Changes to Regulations	CCC (Consultation, cooperation and coordination should return to its pre-Range Reform version).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	France	Tom	National Wildlife Federation		1237	11	General Changes to Regulations	Carbon Sequestration - in the face of the climate crisis, NWF requests that the proposed rule require that grazing management regulations includes increased carbon sequestration in soils
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Swasey	Amber	Mesa County	CO	822	3	General Changes to Regulations	BLM should not be obligated to impose an automatic decrease in an Animal Unit Month ("AUM") when making adverse rangeland health assessments under Section 4180.2(c) and/or making adverse land use plan objective determinations under Section 4100.0-8 or Section 4130.3-3. Mesa County believes before the authorized officer decreases active use because of an unacceptable level of use or exceeding carrying capacity, BLM should first be required to consider modifying management practices (e.g., rotation, duration, etc.) and not automatically reduce active AUMs. Reduction of active use AUMs should only occur: (1) after modification of management practices is first attempted as a solution; and (2) then if unsuccessful, active use AUMs will be reduced only in direct proportion to the quantity of inconsistent use. In the event the authorized officer ultimately decides a reduction to the AUMs is the only option, those AUMs should be converted to suspended use AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	15	General Changes to Regulations	BLM should not allow the conversion of livestock AUMs to wildlife.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	13	General Changes to Regulations	BLM should move the land health standards from the grazing regulations to the planning regulations so that land health applies and is required to be considered for all multiple uses. We have seen circumstances where grazing is often identified as a causal factor for rangelands not meeting standards because the rangeland health assessment is mandated under livestock grazing. This requires a change in grazing management as "easy picking" for restrictive actions that are usually undue or ineffective in actually addressing any rangeland health issue. Other uses of rangelands have impacts, sometimes severe, to rangeland health and should be held to the same standards as livestock grazing when being permitted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	22	General Changes to Regulations	BLM should incorporate management direction contained in MS-1730 into the grazing regulations. BLM should prioritize allotments where grazing has an established incompatibility with wildlife for NEPA analysis, and BLM should assess groups of allotments in a single action where those allotments collectively affect a single bighorn population. BLM should cease prolonging the precarious state of bighorn sheep as a species by acting upon what the agency, and scientists, have previously acknowledged.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	harker	christine		MO	338	2	General Changes to Regulations	BLM should consider practices that improve the land's ability to resist wildfire, and imprve the quality of water sources and riparian areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Collett	Brian		ID	1005	3	General Changes to Regulations	BLM should be required to quantify or determine carrying capacity before any reductions of AUMs can be considered.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon D.	Cripple Cowboy Cow Outfit, Inc.	CO	1250	2	General Changes to Regulations	BLM not taking care of the land. BLM by not keeping wild horse numbers at AML is failing to prevent range problems. The regulations should require adherence to the Appropriate Management Level for the Federal Government as the owners of said livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Skinner	Robert	Skinner Ranches, Inc	OR	1012	5	General Changes to Regulations	BLM needs to use more fuels reduction tools to get ahead of the fire threat. Targeted grazing has been talked about extensively - we live in a very fire prone area. Our BLM Range Con and Supervisory Range Con asked us to consider some targeted grazing to alleviate potential fire threat as well as remove undesirable annuals (medusa head rye, and cheat grass) through Targeted Grazing in the plant dormancy stage. Trying to accomplish a positive outcome for the land has been an exercise of frustration both at the BLM as well as the permittee level. We have (Skinner Ranches) have not been able to move through the NEPA process now for two years. BLM comes to our producer meetings and tells us they want to use targeted and off season grazing for fuels reduction - so far in our District we can't get through the NEPA. The authorized officer should be able to reduce fuel levels when a potential disaster is present with a Categorical Exclusion.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon D.	Cripple Cowboy Cow Outfit, Inc.	CO	1250	6	General Changes to Regulations	BLM must do or authorize many more range improvements in wild horse areas; Water projects, chaining, reseeding, and fire should all be used. However, Range Improvement Funds as they are part of our grazing fees, should not be used for Wild Horse projects unless it is also of direct benefit to domestic livestock, even then there should be extra funding found for the project as 50% of grazing fees go into the fund and horses contribute nothing to the fund. Congress in most instances should appropriate separate funding for wild horse range improvements as its own line item, or should require wild horse advocacy groups to fund the project. Wild horse only areas such as The Little Bookcliffs must always use another funding source than Range Improvement Funds.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	33	General Changes to Regulations	BLM must develop detailed methodologies for scientifically determining public land carrying capacity, capability, suitability and sustainability in relation to the imposition of grazing disturbance and stress
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	DeFriez	Chelsea		ID	983	1	General Changes to Regulations	BLM Grazing allows for the lands to not be a box of cheat grass waiting to burn. And if grazed in a sustainable way can actually help heal the land and give wildlife more of the right type of natural plants, instead of the weed and cheat grass that help no one and no animal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	909	6	General Changes to Regulations	BLM AO's make a variety of Decisions in the course of their responsibilities. Some are administrative and have little impact on the recipient. But many grazing decisions have significant economic impact on family ranches and these types of decisions deserve to be made on the basis of science-based monitoring data that will stand the test of scrutiny. We recommend that the BLM develop science-based technical criteria for the quantity and quality of data in monitoring programs used as appropriate for the various types of grazing decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1079	7	General Changes to Regulations	BLM AO's make a variety of Decisions in the course of their responsibilities. Some are administrative and have little impact on the recipient. But many grazing decisions have significant economic impact on family ranches and these types of decisions deserve to be made on the basis of science-based monitoring data that will stand the test of scrutiny. We recommend that the BLM develop science-based technical criteria for the quantity and quality of data in monitoring programs used as appropriate for the various types of grazing decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015	25	General Changes to Regulations	BLM also needs to recognize that other factors, such as wild horse damage, wildlife forage consumption, fire, or extended dry conditions are routinely responsible for adverse rangeland health determinations and occur irrespective of livestock grazing permitted use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	21	General Changes to Regulations	BLM also needs to determine that other causes such as wild horse damage, fire, or severe drought responsible for adverse rangeland health determinations. It must be determined that livestock grazing management practices are the reason for the problems.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carollo	Dominic	Harney County	OR	1045	2	General Changes to Regulations	BLM also mentions the very real need for including provisions allowing greater flexibility for using livestock and grazing practices to manage and reduce fuel loads and generally mitigate the dangers of severe wildfire. Harney County is at significant risk to devastating wildfire from late spring through the fall, as are many other rural communities throughout the American West. Grazing is one of the most efficient methods to mitigate fuel loads and fire danger. Accordingly, increasing the ability to employ this effective measure to reduce the chances for devastating wildfires is very important to Harney County.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rose	Brent	Northwest Utah Grazing Advisory Board	UT	848	10	General Changes to Regulations	Billing for permittees with less than 100 AUM's could be changed to only billing every 5 or 10 years.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yoder	Paul		NM	755	1	General Changes to Regulations	Big Ranching pressures federal regulators. The ensuing reduced regulation produces excessive annual cattle populations way beyond the real-time carrying capacity of grazing allotments. Many allotments have little to no grass diversity, heavily cropped (chomped) existing grasses, rampant erosion, and arroyo creation and magnification. ACTION: inspect (unannounced) each allotment at least 1) every 3 months during active grazing, and 2) 6 months before and after initiating grazing ACTION: reduce allotment area ACTION: limit grazing allotments to under 20 head. This makes more leases attainable by small ranchers. 20 is significant because it somewhat approximates maximum observed natural ruminant herds (i.e. - female -juvenile elk herds outside of elk aggregation periods). ACTION: make quarterly range assessments public
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yoder	Paul		NM	755	2	General Changes to Regulations	Big Ranching ignores regulations. ACTION: make the allottee responsible for fencing and road upkeep ACTION: make allotment leasing public & transparent ACTION: enforce grazing regulators ACTION: increase LE (law enforcement) ranger presence
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yoder	Paul		NM	755	7	General Changes to Regulations	Big Ranching greater than the land can carry harms the land and pushes ecologic collapse. Big Ranching demands that the land is pushed beyond its natural limits. There are sustainable ranching methods. Once regulations are made appropriate to today's level of pasture degradation, and once regulations are enforced, then the prevalence of greed-based ranching will drop, as it loses its rampant profitability. ACTION: withdraw overgrazed allotments from grazing until they recover from past harm. ACTION: increase LE inspections and regulation of inholders especially for illegal road creation outside the inholdings. ACTION: hold private inholders surrounded by BLM - as well as BLM supervisors - accountable for compliance with federal laws and regulations. ACTION: raise the well-below-market and so-called "welfare ranching" fees for BLM grazing up to the level of grazing fees on private lands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallwood	Lori	Big Horn County Commissioners	WY	1223	7	General Changes to Regulations	Big Horn County asks that BLM revise grazing regulations to allow for the use of grazing to reduce fuel loads and the risk of fire. For example, grazing in the spring and fall can reduce the amount of fuel loads, including cheatgrass, a highly combustible and prolific invasive plant. Additional flexibility to address the increasing risk of range fires could be achieved by adding fuel reduction to the list of circumstances under which a free-use grazing permit may be issued. Allowing permittees to access rangelands earlier or later in the year, when cheatgrass can be combatted using livestock grazing, is another tool.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ghormley	Randy			1356	3	General Changes to Regulations	Based on the examples provided, this could be a benefit where invasive species such as cheatgrass or crested wheatgrass might be reduced if done properly and monitoring and outcome data is shared with the public. Grazing for fuel breaks may also be beneficial as exceptions where human values might be at risk. However, the reduction in fine fuels from livestock grazing is also one of the primary causes of deviation from the natural disturbance regime in many lower to mid elevational ecosystem types in the western United States. The BLM should therefore include information in this station on how targeted grazing will influence the widespread effort to restore historic fire return intervals where possible on public lands in the west. In many cases, reducing fine fuels may not be desirable where historic fire regimes can be restored.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rose	Brent	Northwest Utah Grazing Advisory Board	UT	848	11	General Changes to Regulations	Base property requirements need to be simplified. Perhaps a self-certification by the permittee would simplify the process. The permittee has to be able to put their cows somewhere when not on federal land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Pigeon	Kristy		ID	39	1	General Changes to Regulations	AUM rates should be consistent with the rates found on private land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	909	3	General Changes to Regulations	At present, the BLM is held to no science-based standard with respect to the information that the “authorized officer” can use to make grazing decisions. Science-based data should be the basis for grazing decisions in the future.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1079	4	General Changes to Regulations	At present, the BLM is held to no science-based standard with respect to the information that the “authorized officer” can use to make grazing decisions. Science-based data should be the basis for grazing decisions in the future.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	31	General Changes to Regulations	At present, the BLM is held to no science-based standard with respect to the information that the "authorized officer" can use to make grazing decisions. Science-based data should be the basis for grazing decisions in the future.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marderosian	Ara	Sequoia Forestkeeper	CA	23	1	General Changes to Regulations	Any new regulations should: Create no new categorical exclusions and expand use of EAs and EISs. Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat for native predators. Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. Forbid destruction of native vegetation to increase forage for livestock. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations. Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. Disclose underlying Indigenous land claims and address environmental justice issues. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	581	6	General Changes to Regulations	Any new regulations should: Allow for grazing permit retirement and long-term non-use for conservation purposes

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chizmar	Ronald		PA	30	1	General Changes to Regulations	Any new regulations should: Create no new categorical exclusions and expand use of EAs and EISs. Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat for native predators. Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. Forbid destruction of native vegetation to increase forage for livestock. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations. Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. Disclose underlying Indigenous land claims and address environmental justice issues. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moss	Paul		MN	11	1	General Changes to Regulations	Any new regulations should do all of the following: 1) Create no new categorical exclusions and expand use of EAs and EISs. 2) Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. 3) Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. 4) Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species . 5) Ensure grazing management does not impede grazed lands from serving as habitat for native predators. 6) Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. 7) Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. 8) Forbid destruction of native vegetation to increase forage for livestock. 9) Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. 10) Include water quality monitoring as part of the land health evaluations. 11) Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. 12) Disclose underlying Indigenous land claims and address environmental justice issues. 13) Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. 14) Require use of the best available science in livestock grazing decision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mariluch	Angie			1212	2	General Changes to Regulations	Although cheat grass it is very palatable to cattle, it is most likely not the preferred forage, but it is here and it is here to stay unless billions are spent on seeding, therefore recognize cheat grass as so and include it in the stocking rate and utilization of our grazing allotments. Again, wildfires are turning vast amounts of rangeland into cheat grass burns.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	4	General Changes to Regulations	Allowing any citizen to have equal standing to ranchers in allotment decisions has created unnecessary hardships on permittees. Livestock grazing on BLM lands is a permitted activity and many of the permittees have huge financial investments in their operations. Most citizen's do not have any investment.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rose	Brent	Northwest Utah Grazing Advisory Board	UT	848	2	General Changes to Regulations	Allow more flexibility with on/off dates, especially in instances of targeted grazing to reduce the spread of invasive species, noxious weeds, for fuels breaks, etc. Discretion should be given to managers to work with permittees as conditions change. At least two weeks, and preferably one month of flexibility should be given outside of permitted dates. Conditions in the Western U.S. are especially variable, meaning May 1st one year is not likely to be the same as May 1st the next year. There are instances when there is still a foot of snow of the ground on the permittee's turnout date. There are also instances when the permittee's off-date for a BLM allotment is five days before the on-date for their adjacent Forest Service allotment. Flexibility needs to be given for on/off dates to address these issues.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fitzpatrick	Samuel			1240	1	General Changes to Regulations	Allow more flexibility in grazing schedules and stocking rates to deal with variable timing and productivity of grass fuels - especially in recovering post-fire areas. We have personally been affected my fire many times and have seen where a 2 year grazing rest period post-fire can sometimes be the most detrimental factor in recovery due to the tremendous amount of fuel that can then accumulate and substantially increase fire risk. We understand that recovery of burned areas, especially the reestablishment of perennial grasses, is absolutely crucial in the long-term health of that land - and so the carefully studied application of grazing at the proper time is an important component.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Agro	Joan		NY	415	1	General Changes to Regulations	Allow for grazing permit retirement and long-term non-use for conservation purposes.*Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis.*Include water quality monitoring as part of the land health evaluations.*Disclose underlying Indigenous land claims and address environmental justice issues.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Jared		WA	45	1	General Changes to Regulations	Allow for grazing permit retirement and long-term non-use for conservation purposes. Create no new categorical exclusions and expand use of EAs and EISs. Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat for native predators. Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. Forbid destruction of native vegetation to increase forage for livestock. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations. Include an accurate and site-specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. Disclose underlying Indigenous land claims and address environmental justice issues. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions. Set a fair and equitable grazing fee based on comparable private land prices
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	Deborah		WY	85	1	General Changes to Regulations	Allow for grazing permit retirement and long-term non-use for conservation purposes. Create no new categorical exclusions and expand use of EAs and EISs. Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat for native predators. Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. Forbid destruction of native vegetation to increase forage for livestock. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations. Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. Disclose underlying Indigenous land claims and address environmental justice issues. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions. Set a fair and equitable grazing fee based on comparable private land prices

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Friedmann	Michael		NY	241	1	General Changes to Regulations	Allow for grazing permit retirement and long-term non-use for conservation purposes. Create no new categorical exclusions and expand use of EAs and EISs. Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat for native predators. Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. Forbid destruction of native vegetation to increase forage for livestock. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations. Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. Disclose underlying Indigenous land claims and address environmental justice issues. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions. Set a fair and equitable grazing fee based on comparable private land prices
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	1	General Changes to Regulations	Allow for grazing permit retirement and long-term non-use for conservation purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	24	General Changes to Regulations	Affected interest- In the process of consultation, cooperation and coordination with the permittee, the public's interest is represented by the BLM. The involvement of others who are not directly affected is unnecessary and should not be part of the process. The involvement of "affected interests" in BLM grazing decisions should be limited to those who can prove an actual direct effect to themselves personally from the proposed action. To allow those who have no direct involvement to impact the decision making process at the allotment level serves no good purpose.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Tammy			1137	5	General Changes to Regulations	Adaptive and outcome-based management needs to be flexible and responsive to fire and changing range conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry and Diane		MT	960	7	General Changes to Regulations	Adaptable targeted grazing using timing, water placement, temporary electric fencing, herders, etc can benefit forage composition, wildfire control, wildlife, and ranchers on a case by case basis if flexibility is allowed. Once again, if BLM personnel were allowed more "boots on the ground" and less shuffling of paperwork and defense against frivolous litigation, it would be much more productive for land use/management.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Small	Sue		NM	995	3	General Changes to Regulations	Active monitoring must include collecting and publicly sharing base line data on allotments, then annually assessing, and publicly announcing land conditions and adapting and enforcing any changes needed to ensure land health.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Palmer	Tim	National Association of Conservation Districts	DC	965	3	General Changes to Regulations	A true outcome-based grazing approach should ultimately include the goals of flexibility outside of rigid permit dates and terms and conditions. The results on the ground - the outcomes, as discussed above - are what truly matter. Any new proposals on grazing regulations should continue to mirror the good work that BLM is already doing to ensure that these efforts apply to all BLM grazing allotments
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Glebs	JOHN		MO	448	6	General Changes to Regulations	[comment:448-6; 104.10]Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions.Forbid destruction of native vegetation to increase forage for livestock.Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods.Include water quality monitoring as part of the land health evaluations.[comment:448-7; 206.10]Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.Disclose underlying Indigenous land claims and address environmental justice issues.Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands.Require use of the best available science in livestock grazing decisions.Set a fair and equitable grazing fee based on comparable private land prices.[comment end]
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wasgatt	Ann		CA	334	1	General Changes to Regulations	[comment:334-1; 104.13]Forbid destruction of native vegetation to increase forage for livestock.Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods.Include water quality monitoring as part of the land health evaluations.Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.Disclose underlying Indigenous land claims and address environmental justice issues.Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands.Require use of the best available science in livestock grazing decisions.Set a fair and equitable grazing fee based on comparable private land prices[comment end]
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barton	Cathy		MD	317	1	General Changes to Regulations	[comment:317-1; 104.04, 104.13]I favor including water quality monitoring as part of the land health evaluations.I favor including an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.I favor disclosing underlying Indigenous land claims and addressing environmental justice issues.I favor requiring grazing management to maintain and improve wilderness characteristics and other special values of grazed lands.I favor requiring use of the best available science in livestock grazing decisions.I favor setting a fair and equitable grazing fee based on comparable private land prices.[comment end]

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marnell	Lorraine		NM	998	3	General Changes to Regulations	*Native species.* The word "native" has been placed in numerous locations, keeping in mind these are lands that belong to the nation, not to individual ranchers for their cattle. Planting or seeding of non-native species is prohibited except in rare cases where native plants cannot solve a specific problem.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	24	General Changes to Regulations	(Note: PLC and CCA suggest a return to the pre-Babbitt language in appropriate Sections of the Regs, and policy Instruction Memo's to all Field offices to accommodate many of the concerns expressed below.)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Roberts	Brad		NV	1426	4	General Changes to Regulations	(4) The listing of a species as endangered or threatened should result in compensation to the permit holder by the groups wanting the listing
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Roberts	Brad		NV	1426	3	General Changes to Regulations	(3) Excessive #'s of non-livestock should result in compensation to the permitt holder by those who want the higher #'s. Not by the BLM.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Roberts	Brad		NV	1426	2	General Changes to Regulations	(2) Planting of a species (such as elk) should result in the State Department of Wildlife paying for the AUMs used.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	6	General Changes to Regulations	"Objectives" by definition must be measurable. This definition will help insure that the development of measurable allotment objectives must include consultation, cooperation and coordination (CCC) with the permittees/lessees and include items of importance to the legal requirement that BLM actions/decisions must contribute to the sustainability of multiple uses and help stabilize each ranch and the livestock industry.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	21	General Changes to Regulations	"In what ways can livestock grazing be used to reduce wildfire risk and improve rangeland health?" o As previously discussed, targeted grazing is a tool that could be used to reduce wildfire risk and enhance suppression efforts when they are needed by reducing fuel loads and creating fuel breaks. o As previously discussed, livestock grazing management is a tool that can be used to address areas not achieving land health.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schultz	Nancy		UT	1495	1	General Changes to Regulations	"a tool to reduce wildfire" or to "improve rangeland conditions." -There is no positive correlation in the scientific literature that suggests grazing can achieve either outcome and a large body of evidence to the contrary. In fact, grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires and livestock grazing does not "improve rangeland conditions".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	14	General Changes to Regulations	Wildlife has a significant impact on forage conditions. While the states primarily manage wildlife populations on BLM lands the UCCA believes the BLM shall be required to notify wildlife management agencies when forage conditions can no longer support the number of wildlife and the number of permitted livestock AUMs on an allotment. When the number of livestock AUMs are reduced due to forage conditions the BLM should be required to ask the wildlife managing agencies to reduce the wildlife population until such time conditions are improved and numbers can be restored.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	23	General Changes to Regulations	When it comes to Part 4180, our group is in a quandary. We believe the entire section should be eliminated, however we understand that the NDAA 2014 language requires some measure of "range land health." Potentially the NDAA language should addressed. "Meeting Land Health Standards": For the purpose of BLM Grazing Regulations, the term "meeting land health standards" is defined as, the Authorized Officer has determined from quantitative monitoring that the federal rangelands being grazed by the applicant for the renewal of a grazing permit/lease is accomplishing allotment objectives or the AO has determined from monitoring data that there is a positive trend towards accomplishing allotment objectives as expressed in the Land Use Plan, AMP, or a functional equivalent of an AMP. Permit renewal permits/leases meeting this definition of land health standards shall be issued under a categorical exclusion under the NEPA as authorized by Section 3023 of Public Law 113-291."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	57	General Changes to Regulations	We support targeted grazing as a fine fuel management tool. The regulations will better facilitate use of this tool by incorporating the following changes: * The issuance of targeted grazing permits should be issued under programmatic NEPA (including this EIS) and site-specific applications categorically excluded from NEPA analysis. * Targeted grazing authorizations should be separate from regular grazing authorizations. That is, the Animal Unit Months (AUM) authorized by such permits should not count as or reduce the number of AUMs permitted under existing grazing preference or term permit. * Targeted grazing authorizations should not conflict with existing grazing preference or term permits. * BLM Instruction Memorandum No. 2018-109 provides direction so that targeted grazing authorizations can be issued and administered with the appropriate flexibility necessary to achieve the desired management objectives. * 43 CFR 4160 provides BLM with authority to issue decisions authorizing nonrenewable grazing permits in full force and effect.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	56	General Changes to Regulations	We support targeted grazing as a fine fuel management tool. The regulations will better facilitate use of this tool by incorporating the following changes: * The issuance of targeted grazing permits should be issued under programmatic NEPA (including this EIS) and site-specific applications categorically excluded from NEPA analysis. * Targeted grazing authorizations should be separate from regular grazing authorizations. That is, the Animal Unit Months (AUM) authorized by such permits should not count as or reduce the number of AUMs permitted under existing grazing preference or term permit. * Targeted grazing authorizations should not conflict with existing grazing preference or term permits. * BLM Instruction Memorandum No. 2018-109 provides direction so that targeted grazing authorizations can be issued and administered with the appropriate flexibility necessary to achieve the desired management objectives. * 43 CFR 4160 provides BLM with authority to issue decisions authorizing nonrenewable grazing permits in full force and effect.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Snyder	Phyllis		CO	964	3	General Changes to Regulations	We support outcome based grazing where it is practical and possible to graze areas that need fuels reductions as long as this does not eliminate the use of the permitted lands unless this is a one on one trade of locations and should not become permanent unless this is beneficial and agreeable to all parties. Outcome based grazing is certainly more acceptable than controlled burns which create poor grazing conditions and poor air quality issues.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Campbell	Marcia		WY	1111	2	General Changes to Regulations	We have requested help with water development during extreme drought conditions and again, a long wait. Our BLM representative finally received the permission to proceed and we appreciate that. No water found yet. We also feel there should be emergency water systems allowed in such situations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ranches	Grant	Grant Ranches	WY	1419	1	General Changes to Regulations	We have a permit in Sublette Co. WY. My biggest and only beef with this permit is that I think that the local BLM authorities should have more say in how the permit is run. The BLM expects us to turn our cows onto the BLM when it is often too early and the grass has not been able to get a good start yet. And then they want us to still come off on the come-off date. If we wait until the grass is ready it often leaves us with a very short season and we leave an over- abundance of nice tall grass. Very seldom is there even a bite high of grass when the turn out date comes. It would be a lot more sensible if the local authorities could give the permit holders a bit of leeway on when to come off with their cows. If the rancher was to wait until the grass had a good start and worked with his range consultant, the BLM should allow this and allow them to stay a bit longer. It seems like they could get a small lee-way anyway- like within a week or two on both ends. This way it could be determined by the range condition. This would make a lot more sense than having the dates written in stone with no consideration of what is going on with the range.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	20	General Changes to Regulations	We can find no language from Congress or Federal court that would support a BLM Regulation that includes an abrogation of a private property right, (control of public ingress or egress) as a consideration for receipt of a grazing permit or lease. We also feel that consideration of the previous business relationship between an applicant and another Federal agency or State agency should be considered double jeopardy and disallowed as a criterion for receipt of a permit or lease.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	17	General Changes to Regulations	We are very supportive of the movement towards Outcome Based Grazing. It allows flexibility to meet and respond to resource changes over time in a cooperative manner. We feel that this can create an integrated process for land management where the BLM and permittees are able to manage for rangeland health across the landscape as a whole, rather than being restricted by arbitrary boundaries. By allowing flexibility in on/off dates and stocking rates, the permittee can adapt management to on-ground conditions in real time, just as they do on their private lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miller	Brooke	United States Cattlemen's Association	DC	1004	3	General Changes to Regulations	USCA supports targeted grazing as a fine fuel management tool. The regulations will better facilitate use of this tool by incorporating the following changes: -The issuance of targeted grazing permits should be issued under programmatic NEPA (including this EIS) and site-specific applications categorically excluded from NEPA analysis. -Targeted grazing authorizations should be separate from regular grazing authorizations. That is, the Animal Unit Months (AUM) authorized by such permits should not reduce the number of AUMs permitted under existing grazing preference or term permit. -Targeted grazing authorizations should not conflict with existing grazing preference or term permits. -BLM Instruction Memorandum No. 2018-109 provides direction so that targeted grazing authorizations can be issued and administered with the appropriate flexibility necessary to achieve the desired management objectives. - 43 CFR 4160 provides BLM with authority to issue decisions authorizing nonrenewable grazing permits in full force and effect.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mobley	Tom	Sierra Alta Ranch	NM	1385	1	General Changes to Regulations	The time and cost of renewing grazing permits would be reduced substantially if grazing permits issued, following completion of an initial NEPA compliance report, were issued for an indefinite period of time to continue until such time as there is a change in the ownership of base properties related to the grazing allotment for which the grazing permit is issued. The time and money saved by such change would enable more frequent assessment of rangeland conditions which might indicate, in a timely manner, opportunities for enhancement of natural resources. Inclusion of permittees in studies and decisions would further enhance the benefits due to the continuing stewardship and oversight of the partnering rancher. Current regulations currently authorize permit cancelation or modification at any time for specified reasons. That should negate the need for repetitive NEPA assessments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ogden	Garth "Tooter"	Sevier County	UT	1499	6	General Changes to Regulations	The BLM's grazing regulations should be updated to better accommodate rotational grazing (also known as deferred grazing, rest-rotation grazing, and other terms). Rotational grazing significantly benefits rangeland health livestock and has successfully been implemented on a large scale at several sites in Utah.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Blackburn	Dennis	Wayne County Commission		1363	1	General Changes to Regulations	The BLM should consider providing livestock producers with greater flexibility regarding on-off dates on BLM grazing allotments. The ability for a livestock producer to enter a grazing allotment early if conditions allow, or to stay on the allotment beyond the "off date" if sufficient forage is available, would considerably enhance livestock grazing operations on BLM lands. When favorable weather conditions produce more forage than expected, livestock producers should be afforded the opportunity to benefit from these conditions. Flexible on and off dates during favorable years would mitigate the negative impacts suffered by livestock producers during drought years. Over time this flexibility to adapt to variable weather conditions would bring more stability to ranching operations and local economies. The BLM's regulations should be revised so that the annual operating agreements of livestock producers include an option for flexible on-off dates as conditions allow.

Appendix C- Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lyons	Scott	Box Elder County Commission		1140		1 General Changes to Regulations	The BLM should consider providing livestock producers with greater flexibility regarding on-off dates on BLM grazing allotments. The ability for a livestock producer to enter a grazing allotment early if conditions allow, or to stay on the allotment beyond the "off date" if sufficient forage is available, would considerably enhance livestock grazing operations on BLM lands. When favorable weather conditions produce more forage than expected, livestock producers should be afforded the opportunity to benefit from these conditions. Flexible on and off dates during favorable years would mitigate the negative impacts suffered by livestock producers during drought years. Over time this flexibility to adapt to variable weather conditions would bring more stability to ranching operations and local economies. The BLM's regulations should be revised so that the annual operating agreements of livestock producers include an option for flexible on-off dates as conditions allow.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Raymond	Brian	Daggett County Commission		1142		1 General Changes to Regulations	The BLM should consider providing livestock producers with greater flexibility regarding on-off dates on BLM grazing allotments. The ability for a livestock producer to enter a grazing allotment early if conditions allow, or to stay on the allotment beyond the "off date" if sufficient forage is available, would considerably enhance livestock grazing operations on BLM lands. When favorable weather conditions produce more forage than expected, livestock producers should be afforded the opportunity to benefit from these conditions. Flexible on and off dates during favorable years would mitigate the negative impacts suffered by livestock producers during drought years. Over time this flexibility to adapt to variable weather conditions would bring more stability to ranching operations and local economies. The BLM's regulations should be revised so that the annual operating agreements of livestock producers include an option for flexible on-off dates as conditions allow.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rosquist	Amy	Six County Association of Governments	UT	1170		1 General Changes to Regulations	The BLM should consider providing livestock producers with greater flexibility regarding on-off dates on BLM grazing allotments. The ability for a livestock producer to enter a grazing allotment early if conditions allow, or to stay on the allotment beyond the "off date" if sufficient forage is available, would considerably enhance livestock grazing operations on BLM lands. When favorable weather conditions produce more forage than expected, livestock producers should be afforded the opportunity to benefit from these conditions. Flexible on and off dates during favorable years would mitigate the negative impacts suffered by livestock producers during drought years. Over time this flexibility to adapt to variable weather conditions would bring more stability to ranching operations and local economies. The BLM's regulations should be revised so that the annual operating agreements of livestock producers include an option for flexible on-off dates as conditions allow.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	449		5 General Changes to Regulations	The BLM must comply with and continue to apply existing regulations to document violations and assess penalties for grazing trespass and overuse.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	449		6 General Changes to Regulations	The BLM must comply with and continue to apply existing regulations to document violations and assess penalties for grazing trespass and overuse.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	3	General Changes to Regulations	The BLM grazing regulations should be revised to provide for greater flexibility in grazing permits, both in AUM numbers and seasons of use, to enable more nimble management based on seasonal conditions, fuels buildup, and forage availability. Particularly in regard to fuels management and invasive species control, flexibility in managing livestock numbers can, and should, be utilized as an invaluable tool. Authorized grazing on public lands has decreased steadily over the past several years, which has also coincided with increased fire prevalence in Idaho and down trending sage grouse populations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ingram	Jackie			1189	1	General Changes to Regulations	The BLM grazing regulations should be revised to provide for greater flexibility in grazing permits, both in AUM numbers and season of use, to enable more nimble management based on seasonal conditions, fuels buildup, and forage availability. Particularly in regard to fuels management and invasive species control, flexibility in managing livestock numbers can, and should, be utilized as an invaluable tool.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gammett	Glenda		OR	1382	9	General Changes to Regulations	-Temporary non-renewable should be at the discretion of the field office manager as a tool to manage for grazing to utilize feed, assist in fuel load reduction, and maintain healthy rangelands. -Season of use should be expanded on permits to allow managers and permittees to make decisions based on the range, annual conditions, benefits to the range, etc. i.e. if a permit has a season of use written in from March 1 to February 28 it is a tool that can be used to make good decisions on the allotment. AUMs and permit terms and conditions restrict this being an annual permit, but the dates allow decisions to be made based on the forage, range conditions and such for that particular year allowing for better management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Shephard	Ed	Public Lands Foundation		1128	3	General Changes to Regulations	Targeted Grazing Using livestock grazing as a tool in fire control and in other vegetation management plans is a good idea. The EIS should provide for this new tool including the possible contracting of a livestock operator to perform the needed grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	4	General Changes to Regulations	Targeted grazing should be used in the place of controlled burns, or for small fuel load reductions. Grazing is less invasive and destructive to the overall landscape, free-use grazing permits for fuel reduction should be added to the list as a tool to reduce fuel on public land. Cattle have been used in Colorado for brush control and eventually incorporated into permits later and should continue to be pursued as an option.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	BRYANT	ELIZABETH		ID	16	3	General Changes to Regulations	Streamlining protests and appeals - This is likely a reference to a desire by the agencies to reduce timelines for public involvement, increase or codify exhaustion requirements, and to further limit opportunities for the public to be informed about and participate in . Removing the requirement to assess Land Health Standards on every allotment - The regulations say that the new regs will consider "where and how the BLM will evaluate the Land Health Fundamentals and Standards." The agency is currently required to complete these as part of the permit renewal process. The agency has also been failing to meet Land Health Standards on many, many public lands allotments throughout the west. Instead of meeting the standards, it appears BLM plans to lower the bar of having to meet them. Expanding the use of categorical exclusions – i.e. completing fewer full and fair environmental analyses – and undermining public participation opportunities in the process.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Slaughter	Kathy		CO	655	2	General Changes to Regulations	Shortened timelines for public involvement takes away this safeguard of opportunities for the public to be informed about and participate in the process of deciding the best practices for managing grassland. Completing fewer full and environmental analyses using reasonable processes will further undermine public participation opportunities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sparks	Tom		MT	1110	3	General Changes to Regulations	Science- based rangeland practices have established a cow/calf pair as one (1) AU forage usage for a month. Yearlings should be counted as .7 AUs when calculating carrying capacity or when billing is based on AUs
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dal Vera	Anne		CO	1064	2	General Changes to Regulations	Review of allotment health conditions at least every ten years. Native species. The word “native” has been placed in numerous locations, keeping in mind these are lands that belong to the nation, not to individual ranchers for their cattle. Planting or seeding of non-native species is prohibited except in rare cases where native plants cannot solve a specific problem. Public accountability. The alternative requires public input, response to public concerns, and reporting of outcomes, all for accountability to the public about consequences of grazing Monitoring thresholds. The triggering of a change of course (adaptive management) depends on both quantitative thresholds that require changes in an activity when crossed, and monitoring to detect whether thresholds have been crossed. Predator control. Non-lethal only. Permittees waiting on the edges. Deletes current regulations that allow permittees to use allotments temporarily that for approved reasons aren’t being used by the current permittee.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Shephard	Ed	Public Lands Foundation		1128	8	General Changes to Regulations	Retirement of grazing privileges There has been a lot of dialogue regarding the purchases of ranches and associated grazing permits by 3rd parties wanting to retire the grazing privileges to protect other sensitive resource values on those public lands. The grazing regulations should more clearly respond to those procedures including clear procedures to deny other permittees actions to use areas that have been retired.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smetaniuk	Mari		NY	455	11	General Changes to Regulations	Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions. Set a fair and equitable grazing fee based on comparable private land prices
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Callahan	Ellen		ME	425	4	General Changes to Regulations	Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lanskey	Marcus		CO	472	2	General Changes to Regulations	Require grazing management to improve carbon sequestration and soil conservation Ensure grazing management preserves habitat for native plants and wildlife, especially predators Forbid destruction of native vegetation to improve forage for livestockInclude water quality monitoring
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	ST AUGUST	PATRICIA		WA	14	4	General Changes to Regulations	Removing the requirement to assess Land Health Standards on every allotment – The regulations say that the new regs will consider “where and how the BLM will evaluate the Land Health Fundamentals and Standards.” The agency is currently required to complete these as part of the permit renewal process. The agency has also been failing to meet Land Health Standards on many, many public lands allotments throughout the west. Instead of meeting the standards, it appears BLM plans to lower the bar of having to meet them.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Shephard	Ed	Public Lands Foundation		1128	2	General Changes to Regulations	Outcome based Grazing This is an experimental demonstration project less than two years in operation and it is too early to become a standard practice. However, the regulations could cover these demonstrations for testing purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reukauf	Lon	Cherry Creek Ranch	MT	1117	4	General Changes to Regulations	Our grazing allotments have an abundance of ungrazed vegetation that contributes to high fuel loads and uncontrollable hot fires. If a strategic designated heavily grazed area were present in 10 or 15% of an area as a firebreak, Wildfires would be easier to keep small. The heavily grazed area would have to be moved every year to maintain grassland health but would be very useful in keeping fires under control.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Maryboy	Kenneth	San Juan County Commission	UT	1427	5	General Changes to Regulations	Other opportunities for modifications of the regulations likely exist. San Juan County would support sensible modifications to the regulations that would allow timely response to changing range conditions and improve efficiency in decision making.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	18	General Changes to Regulations	Nonrenewable authorizations should be used to address resource concerns, treatments, etc. These actions require Proposed Decision and protest period like renewals which can delay use and negate the benefits of such use. BLM should take thi s opportunity to reduce permit renewal processing workload and time by issuing decisions that are immediately effective.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dieterich	Michele		MT	235	5	General Changes to Regulations	Native predators should not be unduly removed just because they come across a permitted area. If no conflict mitigation efforts are in place, the predators should be given a pass and compensation should be greatly reduced. Evaluate all allotments for their contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. No destruction of native vegetation should be allowed to increase livestock forage. Natural processes should be left in place. Make sure the health of the land is evaluated on a regular basis say every ten years and put to peer reviewed scientific methods. Water quality should be evaluated regularly The wildness of grazed lands should not be sacrificed. This is public land in the care of livestock growers and gov agencies Consider charging what a livestock grower would pay on private land for grazing. The going rate should be charged.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Palmer	Tim	National Association of Conservation Districts	DC	965	2	General Changes to Regulations	NACD is also supportive of BLM's focus on outcome-based grazing through demonstration projects, which aim to provide permit holders greater flexibility to respond to conditions on the ground while still ultimately meeting land health standards. The updated grazing regulations should memorialize this approach so that BLM can more broadly authorize grazing based on outcomes and expand from the demonstration phase.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vincent	Randan		UT	923	3	General Changes to Regulations	Many times there are issues receiving approval from the BLM to maintain infrastructure such as fences, water systems, roads and trails. Although the permittee has signed a maintenance agreement that requires them to maintain structure and they should not need permission they often receive push back from BLM in maintaining these structures. Also, when the access routes to these structures fall into disrepair the permission to repair these access routes is denied. So, while the BLM maintenance agreement requires the permittee to maintain the existing infrastructure the ability to maintain the access to these structures is denied. A possible solution would be to make the regulations clear that the permittee can maintain historic structures and the access to these structures.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lyons	Scott	Box Elder County Commission		1140	7	General Changes to Regulations	Livestock grazing can also be used as a tremendous tool to treat invasive species. Invasive plants in the western United States including cheatgrass, phragmites, and others have been successfully treated in defined areas through livestock grazing. Using livestock for invasive weed management is cost effective and has less of an impact than other weed management methods, such as the use of heavy equipment or chemical herbicides. Livestock producers also benefit from the use of additional feed provided by the invasive species. Invasive species are a growing problem on western range lands, and threaten the integrity of watersheds, wildlife habitat, and a variety of natural ecosystems. Livestock permittees should be utilized to combat these threats as true partners in range conservation and stewardship.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rosquist	Amy	Six County Association of Governments	UT	1170	6	General Changes to Regulations	Livestock grazing can also be used as a tremendous tool to treat invasive species. Invasive plants in the western United States including cheatgrass, phragmites, and others have been successfully treated in defined areas through livestock grazing. Using livestock for invasive weed management is cost effective and has less of an impact than other weed management methods, such as the use of heavy equipment or chemical herbicides. Livestock producers also benefit from the use of additional feed provided by the invasive species. Invasive species are a growing problem on western range lands, and threaten the integrity of watersheds, wildlife habitat, and a variety of natural ecosystems. Livestock permittees should be utilized to combat these threats as true partners in range conservation and stewardship.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Raymond	Brian	Daggett County Commission		1142		General Changes to Regulations 6	Livestock grazing can also be used as a tremendous tool to treat invasive species. Invasive plants in the western United States including cheatgrass, phragmites, and others have been successfully treated in defined areas through livestock grazing. Using livestock for invasive weed management is cost effective and has less of an impact than other weed management methods, such as the use of heavy equipment or chemical herbicides. Livestock producers also benefit from the use of additional feed provided by the invasive species. Invasive species are a growing problem on western range lands, and threaten the integrity of watersheds, wildlife habitat, and a variety of natural ecosystems. Livestock permittees should be utilized to combat these threats as true partners in range conservation and stewardship.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339		General Changes to Regulations 4	Large-scale actual restoration of public land native vegetation communities through use of fungal pathogens/bacterial controls for cheatgrass/bromes must be a high priority, and rehabbing lands with native species accompanied by removal of grazing to protect the investment in rehab must also be a accommodated in the grazing reg revision to grapple with ecological realities in 2020.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keerins	Joanne		OR	1164		General Changes to Regulations 1	Land health fundamental, standards and guidelines need to include wildlife, feral horses, fire and recreation use in the equation of what usage is on an allotment
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897		General Changes to Regulations 1	It was not totally clear from the Talking Points exactly what this would entail, but I'm assuming this would mean an individual would be able to pay for multiple years at a time with a single bill. I think this is an excellent idea, but it would require a change in how frequently the grazing fee is reevaluated. Since it's currently done every year, paying for grazing use multiple years into the future is not currently possible.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ackerman	Laura		WA	508		General Changes to Regulations 2	Indegenous rights and claims need to be made public
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tomera	Paul	Tomera Ranches	NV	784		General Changes to Regulations 1	In the last couple of years, the term "outcome-based grazing" has been used quite regularly. To be successful, permits need to be issued with some flexibility and adaptive management. Given the wide range of conditions from year to year in the West, a cookie-cutter approach can not be implemented. successfully. TNRs can be issued at the end of season, but the process has been abused by environmental groups, and at present cannot be considered a useful tool. A system that allows additional grazing if conditions warrant it needs to be put into effect. With the increasingly large acres of cheatgrass resulting from wildfire, targeted grazing needs to be used as a tool to help control the effects of a range fire.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	11	General Changes to Regulations	In analyzing its proposal to evaluate land health standards at the LUP level, the BLM must provide an accurate accounting of the age of current land use plans, projected (and realistic) revision dates, and how shifting land health evaluations to the LUP process would be accomplished.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hendrickson	Callie		CO	1116	2	General Changes to Regulations	In addition to the above information and policy, the Districts strongly encourage issuing permits for a period of twenty (20) years. This would allow BLM range staff to reduce the amount of office time and paperwork on permits by half which would allow them to engage in much more productive on-the-ground management and project implementation. With more time in the field, they could become more engaged with the people using the public lands and improve the resources as well as the image of BLM with the public.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Findling	Karl		OR	1135	2	General Changes to Regulations	<p>In a widely cited paper, by University of Arizona researchers who looked at targeted grazing as a fire reduction measure, they concluded that "targeted grazing" results only worked under "moderate" fire weather conditions. Under moderate fire weather conditions, it's relatively easy to stop or suppress a wildfire, so any advantages gained in fire suppression are marginal. Grazing won't prevent the large fires that burn tens or even hundreds of thousands of acres.</p> <p>https://www.sciencedirect.com/science/article/abs/pii/S155074241500144X?via%3Dihub BLM should consider:</p> <ol style="list-style-type: none">1. Except in the early spring, cheatgrass (<i>Bromus tectorum</i>), is not a preferred forage. As a result, livestock preferentially graze native perennial grasses and reduce their overall vigor, either directly eliminating them from the site, or decreasing their ability to compete against cheatgrass for nutrients and water. Native plants weakened by a blaze are particularly vulnerable to cheatgrass competition. This is why permitting cattle to graze burned sites a few years after a blaze (as commonly is practiced on BLM and FS allotments) is counterproductive, and only enhances cheatgrass spread.2. Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis.3. Ensure grazing management preserves the habitat value of grazed lands for native plants, fish and wildlife species.4. Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions.5. Forbid destruction of native vegetation to increase forage for livestock.6. Ensure that the Land Health Standards are evaluated at a minimum, once per decade, using peer-reviewed scientific and quantifiable methods and/or the BLM's own rangeland standards, as adopted by the states of Oregon, and Washington.7. A reasonable compromise needs to be found as an alternative that supports sportsmen, wildlife, and protections for wildlife habitat. Consider the elimination of non-native seedings in post-fire rehabilitation. Native seed mixes plus, discontinuation of Crested wheatgrass seedings where possible. Use of the Early Detection and Rapid Response (EDDR), a practice of actively conducting systematic detection surveys for invasive plants, and if detected, aggressively treating. Studies have shown a 34:1 cost-benefit for EDRR.8. Include water quality monitoring as part of the land health evaluations.9. Include an accurate and site-specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.10. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands.11. Require use of the best available

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	4	General Changes to Regulations	I was very pleased to see the changes Congress made to the FLPMA back in 2015, related to livestock trailing. I'm glad to hear the grazing regulations would be updated to help clarify this change. A common confusion among folks now relates to whether the BLM should issue Term Crossing Permits (good for say 10 years), or if a separate Crossing Permit should be issued each time an individual needs to trail. Clarifying this in the regulations would be helpful.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	kindel	karen		OH	240	1	General Changes to Regulations	I support the following. Allow for grazing permit retirement and long term non use for conservation. Greater levels of public engagement. Forbid destruction of native vegetation to increase forage for livestock Set a fair and equitable grazing fee Monitor water quality.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Zimmerman	Ted			1126	1	General Changes to Regulations	I strongly urge the Bureau of Land Management to adopt revisions to grazing laws that are flexible. If you build flexibility into the regulations then particular situations can be can be treated in ways that are the most helpful at a specific place and time. It is better not to have rules that are a one size fits all. I would also like to see the Bureau give more weight to the opinions and desires of the people who live near the areas in question.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reukauf	Lon	Cherry Creek Ranch	MT	1117	3	General Changes to Regulations	I have lived next to the Terry Badlands Wilderness Study area since 1960. This area was officially designated as a Wilderness Study area in 1976. Since then the amount of Invasive Species which consist of Leafy Spurge, Salt Cedar, and Spotted Knapweed have expanded and thrived. As a member of the Prairie County Weed Board we have abandoned weed control in the Wilderness Study Areas because the rules against spraying with wheeled vehicles makes spraying extremely time consuming and expensive. The BLM is tasked with an impossible job of controlling Invasive Noxious weeds in this area because of the Unworkable Regulations that govern activity in this Wilderness Study Area. The Invasive Noxious Weeds are now so numerous and profuse that chemical control may no longer be possible. This once productive pristine area has forever been changed because of well meaning well intentioned stupid neglect. The only recourse at this stage would be sheep and goat grazing and biological control in conjunction with chemical spraying, but this is impossible because stock water sites cannot be developed or even maintained under current wilderness policies of neglect. This is so sad. This area should be returned to normal multiple use and care as it would benefit everyone more. Enforced neglect is not healthy for this area.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barton	Cathy		MD	317	5	General Changes to Regulations	I favor including an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. I favor disclosing underlying Indigenous land claims and addressing environmental justice issues. I favor requiring grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. I favor requiring use of the best available science in livestock grazing decisions. I favor setting a fair and equitable grazing fee based on comparable private land prices.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dieterich	Michele		MT	650	7	General Changes to Regulations	I do think that you should allow for permanent grazing permit retirement and search for new ways to engage and involve the public in decision making and scientific surveys. I hope you evaluate land health standards at least every ten years and include water quality in the standards. I hope you will consider not destroying native species to increase forage and make sure that allotments don't impede the migration and survival of native predators. Please also use the best available science to evaluate the role of cheat grass and grazing on fire cycles. And finally, you should be charging the going rate for grazing, or better yet, charge enough that this is no longer a subsidy.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dieterich	Michele		MT	650	6	General Changes to Regulations	I am also confused as to why you would "informally" address unauthorized grazing. This is public land in the public trust and should be protected officially. I would suggest increasing fines, adding minimum jail sentences, and revoking grazing privileges. I am very concerned about the word "streamlining" when addressing protests and appeals. Are you trying to take the public voice out of the mix? The public owns these lands, not the agencies or the permittees. The public has a right to comment, and object to work and uses on public land. The public has a right to be informed and serve as a check and balance to agency work. It is messy sometimes, but it is necessary. NEPA is a strong and necessary law. It keeps lobbyists with lots of money in check when it comes to decision-making on public lands. Categorical Exclusions (CE)s should not be increased. These also take the public out of the mix in decision-making. CEs were meant for innocuous projects that have little or no impact on the environment. Grazing has huge impacts on the environment and greatly affects other uses. It has no business in a CE.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Palmer	Tim	National Association of Conservation Districts	DC	965	1	General Changes to Regulations	However, in some instances when increased forage and fuel loads occur, it can be difficult for a permit holder to access those acres through temporary non-renewable (TNR) permits in a timely manner. In many cases, the evidence of these excess fuels and forages are not apparent well in advance. When these conditions do exist, permit holders should be provided a flexible and clear process to ensure that livestock are able to quickly mitigate those fuel loads and take advantage of the excess forage. TNRs are issued directly in response to changing circumstances on the landscape, and flexibility in the application of these permits is needed to ensure resources are managed properly. The grazing regulation should develop a streamlined process with certainty built in to allow TNR, or a TNR-type process, to utilize excess forage when it is available and can be responsibly grazed. This would apply to annual grasses (e.g. cheatgrass) and both native grasses and non-native perennial grasses (e.g. crested wheatgrass).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Glebs	JOHN		MO	448	11	General Changes to Regulations	Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. Forbid destruction of native vegetation to increase forage for livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smetaniuk	Mari		NY	455	10	General Changes to Regulations	Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. Forbid destruction of native vegetation to increase forage for livestock. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	581	7	General Changes to Regulations	Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Holloway	Skylar	American Farm Bureau Federation	DC	1262	9	General Changes to Regulations	Grazing regulations should support a streamlined system which provides a workable process for the allocation and use of grazing forage, when it is available to be consumed, including in a timeframe that is outside of the current grazing permit dates, terms and conditions. The present approach of Temporary Non-Renewable (TNR) operating systems has failed to be workable with bureaucratic restrictions and decision processes that are not workable.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Holly	Wyoming Farm Bureau Federation		1218	16	General Changes to Regulations	Grazing Permit Renewals BLM's processing of grazing permit renewals is overly cumbersome, inefficient and prevents the BLM from focusing on range management activities and improvements. Thus, we propose that in addition to changing to 20-year permit renewal, categorical exemptions should be granted to any permit renewal with a less than 10 percent change. Also, once an allotment management plan has been approved, range improvements, within the scope of the plan, should be excluded from administrative appeals or further NEPA analysis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	9	General Changes to Regulations	Grazing decisions should be based on scientific data- Any stocking rate decisions should be based on monitoring data reflecting condition and trend over time. Precipitation and other factors that affect conditions during the growing season should also be measured and may be used as appropriate in the process. Short term utilization data is not sufficient to make long term stocking rate decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Denice	Lincoln County, NV		1177	3	General Changes to Regulations	Flexibility to allow for annual variations in forage production - We have to move away from the strict prescription of use to an outcome-based approach dependent on rangeland conditions. Flexibility for the permittee that allows for full use of the resource within the boundaries of set conditions. Adaptive management would be the key to this management style - requiring real monitoring and service by BLM staff.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Palmer	Tim	National Association of Conservation Districts	DC	965	4	General Changes to Regulations	Finally, we wish to remind BLM that conservation districts are local government entities, and in states where BLM grazing permits exist, they have the recognized and demonstrated special expertise to be a tremendous resource to BLM in managing landscapes and coordinating activities and rangeland improvements with the ranchers that hold grazing permits. The grazing regulations should ensure that coordination with local governments, including conservation districts, is bolstered and these local governments recognized as playing a role in proper management of public lands and relationship building with ranchers for consensus-based management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ranch	LeValley		CO	1084	3	General Changes to Regulations	Finally, suspended use AUM numbers need to remain with the permit and not be removed from the allotments. The suspended AUMs should be allowed to be applied for when forage conditions and monitoring show that adequate forage and management are present. This should be done by issuing an IM that directs BLM to not remove suspended AUMs from existing permits.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ackerman	Laura		WA	508	4	General Changes to Regulations	Fair grazing prices for the public landowners, not the grazers
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	alexandra	Kathryn		WA	654	5	General Changes to Regulations	Expediting grazing authorizations as “a tool to reduce wildfire” or to “improve rangeland conditions.” There is no positive correlation in the scientific literature that suggests grazing can achieve either outcome and a large body of evidence to the contrary
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hutter	Fairfax		NJ	1001	2	General Changes to Regulations	Expediting grazing authorizations as “a tool to reduce wildfire” or to “improve rangeland conditions.” There is no positive correlation in the scientific literature that suggests grazing can achieve either outcome and a large body of evidence to the contrary, but it’s clear that BLM seeks to expedite these types of permits under the guise that it will benefit public lands. In fact, grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	ST AUGUST	PATRICIA		WA	14	2	General Changes to Regulations	Expediting grazing authorizations as “a tool to reduce wildfire” or to “improve rangeland conditions.” There is no positive correlation in the scientific literature that suggests grazing can achieve either outcome and a large body of evidence to the contrary, but it’s clear that BLM seeks to expedite these types of permits under the guise that it will benefit public lands. In fact, grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Price	Donna		WI	859	2	General Changes to Regulations	Expediting grazing authorizations as “a tool to reduce wildfire” or to “improve rangeland conditions.” There is no positive correlation in the scientific literature that suggests grazing can achieve either outcome and a large body of evidence to the contrary, but it’s clear that BLM seeks to expedite these types of permits under the guise that it will benefit public lands. In fact, grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	BRYANT	ELIZABETH		ID	16	2	General Changes to Regulations	Expediting grazing authorizations as "a tool to reduce wildfire" or to "improve rangeland conditions." There is no positive correlation in the scientific literature that suggests grazing can achieve either outcome and a large body of evidence to the contrary, but it's clear that BLM seeks to expedite these types of permits under the guise that it will benefit public lands. In fact, grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	ST AUGUST	PATRICIA		WA	14	5	General Changes to Regulations	Expanding the use of categorical exclusions – i.e. completing fewer full and fair environmental analyses – and undermining public participation opportunities in the process.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wasgatt	Ann		CA	334	7	General Changes to Regulations	Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations. Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. Disclose underlying Indigenous land claims and address environmental justice issues. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions. Set a fair and equitable grazing fee based on comparable private land prices
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Glebs	JOHN		MO	448	3	General Changes to Regulations	Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat for native predators.Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smetaniuk	Mari		NY	455	3	General Changes to Regulations	Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat for native predators. Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Glebs	JOHN		MO	448	10	General Changes to Regulations	Disclose underlying Indigenous land claims and address environmental justice issues. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions. Set a fair and equitable grazing fee based on comparable private land prices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	581	9	General Changes to Regulations	Disclose underlying Indigenous land claims and address environmental justice issues.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lanskey	Marcus		CO	472	6	General Changes to Regulations	Disclose Indigeous land claims Require grazing management to maintain and improve wilderness characteristics Require the use of the best available science when granting livestock grazing permits Set fair and equitable grazing fee based on comparable private land prices
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dieterich	Michele		MT	235	4	General Changes to Regulations	Create the ability for the permanent retirement of allotments. Assure the habitat quality of allotments. They should be managed for all wildlife, not just permittees. Add improving carbon sequestration to soils as part of the analysis and requirements for permits.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	1	General Changes to Regulations	Coordination between on and off dates with BLM permits should be improved in the regulations to include advanced measurement systems that stem through a period of at least five years. These measuring protocols should also include accurate, up-to-date scientific data to support grazing sustainability. BLM grazing leases in many parts of Colorado are used as spring or summer pastures. USFS grazing is typically used in the winter time. Often times the ability to transfer livestock from one pasture to another does not align with anticipated dates of entry and exit creating a loss in time to best utilize available forages. Coordination between agencies to achieve the most optimal access should be a priority in new rules moving forward, allowing for better management of the resources.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tomera	Paul	Tomera Ranches	NV	784	2	General Changes to Regulations	Cheatgrass needs to be considered as available forage and managed as such. Targeted grazing can be used in areas that have been burned in the past to create fire breaks within cheatgrass monocultures.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	581	1	General Changes to Regulations	Changes to grazing regulations by the BLM should be done to improve the habitat, native vegetation, and water resources.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lyons	Scott	Box Elder County Commission		1140	5	General Changes to Regulations	Catastrophic wildfires are causing every greater damage on landscapes across the western United States. Overgrown vegetation leads to a dangerous buildup of combustible fuels. Livestock can play an important role in reducing dangerous fuel loads and therefore reducing the risk of catastrophic wildfires. Livestock producers, governmental agencies, the U.S. military, and other groups have successfully used livestock to create fuel breaks and reduce hazardous fuels in projects across the western United States. The BLM's grazing regulations should be updated to enhance the ability of BLM field offices to use livestock to create fuel breaks and reduce fuel loads. Such use of livestock should happen cooperatively with local governments, States, private landowners, fire departments, livestock producers, and other federal agencies.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rosquist	Amy	Six County Association of Governments	UT	1170	5	General Changes to Regulations	Catastrophic wildfires are causing every greater damage on landscapes across the western United States. Overgrown vegetation leads to a dangerous buildup of combustible fuels. Livestock can play an important role in reducing dangerous fuel loads and therefore reducing the risk of catastrophic wildfires. Livestock producers, governmental agencies, the U.S. military, and other groups have successfully used livestock to create fuel breaks and reduce hazardous fuels in projects across the western United States. The BLM's grazing regulations should be updated to enhance the ability of BLM field offices to use livestock to create fuel breaks and reduce fuel loads. Such use of livestock should happen cooperatively with local governments, States, private landowners, fire departments, livestock producers, and other federal agencies. Livestock grazing is a safe, sustainable, cost effective, and low impact method of hazardous fuels removal that, when used correctly, can have many advantages over other fuel-removal methods, such as mechanical treatments or prescribed burns. Livestock producers benefit when able to use their livestock to reduce hazardous fuels because forage that may otherwise go unused is utilized. The BLM should facilitate the use of livestock to reduce hazardous fuels in both rural areas and in the wildland-urban interface. Highly developed areas on the urban fringe are often the most susceptible to damage from catastrophic wildfires, and livestock can help protect the urban fringe with minimal visual or auditory impact on surrounding communities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Raymond	Brian	Daggett County Commission		1142	5	General Changes to Regulations	Catastrophic wildfires are causing ever greater damage on landscapes across the western United States. Overgrown vegetation leads to a dangerous buildup of combustible fuels. Livestock can play an important role in reducing dangerous fuel loads and therefore reducing the risk of catastrophic wildfires. Livestock producers, governmental agencies, the U.S. military, and other groups have successfully used livestock to create fuel breaks and reduce hazardous fuels in projects across the western United States. The BLM's grazing regulations should be updated to enhance the ability of BLM field offices to use livestock to create fuel breaks and reduce fuel loads. Such use of livestock should happen cooperatively with local governments, States, private landowners, fire departments, livestock producers, and other federal agencies. Livestock grazing is a safe, sustainable, cost effective, and low impact method of hazardous fuels removal that, when used correctly, can have many advantages over other fuel-removal methods, such as mechanical treatments or prescribed burns. Livestock producers benefit when able to use their livestock to reduce hazardous fuels because forage that may otherwise go unused is utilized. The BLM should facilitate the use of livestock to reduce hazardous fuels in both rural areas and in the wildland-urban interface. Highly developed areas on the urban fringe are often the most susceptible to damage from catastrophic wildfires, and livestock can help protect the urban fringe with minimal visual or auditory impact on surrounding communities.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baltzor	Catherine		OR	929		General Changes to Regulations	By only using a specific date for turning out on an allotment, domestic livestock can be turned out too late or too early without regard to natural resource health. In years past, local range cons at the BLM were allowed a two week period on each date of the allotment plan to determine when and how to use the resource. I propose this is reinstated at a minimum and would prefer 3-4 week latitude on each end of the allotment plan due to the variability in climate and weather in our high desert. When we have a wet spring and above average vegetation on the range or simply years of underutilization of vegetation, I would propose BLM offer off season grazing. However, permittees must have knowledge of this option long before late summer or fall, so they can adjust their grazing pastures to accommodate the off season use
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goetz	Katie	New Mexico Department of Agriculture		1115		General Changes to Regulations	BLM's current grazing regulation grants broad discretion to the authorized officer. This is evident throughout the grazing regulation, particularly in subparts concerning qualifications and preference; grazing management; and authorizing grazing use. NMDA has elected to point to the most salient examples in those subparts. § 4110.2-2 (a) Permitted livestock use shall be based upon the amount of forage available for livestock grazing as established in the land use plan, activity plan, or decision of the authorized officer under § 4110.3-3, except, in the case of designated ephemeral or annual rangelands, a land use plan or activity plan may alternatively prescribe vegetation standards to be met in the use of such rangelands. § 4110.3 The authorized officer shall periodically review the permitted use specified in a grazing permit or lease and shall make changes in the permitted use as needed to manage, maintain or improve rangeland productivity, to assist in restoring ecosystems to properly functioning condition, to conform with land use plans or activity plans, or to comply with the provisions of subpart 4180 of this part. These changes must be supported by monitoring, field observations, ecological site inventory or other data acceptable to the authorized officer. § 4130.3 Livestock grazing permits and leases shall contain terms and conditions determined by the authorized officer to be appropriate to achieve management and resource condition objectives for the public lands and other lands administered by the Bureau of Land Management, and to ensure conformance with the provisions of subpart 4180 of this part. § 4130.3-2 The authorized officer may specify in grazing permits or leases other terms and conditions which will assist in achieving management objectives, provide for proper range management or assist in the orderly administration of the public rangelands. These may include but are not limited to... These examples illustrate the broad discretion granted to the authorized officer. Instead of maintaining this approach in which such authority is vested in a single person, NMDA posits that a better approach is to rely on place-based scientific data collected over time, as well as consulting, cooperating, and coordinating with the permittee, lessee, applicant, or affiliate and other interested parties.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	21	General Changes to Regulations	BLM should update the regulations consistent with its policies described IM 2009-5762 in order to make clear that BLM managers may approve conservation nonuse annually, with no limit on how many years it may be approved, 43 C.F.R. § 4130.4(b), and to confirm other aspects of conservation nonuse, including: 62 Available at https://www.blm.gov/policy/im-2009-057 (last visited Feb. 29, 2020). · Revising §§ 4120.3-3(c), 4130.2(h), and 4130.6-2 to assure a policy that BLM will not grant temporary permits to other permittees or applicants for an allotment that is in approved temporary or conservation nonuse status; · Affirming § 4140.1(a)(2), which states that a permittee is not subject to any requirement to make "substantial grazing use" when conservation nonuse has been approved. Further, BLM should remove the three-year limit on temporary nonuse in 43 C.F.R. § 4130.2(g)(2). Given the competing interest in allowing permittees to rest an allotment from livestock use in the interest of land health, this provision is bad policy. BLM should also eliminate penalties for failing to make "substantial grazing use" when temporary or conservation nonuse is not authorized. Id. §§ 4140.1(a)(2) and 4170.1-2.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	20	General Changes to Regulations	BLM should adopt language to allow permit retirement under applicable land use plans when a permittee voluntarily waives its permit to BLM: "When a permittee waives its grazing permit back to the BLM with the intention that grazing will no longer be permitted on the associated grazing allotment, BLM will make that allotment unavailable for grazing under 43 C.F.R. §§ 4100.0-8, 4110.2-2, 4110.4-2(b), 4120.3-6, and 4130.2."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chandler	Pamela		NC	1030	4	General Changes to Regulations	ANY NEW REGULATIONS SHOULD: - Ensure gazing management preserves the habitat of grazed lands for wild horses, and wild life species with fairness in forage allocation. More and more habitat is being taken by livestock and mining with NO compensation for wild horses or wildlife. - Ensure NEPA analysis appropriately considers the habitat of wild horses and wildlife. - Include water quality and availability monitoring for wild horses and wildlife as part of land health evaluations. Gates are often closed when they should be open for wild horses and wildlife to access water. - Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods - Facilitate greater levels of public engagement for ALL, not a select few. Transparency is badly lacking. - Permit retirements buy-outs should be regularly employed

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Welsh	Shari	Take Action4Horses	CA	33	2	General Changes to Regulations	Any new regulations should not make new categorical exclusions. Expand use of EAs and EISs. Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat for native predators. Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. Forbid destruction of native vegetation to increase forage for livestock. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations. Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. Disclose underlying Indigenous land claims and address environmental justice issues. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dollard	Nancy		OH	21	1	General Changes to Regulations	Any new regulations should include these 14 points: 1-No new categorical exclusions and expand use of EAs and EISs. 2-Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. 3-Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. 4-Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. 5-Ensure grazing management does not impede grazed lands from serving as habitat for native predators. 6-Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. 7-Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. 8-Forbid destruction of native vegetation to increase forage for livestock. 9-Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. 10-Include water quality monitoring as part of the land health evaluations. 11-Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. 12-Disclose underlying Indigenous land claims and address environmental justice issues. 13-Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. 14-Require use of the best available science in livestock grazing decisions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Orchard	Charley		WY	1074	3	General Changes to Regulations	AMPs are too rigid, thus the use of OBG (Outcome Based Grazing) practices, which include management flexibility must be part of the bureau's management approach. Also, managers should consider and be able to include the forage value and production of existing seasonal plants (such as annuals) on the landscape, though not usually recognized. The use of Targeted grazing is an important tool to treat and manage desired vegetation and structure, as well as undesirables including invasive and noxious weeds. Such examples would include grazing and managing of annual invasives (like cheatgrass) for fuels reduction activities to mitigate fires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Watkins	Ross	Uintah County	UT	1148	7	General Changes to Regulations	Additionally, it is the county's opinion that an option should exist for emergency fuels management. This can be accomplished by opening strategic areas for grazing and allowing cattle to reduce fuel loads in potential burn areas. High risk areas should be identified by the local field office, and emergency permitting should have a categorical exclusion from the standard NEPA process in order to efficiently expedite permit approvals. The NEPA process is simply too cumbersome and time consuming to provide a yearly fuels report on every parcel of land, but the local field office could quickly determine lands that need to undergo fuels reduction practices. It would also be helpful if there were a way for grazers to approach the BLM and request emergency status on specific lands. The grazing community knows the land, and could likely provide valuable information regarding areas that have high potential for wildfire. Allowing grazers to participate in the fire management process would not only benefit the land, but also the local economy and agricultural output.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	13	General Changes to Regulations	A common request from livestock operators right now is to allow an either / or permit where either sheep or cattle could be used on any given year without the need to do a livestock conversion and amend the permit. The process do change these permits is too time consuming to be responsive to needed changes in the livestock market. The new grazing regulations should talk about how the BLM should handle Either / Or Permits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Winkler	Rich	Malpai Borderlands Group		1232	3	General Changes to Regulations	5. Use Targeted Grazing Authorizations for the use of livestock as a tool to accomplish rangeland improvement and/or other multiple use goals. 6. Broaden the use of Outcome Based Grazing Authorizations throughout the west.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Findling	Karl		OR	1135	3	General Changes to Regulations	3. Streamlining protests and appeals - This is likely a reference to a desire by the agencies to reduce timelines for public involvement, increase or codify exhaustion requirements, and to further limit opportunities for the public to be informed and participate. 1. The current NEPA process may be time consuming and difficult to manage at worst, but the outcomes highlighted can only occur after thorough science-based assessments of the landscape rangeland conditions are measured and assessed. 2. Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. 3. Disallowing the far-greater BLM-land user groups from giving input, reducing the timelines for public comment and input into managing their public lands should not be considered.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Roeber	Mark		CO	1454	1	General Changes to Regulations	3) BLM needs ability to be flexible in the term of permitted use to change season of use numbers of AUMs etc to do what is best for resource. Personally we see continued improvement in our allotments but know it could be faster if not tied to season of use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tanner	Jay		UT	1106	1	General Changes to Regulations	1. Please shorten and simplify the permit renewal. 2. I have suggested range improvements and would provide funding, but the process to receive approval to implement the projects takes too long and is very time consuming. 3. I would suggest that the range conservationists have the authority to adjust seasons of use and turn on and off dates. 4. Outcome based grazing seems to have great potential to both help permittees and improve the range resource. 5. Use Catagorical Exclusion to renew grazing permits with existing terms and conditions. 6. Change regulations for use after a fire. Sometimes grazing can help to reduce or suppress invasive weeds or plants. 7. Consider targeted grazing as a management tool for fire mitigation and prevention. 8. Allow more flexiblity for on off dates. 9.Temporary Non-Renewable AUMs should be readily available as a tool for managers to help achieve desired range conditions. 10.Please consider programmatic EIS for facilitating rangeland improvements. 11.Please modernizing rangeland health evaluations. They could be done much faster and still obtain desired evaluations. 12. Work more closely with the NRCS to allow permittees to help fund conservation actions. The NRCS Rangeland Analysis Platform could be utilized to help monitor rangeland.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miller	Stephen J.	Miller Land Co., Inc.	AZ	1484	5	General Changes to Regulations	1. Grazing decsions should have turn out date flexibility built in them. The actual date would still be determined by the range conservation officer but could be within a time frame ie. 10-15 days ahead or after scheduled date.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	907	4	General Changes to Regulations	· BLM needs to use consistent methods that remove personal opinion and bias, actually measure something and can be used across the majority of BLM allotments and provides understandable information that can be defended. · BLM needs to commit to collecting data in a timeframe that allows for developing meaningful trends.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osterhoudt	Elysia		NV	932	2	General Changes to Regulations	* Studies need to be addressed when it comes to Burn Areas sooner than 3 to 4 years after a burn in order to be grazed to control further burns in the same area.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osterhoudt	Elysia		NV	932	1	General Changes to Regulations	* Field Studies coordinated with NEPA and EIS needs to be addressed in a timely manner. These are very lengthy, time consuming and expensive studies. These need to be streamlined in a more effective manner to get all range improvement approved.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Magagna	Jim	Wyoming Stock Growers Association	WY	1028	2	General Changes to Regulations	WSGA would also urge you to remove the current surcharge for non-owned livestock. The imposition of this punitive charge has only served to force many permittees to create new legal structures such as LLCs to assure their ability to incorporate livestock with distinct ownerships. Regulations should reinforce that the permit holder is responsible for assuring that livestock are managed consistent with all terms of the permit and is the primary contact for agency personnel without regard to the ownership of the livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Magagna	Jim	Wyoming Stock Growers Association	WY	1028	6	General Changes to Regulations	WSGA fully supports BLM's recent implementation of targeted grazing pilot projects and urges that the revised rules foster this approach on a broad basis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Magagna	Jim	Wyoming Stock Growers Association	WY	1028	1	General Changes to Regulations	WSGA calls particular attention to the language recommended by the National Organizations regarding Mandatory Qualifications assuring that the permit holder "be engaged in, or facilitating the production of, livestock and will use the public lands to graze livestock". This carefully crafted language assures that lands permitted for livestock grazing are actually grazed while at the same time recognizing that such engagement does not necessarily mean owning livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cumming	Joe and Kristi	Bar C Land and Livestock	NV	1438	1	General Changes to Regulations	Would like to change or have the ability to tweak our grazing date and schedules.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Jen			1241	2	General Changes to Regulations	With the current drought conditions, climate change and rapidly changing conditions, I feel 10 year permit renewals are too long and don't allow assessment of current conditions, further exacerbating the damage to the range.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	3	General Changes to Regulations	With respect to the efficiency of processing temporary nonrenewable grazing permits and permits to authorize grazing as a fine-fuel reduction tool (sometimes referred to as "Targeted Grazing"), the OCA reiterates the following: * Any Animal Unit Months (AUM) authorized by such permits should not count toward the permitted AUMs of an existing preference grazing right or term permit * The issuance of such permits should be categorically excluded from NEPA analysis * Such permits should not be issued if they conflict with existing preference grazing rights or term permits * Such permits should be administered with the appropriate regulatory flexibility (as expounded in BLM Instruction Memorandum No. 2018-109} necessary to achieve the desired management objective * BLM may issue decisions authorizing nonrenewable grazing permits in full force and effect under subpart 4160 of title 43

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beymer	Tanner	Public Lands Council & National Cattlemen's Beef Association	DC	1015		General Changes to Regulations 1	With respect to the efficiency of processing temporary nonrenewable grazing permits and permits to authorize grazing as a fine-fuel reduction tool (sometimes referred to as "Targeted Grazing"), the Livestock Groups reiterate the following: * Any Animal Unit Months (AUM) authorized by such permits should not count toward the permitted AUMs of an existing preference grazing right or term permit * The issuance of such permits should be categorically excluded from NEPA analysis * Such permits should not be issued if they conflict with existing preference grazing rights or term permits * Such permits should be administered with the appropriate regulatory flexibility (as expounded in BLM Instruction Memorandum No. 2018-109) necessary to achieve the desired management objective * BLM may issue decisions authorizing nonrenewable grazing permits in full force and effect under subpart 4160 of title 43
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Bricanah	American Wild Horse Campaign	VA	966		General Changes to Regulations 8	With outcome-based grazing there is a means to plan for crossing authorizations and utilize flexibility. However, without this plan the grazing permittee and BLM's commitment to land use planning should continue to use the current system while maintaining the decision and protest period to allow for adequate public input and appropriate management decision documentation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eisenach	Kurt	Wyoming Wild Sheep Foundation		1161		General Changes to Regulations 11	While there appears to be much discussion surrounding use of livestock grazing to meet management goals and objectives, short and long term rest/deferment from grazing should also be given consideration as a "treatment option". Consider the use of temporary permits to consolidate livestock from more than one permittee in an allotment, which can afford rest in other locations (pastures or allotments). To complete targeted grazing strategies, it may require increasing animal densities to reduce plant selectivity or to assist in focusing on certain plant species with limited windows of palatability. Improved temporary or permanent infrastructure may be necessary (water developments, fencing, other) to conduct treatments successfully. When completing these types of treatments with consolidated permits, it should afford an opportunity for rest/deferment in other pastures or allotments in a growing season or entire year. Rest is a form of treatment and should be utilized as such to build native, perennial plant health and vigor.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cerri	Ronald		NV	1060		General Changes to Regulations 3	When targeted grazing occurs on dormant perennial plants, the BLM must relax the utilization standards often in place. Dormant season use removes dead leaves and stems while not affecting live tissues on the root crown or root system. Removing this dead material has little effect on perennial plants because they have completed their growth processes for the year, but, rather, meets the objective of reducing the threat of annual grasses for fuels management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Magagna	Jim	Wyoming Stock Growers Association	WY	1028		General Changes to Regulations 5	When Congress passed the Taylor Grazing Act of 1934, it provided for the leasing of those isolated parcels of land that were not suitable for being included in grazing districts. There was a recognition that the grazing use of these lands was dependent on the use of the intermingled private and state lands and needed to be administered in a manner compatible with those lands. These leases were administered in a manner that granted more discretion to the lessee than a typical permit with somewhat less direct agency oversight. While agency regulations continue to refer to "permits and leases", beginning in the mid 1990's BLM began to replace expiring leases with permits. WSGA urges that you separate Section 15 lands in the revised regulations, provide for the issuance of leases on these lands and restore lessee flexibility that has been removed in recent years.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Mark		NV	1390		3 General Changes to Regulations	We would like to suggest that adaptive, flexible management practices be the first step in addressing the BLM's concerns with an allotment instead of AUM reductions. This flexibility should be in cooperation with the affected permittee(s) and take in to account their observations of the landscape, since they tend to be on the allotment more than anyone else. Prior to any reduction in AUMs, appropriate steps should be taken to ensure that it is, in fact, livestock grazing that is causing any problems on the allotment. This should include looking closely at wild horse damages, drought or flood conditions, fire impacts and any other extenuating circumstances that often put the health of the allotment at risk. Then, if any of those conditions are the source of negative allotment conditions, livestock grazing should be managed appropriately to help mitigate those impacts. The BLM should look at livestock grazing as a tool for BLM employees to use, instead of a scapegoat for the issues that arise on our rangelands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Abraham		UT	1166		2 General Changes to Regulations	We would like to see more control at a local level. To often mandates are given country wide without taking in to account how vastly different ranges are from county to county, let alone state to state. We can not use a "one size fits all" mentality on rangelands throughout the country
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cerri	Ronald		NV	1060		6 General Changes to Regulations	We would like to request language included in the new grazing regulations stating that forage banks will not be established and existing forage banks will be discontinued. Forage banks allow for increased fuel loads, resulting in increased fire risk to the resources, both BLM and private property. We would also like to see all vacant allotments assigned to an authorized applicant as soon as possible to mitigate increased fire risks and provide for improved rangeland health by allowing managed livestock grazing
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hendrickson	Amy	Executive Director	WY	1291		2 General Changes to Regulations	We urge the BLM to include improvements to the regulations that will increase the opportunity for adaptive management strategies and flexibility to address needs of the resources and the public lands ranchers who depend on those resources. This includes BLM's recent implementation of targeted grazing pilot projects and urges that the revised rules foster this approach on a broad basis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721		7 General Changes to Regulations	We support the move toward Outcome Based Grazing, where the focus is on meeting habitat and vegetation objectives and land health standards rather than on rigid on/off dates for allotments. This type of management allows the grazer to demonstrate their ability to be a good steward of the land. Providing flexibility in grazing schedules and stocking rates makes sense as range conditions will vary from year to year. We suggest at least two weeks to one month of flexibility be provided for on/off dates to account for changing range and weather conditions from year to year. We look forward to the results of the Outcome Based Grazing demonstration projects occurring on BLM lands in Oregon, Nevada, Colorado, Wyoming, Montana and Idaho and suggest that a demonstration project be established in Utah.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tipton	Frosty	T Quarter Circle Ranch	NV	1181	29	General Changes to Regulations	We support targeted grazing as a fine fuel management tool. The regulations will better facilitate use of this tool by incorporating the following changes: -The issuance of targeted grazing permits should be issued under programmatic NEPA (including this EIS) and site-specific applications categorically excluded from NEPA analysis. -Targeted grazing authorizations should be separate from regular grazing authorizations. That is, the Animal Unit Months (AUM) authorized by such permits should not count as or reduce the number of AUMs permitted under existing grazing preference or term permit. -Targeted grazing authorizations should not conflict with existing grazing preference or term permits. -BLM Instruction Memorandum No. 2018-109 provides direction so that targeted grazing authorizations can be issued and administered with the appropriate flexibility necessary to achieve the desired management objectives. -43 CFR 4160 provides BLM with authority to issue decisions authorizing nonrenewable grazing permits in full force and effect.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cooper	Mary Anne	Oregon Farm Bureau	OR	893	3	General Changes to Regulations	We specifically echo and support the recommendation by the Livestock Groups to ensure that rangeland health standards and permit decisions are based on sound data that reflects an actual quantitative assessment of grazing on the allotment. We are concerned about the lack of data that is going into significant permitting decisions we are seeing in Oregon, and believe that any update to the rangeland health standards should do a better job than the existing regulations in ensuring that permitting decisions are based on sound- science and are driven by quantitative data. We also support BLM evaluating ways to use livestock grazing to reduce wildfire risk and improve rangeland conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bradshaw	Charlie		WY	1379	8	General Changes to Regulations	We request that livestock grazing to be considered as a tool for noxious and non-native species management. Sheep grazing can be used as an excellent tool to reduce the spread of noxious and nonnative species. Cattle grazing can be used to reduce noxious and non-natives species as well as to reduce the intensity of wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	11	General Changes to Regulations	We recommend that the reference to the development of a land use plan be changed from a regulatory reference to 43 CFR part 1600, which is another BLM regulation, to the FLPMA which is the only legal authority for a BLM land use process. It is our opinion that the BLM Regulations at CFP part 1600 do not now, on a variety of subjects, reflect the intent of Congress as stated in FLPMA. We also recommend that language in this definition that conveys that land use plans establish "direction" be removed. The word "direction" should be replaced with guidance.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Crowder	Jessica	Western Landowners Alliance	WY	1082	2	General Changes to Regulations	We encourage the BLM to utilize outcome based grazing opportunities with those land managers that are interested so they can work collaboratively to manage their grazing allotments. Some land managers have suggested that, through this revision and EIS development process, the BLM could consider offering an opportunity for existing livestock permit and lease holders to enter into a new type of permit that allows for the appropriate use of livestock to meet land health standards and livestock producer goals. This new type of voluntary permit could be considered a stewardship permit. A stewardship permit could, through an allotment management plan, consider what is needed to provide appropriate rest to allotments and meet conservation goals. Livestock grazing is not mutually exclusive of good management and stewardship permits would consider how livestock grazing can be utilized as a beneficial land management tool. This type of permit may allow those permittees that are interested in non-use (for a period of time determined through appropriate analysis and planning) or reduced use, management intensive grazing, targeted grazing to meet land health goals, or a concentration on managing at-risk species habitat, a method of doing so without penalty. WLA respectfully asks that the BLM consider this need and opportunities to improve flexibility in its forthcoming EIS and regulations revision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Adams	Chase	American Sheep Industry Assn	CO	1031	5	General Changes to Regulations	We believe that BLM has made adverse rangeland health determinations in the past that have resulted in decreased permitted use, §4110.3-2. Therefore, we request in the event of monitoring trends indicating grazing use inconsistent with the provisions of these regulations the first action should be to modify management practices to achieve set objectives and then only if those objectives are not met, reduce active use in direct proportion to the quantity of the inconsistent use or carrying capacity. Moreover, any decrease in active use should be classified as suspended use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	VanValkenburg	Adam	North Park Stockgrowers Association	CO	924	1	General Changes to Regulations	We at the North Park Stockgrowers Association are concerned with the possibility of individuals and interests obtaining BLM grazing permits with no intention of grazing the allotment. There are interests that want to shut down grazing by obtaining permits and claiming non-use. We would like strict enforcement on non-use regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hendrickson	Amy	Executive Director	WY	1291	3	General Changes to Regulations	We also encourage the BLM to incorporate provisions that encourage development of incentive-driven programs that foster proactive resource management. Examples of successful incentive-driven programs include NRCS conservation programs, USFWS programs and state programs, all of which are very effective in helping to achieve resource objectives on private land. Unfortunately, BLM grazing permittees are not able to derive similar benefits from these programs because their federal permits discourage participation. We would encourage BLM to take the opportunity through this grazing regulation revision to incorporate incentives for proactive permittee activities that go beyond the strict terms of a permit. Provisions such as extended permit lengths, increased levels of permitted AUMs and greater permit flexibility would foster participation in pro-active incentive-driven resource management programs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dietz	Victoria	Washakie County Conservation District	WY	1000	5	General Changes to Regulations	WCCD is in support of the outcome-based grazing that aims to provide livestock operations greater flexibility to adjust grazing to the changing conditions, excess forage, fuel loads, drought, and wildfire. With the flexibility to adjust grazing to the on the ground conditions, permittees would be able to use their forage resource more effectively and efficiently, while ultimately meeting land health standards and sustainability objectives.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Thompson	Troy	Wyoming County Commissioners Association	WY	881		2 General Changes to Regulations	WCCA asks that BLM consider revising the grazing regulations to allow greater management flexibility on a district and field office level and permit-to-permit. Conditions vary significantly from one allotment to the next throughout the West and land managers should have the authority to respond efficiently and effectively to specific rangeland needs. For example, so long as resource conditions are favorable, BLM should allow permittees to adjust the dates on which they move livestock on and off of rangelands. Often, in the Mountain West, a long winter can impede a permittee's ability to get on public lands for grazing or a warm spring may call for earlier entry. Presently, the dates provided in a permit are rigid- there is no deviating from them without additional analysis. BLM should consider granting exceptions for timing flexibility when conditions permit or require.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frandsen	Fred	Washakie County Commissioners	WY	1246		2 General Changes to Regulations	Washakie County also supports incorporating outcome-based grazing into the BLM's grazing regulations consistent with the BLM's efforts to adopt this practice via policy. Outcome-based grazing provides permittees the opportunity to work with the agency to respond quickly to changing conditions on the landscape, such as drought, wildfire, fuel loads and excess forage. This meets well with the county's policy to support practices that sustain agricultural interests from season to season as well as long term.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897		15 General Changes to Regulations	Voluntary Retirement of Preference While there are some IMs out on this subject, the modern grazing regulations should clarify how BLM will handle the voluntary retirement of preference. This will help ensure this subject is clear for all the American public, before they decide to purchase a permit with the intent to retire it.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950		8 General Changes to Regulations	Validation of the said claim through documentation, testimony and argument shall be accomplished before the Land Claims Board. In addition, any prior administrative action taken against the Claimant by any component of the Department of Interior, directly associated to and affected by the said claim, shall be open for review by the board. In such an event, such actions by the Board may overturn any prior administrative action to the benefit of the Claimant. The benefit may include, but are not exclusively limited to, the expungement of the action, return of any fines or the reinstatement of any right or privilege taken in the prior administrative action.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834		10 General Changes to Regulations	Using Livestock Grazing as a Tool The State is particularly supportive of incorporating ways to streamline the ability to use targeted grazing for vegetation management and/or fuel breaks. When used appropriately, targeted grazing has shown to be a cost-effective and successful tool for woody plant encroachment, fuels management, invasive annuals, and a myriad of other management issues. Flexibility in grazing will provide the opportunity to use livestock to control invasive annual grasses such as cheatgrass. The use of livestock grazing is a cost effective and proven method to reduce biomass of invasive annual grasses across rangelands. According to Schmelzer 2009: Cattle can be easily concentrated on cheatgrass during the fall, effectively reducing the amount of total fuel available during the next fire season." And "We found that cheatgrass was reduced without affecting the cattle's performance, or harming the perennial plants present, at least in the short-term. Flexibility in livestock numbers and timing will also be an advantage to reducing cheatgrass, due to the extreme variability in production of cheatgrass.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	13	General Changes to Regulations	Unauthorized use Non Authorized usages, NEPA studies often times prevent improvements from being made to disallow livestock from grazing in unauthorized areas. "Trespass cattle" as a term could easily be abused by not identifying unauthorized parameters properly. Properly dealing with unauthorized areas by taking necessary actions to prevent trespass including improvements and upgrades i.e. constructing or repairing fences.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	9	General Changes to Regulations	Unauthorized Use I was very glad to see the proposed changes to allow for some level of reasonability associated with Unauthorized Use, when the use is incidental and non-willful. The difference between the "Bundy Situation" and a single cow calf pair left behind in a pasture by accident are similar to the differences between night and day. Spelling out the proper process for handling incidental issues is an excellent idea. Perhaps setting a limit on total amount of forage impacted (i.e. less than 20 AUMs or something like that), and then stating that if the individual corrects the issue within a certain amount of time (for example 3 days) then no official trespass record is required.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	8	General Changes to Regulations	Unauthorized Use I was very glad to see the proposed changes to allow for some level of reasonability associated with Unauthorized Use, when the use is incidental and non-willful. The difference between the "Bundy Situation" and a single cow calf pair left behind in a pasture by accident are similar to the differences between night and day. Spelling out the proper process for handling incidental issues is an excellent idea. Perhaps setting a limit on total amount of forage impacted (i.e. less than 20 AUMs or something like that), and then stating that if the individual corrects the issue within a certain amount of time (for example 3 days) then no official trespass record is required.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	7	General Changes to Regulations	Unauthorized Use I was very glad to see the proposed changes to allow for some level of reasonability associated with Unauthorized Use, when the use is incidental and non-willful. The difference between the "Bundy Situation" and a single cow calf pair left behind in a pasture by accident are similar to the differences between night and day. Spelling out the proper process for handling incidental issues is an excellent idea. Perhaps setting a limit on total amount of forage impacted (i.e. less than 20 AUMs or something like that), and then stating that if the individual corrects the issue within a certain amount of time (for example 3 days) then no official trespass record is required.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lally	Meghan	Salisbury Livestock Company		1119	2	General Changes to Regulations	Trailing is an essential part of many operations that graze on the BLM. Many offices have gone through the NEPA process to permit trails for certain operations. There is no flexibility to change those trails in the case of changes in the operation size, weather problems, or other considerations. There needs to be a way to build flexibility in the trailing rules. Categorical exclusions need to be used in these cases. Also, BLM roads are publicly accessible roads. They should be considered like county and state roads for trailing. The same easements that allow the public to drive across private property to access BLM property, should be used to allow trailing on these roads. There also needs to be a standard notification procedure. This should include notifying permittees that you are trailing across during their season of use by text, email, or phone, with no abuse allowed to the calling permittee.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	24	General Changes to Regulations	To the extent that BLM plans to revise the requirements for land health evaluations spatially or temporally, it should consider an alternative that requires allotments to be fully evaluated at least once a decade, in addition to site-specific monitoring that may be conducted at greater frequency (utilization, actual use, stream bank trampling, etc.).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heisler	Jane		OR	706	1	General Changes to Regulations	To say that expediting grazing authorizations as “a tool to reduce wildfire” or to “improve rangeland conditions” is just false. There is no positive correlation in the scientific literature that suggests grazing can achieve either outcome and a large body of evidence to the contrary, but it’s clear that BLM seeks to expedite these types of permits under the guise that it will benefit public lands. In fact, grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sparks	Tom		MT	1110	1	General Changes to Regulations	To increase efficiency of the permitting process, perhaps permits of less than 100 AUs (animal units) should be sold or give them billing for 3-5 years at a time. This would eliminate the time spent every year on preparing their statements.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950	3	General Changes to Regulations	To create and administer a publicly reviewable database that is binding upon all parties, either governmental or private citizen stakeholder, to quantify and delineate the holdings and stakes of any party to rights, privileges or ownership in or on public property. Any issue inclusive in such a database shall include, permits and/or licenses to graze, rights of usage, pre-existing rights of any nature, rights of way, mineral rights, water rights, surface rights, possessory interest(s), patents or vested rights and non-vested property rights.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gaines Quammen	Betsy			1333	2	General Changes to Regulations	Three things occur to me in regards to this EIS process. Number one, monitoring is not currently adequate. The BLM, under NEPA, FLPMA and the ESA, must to ensure that livestock numbers are not exceeding the ability of the land to be resilient. Livestock operations using public land leases must be managed to maintain viable wildlife populations (especially of threatened and endangered species); to make sure water resources are clean and running at normal levels; and that native vegetation is robust and not disappearing with the spread of noxious weeds. Number two, those who are unlawfully exceeding permit levels must have permits revoked--this is not currently happening and some places have become lawless. And number three, data from monitoring must remain public and we must maintain the right to comment and weigh-in on BLM EIS and EA processes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Laurie		NM	1374	9	General Changes to Regulations	These revisions must also consider supporting existing federal regulations governing the management and protection of wild horses and burros: § 4710.5 Closure to livestock grazing. (a) If necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros, to implement herd management actions, or to protect wild horses or burros from disease, harassment or injury, the authorized officer may close appropriate areas of the public lands to grazing use by all or a particular kind of livestock. (b) All public lands inhabited by wild horses or burros shall be closed to grazing under permit or lease by domestic horses and burros. (c) Closure may be temporary or permanent. After appropriate public consultation, a Notice of Closure shall be issued to affected and interested parties

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hunt	Sue	V Cross Cattle Company	WY	1324	1	General Changes to Regulations	There should be much more flexibility in the management of grazing permits. The monitoring and science are worthless with flexibility coupled with year to year conditions. All uses of BLM land (grazing, oil & gas, recreation, wildlife, wild horses}should alt meet the standards and guidelines for being used.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Shepperson	Amy			1224	2	General Changes to Regulations	There should also be more flexibility in grazing management practices. Different rotations, dates of use and numbers and kind of livestock should be allowed to fluctuate somewhat from year to year for a better management standpoint. Doing the same thing year after year is not always the best management practice.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ruprecht	Peter		CO	1039	1	General Changes to Regulations	There is no scientific evidence that cattle and sheep grazing improves range health. It seems to me that the opposite must be true. I hope you will carefully assess Land Health Standards on every allotment and hold the permittees to the current standards every year. It would be even better to make the standards stronger. I ask you to vigorously investigate grazing violations, much more than is done today, and assess meaningful penalties whenever the rules are broken. Similarly, I hope you will undertake more frequent environmental analyses and offer opportunities for public input whenever possible.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lally	Meghan	Salisbury Livestock Company		1119	5	General Changes to Regulations	There have been proposals to collar livestock on BLM. The argument made was that it would allow the BLM to monitor the location of livestock without leaving the office. They would like these to be permanent collars, that would stay on the livestock year round, even when not on the BLM. This data would be FOIAable. I, as a permittee, find this possible requirement unacceptable.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Sierra	Utah Wool Growers Association	UT	1145	1	General Changes to Regulations	There are substantial benefits to livestock grazing including reducing the risk of catastrophic wildfire by judiciously grazing light flashy fuels such as cheatgrass. Cheat grass is not good for much of anything once it dries out- except for fires. Why not graze it when it is edible and useful? This is why updating the grazing regulations are so important because it takes flexibility to make it happen. We aren't just speaking in hypotheticals. This year we have some green grass starting on the desert already as of March 1st. We have seen plenty of years when there's no green until mid-April and we are shipping off the BLM with knee high cheatgrass in our wake because there is no flexibility in the dates. Mother nature doesn't rely on a calendar to decide when to green up, ergo ranchers need to be able to adapt to changes in the feed each year to manage their grazing correctly to benefit the land, the sheep, and the wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harvey	Bill	Baker County	OR	747	1	General Changes to Regulations	There are over 33,600 acres of Greater Sage-Grouse Core Areas in Baker County. The County firmly believes that "what's good for the herd, is good for the bird" and encourages the BLM to manage the livestock allotments as such.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brackett	Gus	71 Livestock Association	ID	1112	1	General Changes to Regulations	There are multiple ways to increase flexibility, but we contend that creating a decision making process in the grazing regulations that is streamlined, efficient, and timely is the most effective way to provide range managers with flexibility. As currently constructed, if a decision making process takes thirty years, decisions are obsolete and disconnected from the analysis by the time the decision is implemented. And this process becomes even more unwieldly if the ecosystem becomes more dynamic with climate change. If a process can be established in the grazing regulations that enables a decision on a resource management plan in less than two years and if the plan is easily amendable, then the grazing regulations will be inherently flexible. If a process can be established in the grazing regulations in which a grazing permit can be renewed every ten years as designed, and can be amended in a timely manner, then, again, the grazing regulations will be inherently flexible. This inherent flexibility not only will allow a range manager to adjust to a dynamic ecosystem, it will also allow them to adjust for more dramatic changes in climate. It will also allow range managers to change a range management prescription that may not be working. This is the flexibility we would like to see in the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	16	General Changes to Regulations	The State of Idaho is concerned with the lack of proper Consultation, Cooperation, and Coordination (CCC) between the BLM and the State and would support revising the grazing regulations in a way that would include increased CCC with important agencies and NGO's in major management decisions such as permit renewals, significant range improvements, fire rehabilitation efforts, etc. Such CCC is especially important when those decisions affect partners on the landscape. Currently, throughout the process of renewing grazing permits, the State of Idaho has been treated as an interested public. The State does not view this approach as proper CCC. Grazing decisions made by the BLM have an impact on Idaho's citizens, wildlife, economies and rangelands. For this reason, it is imperative that the BLM improve CCC requirements in the revised grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Scarbrough	Gary	Otero County Public Land Use Advisory Council	NM	1202	2	General Changes to Regulations	The requirement for crossing authorizations being the same process as a typical 10 year grazing permit or lease may be detrimental to permittees/lessees and grazing efficiency. When it is time to move livestock, the permittee/lessee does not have years to wait for permission from an overloaded bureaucracy. Even though crossing authorizations are subject to categorical exclusions, they are still required to produce a Proposal Decision and provide a Protest Period. Workload and time will be greatly reduced should an issuing decision be effective immediately by eliminating the Protest Period.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Jon	Sagebrush Habitat Conservation Fund	ID	891	2	General Changes to Regulations	The regulations should provide clear and effective ways for grazing permittees to implement beneficial livestock management actions such as nonuse and grazing permit retirement. At a minimum, BLM should adopt language to make allotments unavailable for grazing under the applicable land use plan(s) when a permittee voluntarily relinquishes its permit, and remove limits on how many years a permittee can take nonuse. BLM should also clarify that it will not permit use of an allotment in nonuse status by another applicant or grazing permittee. The regulations should remove the requirement for permittees to make "substantial grazing use" of a permit.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Jon	Sagebrush Habitat Conservation Fund	ID	891	11	General Changes to Regulations	The regulations should make clear that when AUMs are reduced for resource protection, they are permanently cancelled, not simply moved to "suspended use."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	4	General Changes to Regulations	The regulations should include wholesale changes from "permittee" to "preference holder." This would return to the intent of the Taylor Grazing Act and true grazing preference. The definition of "grazing preference or preference" should be restored to its pre-1995 version and include a priority position for renewal of a grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	3	General Changes to Regulations	The regulations should include clarification that if a permitted use for a grazing permit is to be reduced due to another permitted multiple use, mainly mining, any reduction would be based on field work and monitoring to quantify the actual forage lost, not some simple math exercise as we have often seen occur (e.g., simply dividing total AUMs across an allotment into the acreage lost to grazing due to an anthropogenic disturbance). Our ranching operation is right in the middle of actively expanding mining operations. While most of these are in higher elevations and often not ideal grazing lands, calculations are being done as a table top exercise and neighbors are having significant reductions in AUM's while no real reductions in forage is being seen on the ground. These types of actions are hurting not only the ranching operation but the rural communities that rely on dollars from these ranches.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Jon	Sagebrush Habitat Conservation Fund	ID	891	5	General Changes to Regulations	The regulations should ensure that grazing management does not impede healthy, functioning populations of predators throughout their historical ranges, including grizzly bears and wolves.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	7	General Changes to Regulations	The regulations should clarify the trailing/crossing permits process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Crowder	Jessica	Western Landowners Alliance	WY	1082	5	General Changes to Regulations	The regulations should alter billing cycles so all permittees/lessees pay for what is utilized when the grazing season is complete. Some permittees/lessees currently utilize this system and have found it to work well. Other permittees/lessees receive their bill prior to use, requiring the BLM to adjust fees when the grazing season is over. This simple change in the regulations would reduce administrative costs and time.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	24	General Changes to Regulations	The proposed rulemaking is an opportunity to support voluntary relinquishment or retirement of grazing permits on public lands. New rules should require BLM to balance competing resource values to ensure that public lands are managed in a manner "that will best meet the present and future needs of the American people." 43 U.S.C. § 1702(c). This mandate should be implemented via a "reasoned and informed decision-making process"-either during land use plan revisions, or, where RMPs have not conducted the requisite balancing, when issuing or reissuing grazing permits/leases. Such determinations should be supported by proper findings on the record and subject to public participation and comment. Conducting these analyses could help facilitate voluntary grazing permit relinquishment and go a long way toward realizing the goal of "economically sound and ecologically healthy landscapes" on public lands (BLM 2004).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Zarrello	Dana	The Cloud Foundation		1337	8	General Changes to Regulations	The Proposed Grazing Regulation Revision must address the fact that cows are being bred to be far larger than they were in 1971 and, as a result, would likely contribute to the overgrazing of rangeland as bigger animals eat more forage.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davenport	David		MT	1279	1	General Changes to Regulations	The producers that try to increase soil health by use of rotational grazing or other means should be rewarded by probably increasing carrying capacity numbers. Grazing fees should increase in relation to state leases.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hendrickson	Amy	Executive Director	WY	1291	1	General Changes to Regulations	The Notice of Intent mentions that since the 1995 and 2006 regulatory revisions additional legislation has given statutory direction to the Agency. An example is the FY2015 National Defense Authorization Act [P.L. 113-291], which contained several grazing provisions important to Wyoming sheep producers, including the categorical exclusion of trailing and crossing permits under the National Environmental Policy Act (NEPA). We ask BLM to incorporate these statutory directions into the grazing regulation revision along with other provisions, such as direction regarding the prioritization and timing for the completion of NEPA analyses and the continuation of grazing permit terms and conditions in instances where the NEPA cannot be completed before the expiration of a term grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Whicker	Keven	Beaver County	UT	754	2	General Changes to Regulations	The next most sought after change would be more flexibility in on/off dates. The conditions on the range will change from year to year. What may be an optimum time to turn out one year may be completely different the next. Also, the amount of forage available can change from year to year and the use of the range should be adjusted to the conditions. There needs to be more flexibility in adjusting these on/off dates to properly utilize the forage and adapt to seasonal range conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Magagna	Jim	Wyoming Stock Growers Association	WY	1028	3	General Changes to Regulations	The land use planning process is the appropriate opportunity for broad public input into the management of BLM administered public lands. An allotment management plan is a technical document that reflects the particular conditions of the resource and the role of the public lands in the ranching operation. The development of this plan should only involve directly affected interests who have other permitted activities within the allotment. Annual operator meetings between the permittee(s) and the responsible BLM range conservationist should be restricted to those two parties.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	12	General Changes to Regulations	The Interior Board of Land Appeals (IBLA) has ruled that the burden of proof in respect to grazing decisions is on the appellant. Many decisions of authorized officers have a direct economic impact on the permittee/lessee. Grazing allotments are affected by many things and livestock grazing is not the sole influence on rangeland conditions. Often BLM personnel are unfamiliar with the permittees/lessees particular rangeland, ecosystem, and climate. In recent years livestock have been unfairly held responsible for rangeland conditions when conditions do not meet arbitrarily set standards. At times such decisions may be based on personnel's opinion. Personnel may or may not have the appropriate experience to determine rangeland heath. Their 'authorized' decisions could make or break a permittee/lessee. It is nearly impossible to develop a legal challenge to a decision based on "data acceptable to the authorized officer". Again, this inconsistent BLM management is arbitrary and capricious and in violation of NEPA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	7	General Changes to Regulations	The Grazing Regulations should always make reference to Section 3 and Section 15 of the TGA where applicable.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doverspike	Susan		OR	850	1	General Changes to Regulations	The grazing regulations need to include: FLEXIBLITY because: 1. Weather can impact turn out time. If it's been a long winter there may still be snow on the ground and the grass hasn't had a good chance to start. 2. If Spring has come early and the grass has a good start, letting a permittee turn out a week or two earlier than the designated turn out time could help control fire hazards. 3. allow grazing as a fire management tool by grazing the fine fuels in off season 4. water holes may have water at different times. 5. special specie issues. We move from our BLM allotment straight onto our USFS allotment across the fence. The BLM has asked us to change our gather times by a week every year in order to accomodate the sage grouse needs. Our BLM pasture is basically 26 square miles and it takes 6 of us 6 full days to gather that pasture to move to the Forest across the fence. We don't have a place to keep the cattle if flexibiltiy for the moving date isn't allowed. We try to accomodate the sage grouse, but it is important to know that we are working with several agencies by doing so.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Jon	Sagebrush Habitat Conservation Fund	ID	891	10	General Changes to Regulations	The Fund supports increased enforcement and strict adherence to the regulations' current unauthorized use and trespass provisions. There is no need for revision of these provisions, just more diligent oversight and compliance.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Jon	Sagebrush Habitat Conservation Fund	ID	891	1	General Changes to Regulations	The Fund requests that the regulations preserve all opportunities for public participation in the administration of grazing on public lands. The regulations should not limit "interested public" status to only one year at a time, and should continue to allow electronic submission of comments and all other forms of public participation. All relevant documents should be promptly posted online on BLM's databases. The public should also be invited to accompany BLM on field visits and monitoring.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Jon	Sagebrush Habitat Conservation Fund	ID	891	4	General Changes to Regulations	The Fund recommends that the regulations disallow vegetation "treatments" that harm natural ecosystems to benefit domestic livestock. Specifically, the regulations should prohibit shrub removal, seeding with non-native species like crested wheatgrass, and should institute a moratorium on juniper and pinyon pine removal on public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Jon	Sagebrush Habitat Conservation Fund	ID	891	7	General Changes to Regulations	The Fund opposes use of livestock to attempt to reduce fire occurrence by removal of "fuel" or to address cheatgrass infestations through "targeted" or "prescribed" grazing. A large body of published, peer-reviewed scientific findings conclude that livestock grazing is the most important cause of the establishment and spread of cheatgrass and other invasive annual grasses, and that intensive livestock grazing will worsen the problem. Additionally, fires are controllable during normal weather conditions, and during extreme weather conditions-high temperatures, low relative humidity, and high wind-fuel is not a significant driver of fire behavior. The regulations should also explicitly provide that following fires, BLM will set objective recovery standards that include native woody vegetation, and not permit grazing to resume until they are met.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Jon	Sagebrush Habitat Conservation Fund	ID	891	8	General Changes to Regulations	The Fund also opposes expansion of the BLM's "outcome based grazing" pilot program. BLM as trustee of the public lands for the American public is vested with the duty and responsibility to manage livestock grazing. BLM cannot delegate that duty to private grazing entities by providing "flexibility" to use the public lands as they see fit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Withroder	Amanda	Wyoming Game and Fish Department	WY	1014	5	General Changes to Regulations	The Department supports targeted grazing to assist with vegetation management; however, class of livestock, season of use, impacts to non-target vegetation, and wildlife should be considered. Additionally, some targeted grazing practices may be effective at lower elevations, but ineffective at higher elevations. Targeted grazing for fuel reduction should be well defined for different geographic areas, as the term "fire season" means different things across the country. Targeted grazing often refers to practices which require higher intensity management from herdsman, increased temporary or permanent infrastructure (e.g., fencing), or other means to control livestock movements to focus grazing pressure on targeted plants. Infrastructure installed to manage grazing (e.g., fence) should allow for passage by wild ungulates. Habitats in need of restoration such as riparian habitats, floodplain restoration, and managing encroaching woodlands through prescribed fire could also benefit from targeted grazing in conjunction with other appropriate management tools.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Withroder	Amanda	Wyoming Game and Fish Department	WY	1014	4	General Changes to Regulations	The Department supports targeted grazing to assist with vegetation management; however, class of livestock, season of use, impacts to non-target vegetation, and wildlife should be considered. Additionally, some targeted grazing practices may be effective at lower elevations, but ineffective at higher elevations. Targeted grazing for fuel reduction should be well defined for different geographic areas, as the term "fire season" means different things across the country. Targeted grazing often refers to practices which require higher intensity management from herdsman, increased temporary or permanent infrastructure (e.g., fencing), or other means to control livestock movements to focus grazing pressure on targeted plants. Infrastructure installed to manage grazing (e.g., fence) should allow for passage by wild ungulates. Habitats in need of restoration such as riparian habitats, floodplain restoration, and managing encroaching woodlands through prescribed fire could also benefit from targeted grazing in conjunction with other appropriate management tools.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Withroder	Amanda	Wyoming Game and Fish Department	WY	1014	2	General Changes to Regulations	The Department is supportive of the opportunity to streamline processes for one-time needs, such as land treatments. Having the opportunity to quickly react to changing conditions associated with wildfire, drought, and habitat treatments will certainly have benefits to wildlife, livestock, and overall land health if implemented appropriately. The proposal has the potential to improve efficiencies in recovering pastures/allotments following large-scale disturbances such as wildfires by moving livestock to other rangelands. Additionally, being able to make changes in grazing management in a timely manner could benefit treatment preparation or post-treatment grazing prescriptions. However, more information is needed on what would be considered a "qualifying event".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	8	General Changes to Regulations	The current automatic two-year deferral of grazing after fire should be amended. After fire, if an area is not seeded and has cheatgrass, grazing should begin as soon as possible to suppress the cheatgrass. Such decisions should be made at the site specific level.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Simkins	Connie	N-4 State Grazing Board	NV	1410	2	General Changes to Regulations	The Board requests that adaptive, flexible management practices be the first step in addressing the BLM's concerns with an allotment instead of AUM reductions. This flexibility should be in cooperation with the affected permittee(s) and take in to account their observations of the landscape, since they tend to be on the allotment more than anyone else. The Board strongly feels that a marriage of permittee observations and the best available quantitative science will lead to more appropriate management practices than those currently being practiced. Additionally, this update should recognize the fact that science is an ever-evolving field and management practices should, at minimum, be reviewed annually to ensure that the specific needs and management goals of an allotment are being met.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Hank	Nevada State Grazing Board N2 District	NV	1471	8	General Changes to Regulations	The Board believes that flexibility in grazing management activities post-fire is a valuable and much needed tool that can be used to reduce cheatgrass densities, reduce future wildfire risk, and improve the establishment or recovery of desirable species. Currently, BLM policy places emphasis on a grazing deferral period for two years following a fire (BLM Handbook H-1742-1 pg. 36). The Board stresses that on a site-specific basis, grazing be allowed within the typical two-year deferral period. According to Foster et. al. (2015) grazing cheatgrass for two years can reduce the invasive plant's density by 64 percent using responsible grazing practices. Cheatgrass reduction allows for recovery of desirable species and ultimately stabilizes the site to allow for improved ecological function. Regulation stipulating site-specific flexibility post fire is of utmost importance to stabilize burned areas while proactively preventing future fires. The Board requests that any management decisions made after wildfire be based on the site itself, since it is impossible to effectively manage an individual area under the current regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Singleton	Annette	Summit		1305	6	General Changes to Regulations	The BLM's grazing regulations should be updated to better accommodate rotational grazing (also known as deferred grazing, rest-rotation grazing, and other terms). Rotational grazing significantly benefits rangeland health livestock and has successfully been implemented on a large scale at several sites in Utah. Projects such as the Three Creeks Grazing Improvement Project in Utah's Rich County can be designed to enhance forage for livestock, improve wildlife habitat, and protect water quality. Rotational grazing is also an effective way to maintain existing levels of AUMs in situations where rangeland health deteriorates due to drought, overuse by wild ungulates, or other conditions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Robinson	John	Idaho Conservation League	ID	1341	5	General Changes to Regulations	<p>The BLM should schedule grazing rotations in such a manner that the targeted grazing offers the best chance of reducing invasive plants, such as spring prior to cheatgrass maturation and curing. One element for the BLM to consider is the incorporation of real time monitoring and the establishment of triggers set for adaptive management and livestock rotation at appropriate times to avoid excessive soil and native vegetation impacts. We also recommend the agency establish a long-term monitoring program that can help inform future targeted grazing efforts and document the effectiveness of the proposed actions for reducing invasive plants. The excessive production of invasive fine fuels will perpetually continue unless the BLM takes proactive management direction to re-establish a native vegetation complex. We recommend the BLM include an analysis that identifies strategic areas where native vegetation has the best chance of re-establishing viable populations. We recommend the agency plant natives in small batches following fuel reduction in favorable areas, and protect these areas as necessary from initial grazing, then overgrazing as needed. See management recommendations below for reducing cheatgrass: Best Management Practices to Limit Cheatgrass 1. Clean vehicle and boots when working in different sites to avoid transfer of hybrid germplasm of cheatgrass and other exotic plants. 2. Quarantine or contain livestock for 3 days before moving them to a new area to avoid the transfer of hybrid germplasm of cheatgrass and other exotic plants. 3. Avoid soil surface disturbance that creates a seedbed for cheatgrass. 4. Avoid soil surface disturbance when silty soils are dry and most susceptible to disturbance. 5. Use minimum till drills when seeding. 6. Avoid the use of rangeland drills or disking since this soil disturbance promotes cheatgrass. 7. Limit access to those roads and trails that are signed as open. 8. Close areas to open/unlimited OHV use. 9. Start fall grazing only after soil moisture is established by fall rains to decrease soil disturbance. 10. Use winter grazing when possible and limit spring and summer grazing. 11. Allotments not meeting S & G's should be closed and rested. 12. Change all allotments from an annual grazing system to a rest rotation system, to allow native plants to occasionally set seeds. 13. Manage allotments for the benefit of biological soil crusts. 14. Manage allotments to benefit native perennial grasses. 15. Remove feral horses. 16. Stop water hauling and turn off the water pipelines. Restoration of Arid Lands 1. Conduct active restoration only in areas that do not have high natural recovery rates. 2. Use more passive restoration post-disturbance, such as after fire, but rest burned areas longer than two seasons. 3. Conduct active restoration only in areas that experience a high burn intensity. Many areas would be better off without the disturbance of attempted rangeland drill</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Blackburn	Dennis	Wayne County Commission		1363	2	General Changes to Regulations	<p>The BLM should empower its range personnel to make rapid, science-based decisions to authorize early on dates or late off dates, as conditions allow. The NEPA analysis for a BLM 10-year grazing permit should consider the environmental impact of early on dates and late off dates during favorable years, so that no additional NEPA analysis would be necessary to authorize such flexibility when favorable conditions occur. Similarly, Temporary Non-Renewable ("TNR") Animal Unit Months ("AUMS") should be readily available as a tool to managers when favorable precipitation events occur, when successful fire rehabilitation happens, or when range improvement projects take place. If needed, a programmatic Environmental Impact Statement ("EIS") for all of the BLM should be conducted to make TNR AUM's available for managers to use. Just as AUM's can be cut for resource protection, AUM's should also be able to just as easily increase when conditions and resources warrant it.</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bushman	Darin	Piute County	UT	1263	2	General Changes to Regulations	<p>The BLM should empower its range personnel to make rapid, science-based decisions to authorize early on dates or late off dates, as conditions allow. The NEPA analysis for a BLM 10-year grazing permit should consider the environmental impact of early on dates and late off dates during favorable years, so that no additional NEPA analysis would be necessary to authorize such flexibility when favorable conditions occur.</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Raymond	Brian	Daggett County Commission		1142	2	General Changes to Regulations	The BLM should empower its range personnel to make rapid, science-based decisions to authorize early on dates or late off dates, as conditions allow. The NEPA analysis for a BLM 1 0-year grazing permit should consider the environmental impact of early on dates and late off dates during favorable years, so that no additional NEPA analysis would be necessary to authorize such flexibility when favorable conditions occur
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bushman	Darin	Piute County	UT	1263	1	General Changes to Regulations	The BLM should consider providing livestock producers with greater flexibility regarding on-off dates on BLM grazing allotments. The ability for a livestock producer to enter a grazing allotment early if conditions allow, or to stay on the allotment beyond the "off date" if sufficient forage is available, would considerably enhance livestock grazing operations on BLM lands. When favorable weather conditions produce more forage than expected, livestock producers should be afforded the opportunity to benefit from these conditions. Flexible on and off dates during favorable years would mitigate the negative impacts suffered by livestock producers during drought years. Over time this flexibility to adapt to variable weather conditions would bring more stability to ranching operations and local economies. The BLM's regulations should be revised so that the annual operating agreements of livestock producers include an option for flexible on-off dates as conditions allow.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Petersen	Ray	Emery County, UT	UT	1313	1	General Changes to Regulations	The BLM should consider providing livestock producers with greater flexibility regarding on-off dates on BLM grazing allotments. The ability for a livestock producer to enter a grazing allotment early if conditions allow, or to stay on the allotment beyond the "off date" if sufficient forage is available, would considerably enhance livestock grazing operations on BLM lands. When favorable weather conditions produce more forage than expected, livestock producers should be afforded the opportunity to benefit from these conditions. Flexible on and off dates during favorable years would mitigate the negative impacts suffered by livestock producers during drought years. Over time this flexibility to adapt to variable weather conditions would bring more stability to ranching operations and local economies. The BLM's regulations should be revised so that the annual operating agreements of livestock producers include an option for flexible on-off dates as conditions allow.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	4	General Changes to Regulations	The BLM should consider protection of grazing pennits that are waived without preference. When a permittee retires their operation, without having someone specific to pass the pennit on to, the allotment(s) within that pennit should remain open to grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	19	General Changes to Regulations	The BLM must reevaluate how AUMs are calculated, taking into account the larger body size of modern-day domestic cattle, and the correspondingly greater forage and water requirements per cow/calf pair. At the very least, the BLM must discuss in detail its approach for calculating the area of influence of livestock. An AUM is supposed to be allocated for a 1,000-pound cow with a calf, but modern cattle are much bigger. The modern cow/calf pair requires 1.287 AUMs by this calculation. Current methods for calculating AUM are woefully inadequate, and reliance on them has resulted in numbers of domestic livestock vastly exceeding carrying capacity on public lands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	4	General Changes to Regulations	The BLM has indicated several "improvements" in two categories: streamlining opportunities and management of flexibility opportunities. Streamlining efforts are to consider different billing schedules, reduce decision issuance time, eliminate the public protest period, and increase the use of "targeted grazing authorizations" for vegetation management. BLM also proposes to "streamline" protests and appeals by expanding the use of categorical exclusions which is the shortened version of environmental analysis with fewer full and fair environmental analyses, further contributing to undermining public participation opportunities in the process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Whicker	Keven	Beaver County	UT	754	4	General Changes to Regulations	The adjustments in Animal Unit Months (AUMs) should be made to reflect the range conditions and forage availability. Temporary suspensions may be necessary at times when conditions degrade due to fire, drought or other factors. These temporary suspensions need to be restored as early as the range conditions allow. Too many times, these suspensions are not restored for many years without a plausible explanation. Likewise, when conditions are favorable in higher precipitation years, there should be temporary increases in AUMs allocated. A Temporary Non-Renewable AUM increase would be suitable and proper for abnormally good years. Furthermore, with so many fuels projects and range improvement projects being carried out, there has been an overall increase in forage availability. These increases in range productivity should be reflected in permanent increases to the overall AUM level assigned to permittees. AUM levels should be reflective of what the range has to offer both temporarily and long term.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Denice	Lincoln County, NV		1177	5	General Changes to Regulations	Temporary Non-Renewable use permits have been removed from the tool box for managing lands by administrative burdens that inhibit granting of these permits. This is an important tool for adaptive management and regulations must create a path for this important use. The current challenge is for these permits to be timely - there should be some latitude for the Authorized Officer to grant TNR under a Categorical Exclusion (or Programmatic EA).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dietz	Victoria	Washakie County Conservation District	WY	1000	1	General Changes to Regulations	Temporary Non-Renewable (TNR) permits are crucial to ensuring that forage is utilized effectively by livestock to mitigate the fuels capacity. It is important that TNR permits be available to a permittee in a timely manner and to allow the needed flexibility of grazing management during unexpected changing range conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	9	General Changes to Regulations	Temporary Non-Renewable (TNR) Animal Unit Months (AUM's) should be readily available as a tool to land managers when favorable precipitation events occur or when successful fire rehabilitation or range improvement projects are completed. If needed, a programmatic EIS for all of the BLM could be conducted to make TNR AUM's available for land managers to use. Just as AUM's can be cut for resource protection, AUM's should also be able to just as easily increase when conditions and resources warrant.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Simkins	Connie	N-4 State Grazing Board	NV	1410	10	General Changes to Regulations	Temporary Nonrenewable (TNR) TNR has been utilized for many years to temporarily adjust allotment grazing (i.e. AUMs, season of use, etc.) as an effective tool to address periods of excess forage production, exceptional precipitation years that encourage early growth and invasion of species such as cheatgrass which is recognized for the rapid spread of wildfires in the Great Basin and other regions. Renewing full authorization for TNR without first requiring an EA will greatly reduce the risk of catastrophic wildfires and encourage economic stability in the rural areas. If an environmental process is required beyond the in-office assessment, then a CE should suffice in these instances.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Bricanah	American Wild Horse Campaign	VA	966	10	General Changes to Regulations	Targeted grazing should be built into land use planning especially with the expansion of outcome-based grazing. This planning should be built into the flexibility provided with those plans. If not included in previous planning, targeted grazing should follow normal decision and impact planning with public input allowed. Allowing for longer periods (i.e. multiple years) of targeted grazing should be considered in planning if appropriate.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	37	General Changes to Regulations	Targeted grazing requires carefully timed grazing allowances and close supervision to diminish undesirable adverse effects (Bailey et al 2019). It also requires a detailed site level inventory and careful choice of grazing species and grazing windows (Taylor 2008)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris			1188	5	General Changes to Regulations	TARGETED GRAZING - This is the future of all livestock grazing. It requires that ranchers and local land use managers work cooperatively toward utilization goals. This should be written into each and every grazing permit nationwide.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris	Ninety-Six Ranch LLC		1285	5	General Changes to Regulations	TARGETED GRAZING - This is the future of all livestock grazing. It requires that ranchers and local land use managers work cooperatively toward utilization goals. This should be written into each and every grazing permit nationwide.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eisenach	Kurt	Wyoming Wild Sheep Foundation		1161	5	General Changes to Regulations	Targeted Grazing Our Foundation is generally supportive of targeted grazing concepts to assist with vegetation management. However, extreme caution must be used with type / class of livestock used for treatment. For instance, domestic sheep or goats utilized for weed control may present a high disease transmission risk for bighorn sheep if they are present in or near the allotment. We would insist that policies such as the BLM's Manual Direction MS 1730 "Management of Domestic Sheep and Goats to Sustain Wild Sheep" be utilized as part of the decision making process when considering targeted grazing. Targeted grazing often refers to practices which require higher intensity management from livestock herdsman, increased temporary or permanent infrastructure (e.g. fencing, water development), or other means to control livestock movements and focus herbivory on targeted plant species. Temporary or permanent infrastructure installed to control livestock for vegetative treatments (e.g. fence) must allow for passage by wild ungulates. Fence markers for sage grouse and other birds should also be considered on temporary and permanent fences, especially in new locations where wildlife may not be aware of the fence's location. Goals and objectives for controlling invasive plants need to be very descript and clear. In many cases, livestock grazing alone will not be an effective means of control. Utilizing integrated pest management strategies should always be considered for long term, effective control while minimizing impacts to non-targeted plant communities or species.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vincent	Randan		UT	923	4	General Changes to Regulations	Suspended AUMs We currently have suspended AUMs in nonuse. The BLM has not allowed use of these suspended AUMs for years nor have they created a review process to determine if the suspended AUMs could be reinstated. A solution would be to change the current regulation to require the BLM to review these suspended AUMs in a timely manner or reinstate the AUMs and allow them to be part of the yearly grazing review and management. Suspended nonuse AUMs create an economic burden not only for the permittee but the community.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Peter		NV	915	3	General Changes to Regulations	Streamline the grazing regulations to allow for hazardous fuels and noxious weeds like cheatgrass, to be utilized before they seed out. Allow for a sensible and practical Temporary Non-Renewable (TNR) type permit process to be used for targeted grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mayer	Christopher		NV	823	5	General Changes to Regulations	Sources of information would include monitoring and observations to include several sources of information to include but not limited to ; Utilization and use patterns across the entire area. Percent herbage use provides only one measure of grazing intensity. Amount of forage standing crop remaining at the end of the grazing cycle, b Percentages of grazed and ungrazed plants, because there is spring growth. Plant stubble heights, litter- Plant stubble heights will be established an annual basis to allow consideration of growing conditions for the growing year. Establishing a general stubble height Carry over vegetation from previous years Visual appearance. Maintain or improve plant composition objectives and the vegetative states
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	5	General Changes to Regulations	Simplifying the process for livestock crossing authorizations and non-renewable pennits and leases to allow such decisions to be effective immediately (no Proposed Decisions and Protest Periods) would reduce administrative burdens on the agency.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Agee	Marta		NV	1412	1	General Changes to Regulations	Simplify Temporary Non Renewable and allow rancher to rancher agreements be sufficient to allow fire burned out [illegible] to make use of surplus feed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ogden	Garth "Tooter"	Sevier County	UT	1499	2	General Changes to Regulations	Similarly, Temporary Non-Renewable ("TNR") Animal Unit Months ("AUMS) should be readily available as a tool to managers when favorable precipitation events occur, when successful fire rehabilitation happens, or when range improvement projects take place. If needed, a programmatic Environmental Impact Statement ("EIS") for all of the BLM should be conducted to make TNR AUM's available for managers to use. Just as AUM's can be cut for resource protection, AUM's should also be able to just as easily increase when conditions and resources warrant it.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Raymond	Brian	Daggett County Commission		1142	3	General Changes to Regulations	Similarly, Temporary Non-Renewable ("TNR") Animal Unit Months ("AUMS") should be readily available as a tool to managers when favorable precipitation events occur, when successful fire rehabilitation happens, or when range improvement projects take place. If needed, a programmatic Environmental Impact Statement ("EIS") for all of the BLM should be conducted to make TNR AUM's available for managers to use. Just as AUM's can be cut for resource protection, AUM's should also be able to just as easily increase when conditions and resources warrant it.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rosquist	Amy	Six County Association of Governments	UT	1170	3	General Changes to Regulations	Similarly, Temporary Non-Renewable ("TNR") Animal Unit Months ("AUMS") should be readily available as a tool to managers when favorable precipitation events occur, when successful fire rehabilitation happens, or when range improvement projects take place. If needed, a programmatic Environmental Impact Statement ("EIS") for all of the BLM should be conducted to make TNR AUM's available for managers to use. Just as AUM's can be cut for resource protection, AUM's should also be able to just as easily increase when conditions and resources warrant it.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Warren	Greg			1180	7	General Changes to Regulations	Should the BLM integrate flexibility in grazing schedules and stocking rates to deal with variable timing and productivity of grass fuels? The principal role of BLM in managing grazing allotments should be to ensure that commercial grazing is consistent with the direction that is found in an up to date integrated resource management plan, and at the allotment level, ensure that proper functioning conditions persist through implementing appropriate grazing schedules, stocking rates, and classes of livestock; and monitoring the effects of grazing use and modifying livestock grazing practices accordingly.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Scarbrough	Gary	Otero County Public Land Use Advisory Council	NM	1202	11	General Changes to Regulations	Section 4810 could be incorporated into and under one title. Those that are economically affected must be included as well as local governments where the standards and guidelines will apply. Counties have a vested interest in what and how something affects its citizens/residents and revenues. Language must implement consultation, cooperation and coordination with affected permittees/ lessees, the state having lands or responsibility for managing resources within the area of the allotment, and the affected counties as well as the BLM. The BLM must assess the allotment ecological conditions, site potential and social, economic and cultural considerations of affected stakeholders. The parties must jointly develop measureable objectives that focus on rangeland ecological attributes that can reasonably improve with grazing management, identify desired outcomes for allotment management and the strategy to reach those desires. Monitoring must use applicable analyses that meet basic standards of scientific defensibility to include objective, repeatable and quantitative methods by which to evaluate monitoring outcomes relative to allotment objectives. Monitoring must develop true scientific short and long term trends.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Warren	Greg			1180	2	General Changes to Regulations	Revised grazing regulations should emphasize the need to provide for rangeland health, including provisions for properly functioning watersheds, ecological process maintenance, water quality, and wildlife habitat restoration.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallwood	Lori	Big Horn County Commissioners	WY	1223	3	General Changes to Regulations	Revise regulations to provide security and assurances for permittees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	13	General Changes to Regulations	Resource Advisory Committee actions should be focused on advising BLM on large scale plans and actions vs site specific actions. As examples, we note two recent actions in the Boise District in which the BOO RAC was involved. BOO RAC was invited to attend a field trip for an action in Owyhee County regarding proposed improvements to a remote site. The proposed improvements would have potentially increased use and adverse impacts on Owyhee County, yet Owyhee County was consulted on this project after the BOO RAC. This action was inappropriate for RAC's large scale advice mission. In contrast, the BOO RAC was approached by Owyhee County to cause a review and potential revision of the Idaho Standards and Guides. County personnel presented information to the RAC which showed the need for such review and potential revision (none had been done since the Standards and Guides had been set in the 1990's) and the benefits to accrue being either a validation of current Standards and Guides or an improvement by revision. BOO RAC supported the request, but it was not supported by BLM and the request was denied.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	3	General Changes to Regulations	Requiring Transfers to be a Minimum of 10 Years instead of 3 To me this is one of the most important changes proposed for these regulations. At it's heart the Taylor Grazing act was designed to help create order and stability in the livestock industry and it's use of public lands. Unfortunately, today many land owners perpetually lease out their base property, giving it to the highest bidder every 3 years. This has the opposite effect of what the Taylor Grazing Act intended. It creates instability, and fills the range with operators who don't have a vested interest in the land they are operating on, because they know it is unlikely they will still be using it in 3 years. This has gotten so bad, that I question if leasing of base property should even be allowed, as a means to authorize a permit (I talk more about this later). However, I think this would be an excellent step to prevent the perpetual rotating door of permittees that occurs in some locations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Pauline	Otero County Cattleman's Association		1201	11	General Changes to Regulations	Reinstate "Grazing Advisory Boards" as per Section 18 of the TGA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Terry	Otero County Cattleman's Association		1201	11	General Changes to Regulations	Reinstate "Grazing Advisory Boards" as per Section 18 of the TGA.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stone	Gary	Otero County Cattleman's Association	NM	1201	11	General Changes to Regulations	Reinstate "Grazing Advisory Boards" as per Section 18 of the TGA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Peter		NV	915	1	General Changes to Regulations	Regulations should be streamlined to ensure flexibility in grazing permits allowing adaptive management as issues arrive.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	24	General Changes to Regulations	Regulations for OBG need to follow other range management decisions and actions. Permit decisions supported by public involvement and environmental analysis should not be waived. Requirements for range land health and carrying capacity limits should be followed in OBG. OBG's claims for ecological sound adaptive management need to be first validated through independent objective scientific studies. Data quality requirements and peer review procedures should be required as part of OBG in the revised regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Peter		NV	915	2	General Changes to Regulations	Recognize cheat grass and include it in stocking rate and utilization of grazing allotment.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rimmer	Karen		WY	1345	5	General Changes to Regulations	Rangelands Health Standards and Noxious Weed Management - BLM should consider revising these regulations to permit the use of grazing to address invasive plants. Livestock grazing on public lands can be utilized to reduce invasive and noxious plant, such as cheatgrass. BLM grazing regulations should allow flexibility to use grazing as a tool to reduce noxious and invasive plants on public lands. BLM should also consider under what circumstances herbicides may be used on public lands to manage invasive and noxious plants.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rimmer	Karen		WY	1345	4	General Changes to Regulations	Rangeland Health Standards and Fire Management - Wildfires in Wyoming threaten vital habitat, especially that of critical and priority wildlife habitat and private property. The limited parameters for grazing management under existing permits continue to heighten the issue. Converse County urges BLM to consider the utilization of domestic livestock grazing to reduce fuel loads and the risk of fire. Allowing permittees to access rangelands earlier in the year, when cheatgrass can be combatted using livestock grazing, could be useful in managing fuel loads.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	14	General Changes to Regulations	Range improvements should not be held hostage to permit renewals and should be owned by permittees if they provided materials and labor.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Warren	Greg			1180	1	General Changes to Regulations	Proposed new regulations if adopted must recognize the need for integrated management direction that is developed through resource management planning processes as guided by 43 CFR Subpart 1610 - Resource Management Planning. The provisions of 43 CFR § 4100.0-8 - Land use plans must be retained.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Sandra	Montana Grass Conservation Commission	MT	1386	5	General Changes to Regulations	Preference: Grazing preference parameters changed 15 years ago and has resulted in a reduction in AUMS due to inconsistent application of preference.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Scarbrough	Gary	Otero County Public Land Use Advisory Council	NM	1202	5	General Changes to Regulations	Preference was legally adjudicated to the qualified base property owned or controlled by the owner of the preference and as such, neither the Secretary of the Interior nor BLM officials have the legal authority to cancel a preference. The Grazing Regulations should always make reference to Section 3 and Section 15 of the TGA where applicable. Reinstate "Grazing Advisory Boards" as per Section 18 of the TGA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Agee	Marta		NV	1412	2	General Changes to Regulations	Policy Should be: BLM staff should always let Rancher know when they will be out on allotment and agree with a ranch family member
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Corp	CS Limmer	CS Limmer L/S Corp	WY	1430	2	General Changes to Regulations	Please withhold personal information from public view.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rathbun	Floyd	FIM Corp	NV	1284	7	General Changes to Regulations	Please use this NEPA process to reverse and repudiate Secretary Bruce Babbitt's Range Reform, disband the RAC(s), and return to the clear instructions of Congress that include the importance of manage livestock grazing for profit over many generations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Thorburn	Kim		WA	1408	2	General Changes to Regulations	Please include alternatives to expand outcome-based grazing projects and provide for clear monitoring standards for land health. Thank you again for your consideration.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Shepperson	Amy			1224	3	General Changes to Regulations	Pest such as prairie dogs and invasive weeds need to be addressed more frequently and more aggressively on Federal lands. The process to be approved for a Pesticide Use Permit is a pain and takes too long as well. Private landowners can get help from the county weed and pest and can effectively control weeds and other pests on our private and state lands, but they spread on Federal lands because we cannot obtain the necessary paperwork in a timely manner to be able of control them. This is a major problem and I'd like to see something done about it.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Sandra	Montana Grass Conservation Commission	MT	1386	2	General Changes to Regulations	Permitted use, allow more flexibility in grazing management practices: Applying different management practices to Allotments (difference season of use/turn in turn out dates, grazing rotations, implementing a rest rotation grazing plan, cross fencing, prescribed fire), rather than automatically reducing the number of authorized AUMS.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbetts	Ron	Prairie County Cooperative State Grazing District	MT	1391	2	General Changes to Regulations	Permitted use, allow more flexibility in grazing management practices: Applying different management practices to Allotments (difference season of use/turn in turn out dates, grazing rotations, implementing a rest rotation grazing plan, cross fencing, prescribed fire), rather than automatically reducing the number of authorized AUMS. -Allow prescribed fire to become a more widely used management practice. Prescribed fire reduces fine fuel loads and reduces probability of a catastrophic wildfire. Reducing expenses and increasing forage capacity both for domestic livestock and wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mori	Pete	Mori Ranches, LLC	NV	1440	1	General Changes to Regulations	-permits need to have flexibility to have turn out and removal as climate and conditions dictate. This means Jane 1 - Dec 31 date on permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	449	4	General Changes to Regulations	Permit and Lease Renewals and Transfers should not be categorical exclusions that eliminate public review and comment under NEPA. There must be scientifically-based evaluations of range conditions and permittee compliance before lease renewals and transfers. Reduction of administrative time and effort on lease renewals or transfers is not a justifiable change that can allow public lands to degrade.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eisenach	Kurt	Wyoming Wild Sheep Foundation		1161	8	General Changes to Regulations	Permit and Lease Flexibility Class and type of livestock is important to define here, if part of the reason for adjusting timing is to better match plant phenology with the grazing animal's preference for the plant, specifically for "targeted grazing". Some season of use changes proposed are likely to be on the front end / early spring portion of the grazing season, and may create increased direct competition between livestock and wildlife for forage resources and space, may impact nesting habitat for songbirds, sage grouse, or other. Wild ungulates and nesting birds (game and non-game) should be accommodated with potential seasonal changes in grazing timing. We would encourage BLM to utilize field staff to assess conditions very closely prior to, during, and post grazing period to ensure goals and objectives are being met, and at minimal consequence to wildlife. Conflict can occur and lead to negative results if the wrong class/type of livestock is utilized (e.g. domestic sheep or goats in bighorn sheep occupied habitats).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	14	General Changes to Regulations	Percent Public Land The modern grazing regulations should clarify how percent public land should be used with a permit. This is a fairly important topic, but isn't discussed at all in the current grazing regulations (other than that %PL is an "other term and condition"). Clarifying if State leases should be included in %PL, and if the BLM should accept the forage values provided by the state at face value, or if some other method should be used to determine credit for forage? When and how should BLM accept data provided by permittees, or the NRCS related to forage production on private land. If an allotment is not meeting rangeland health objectives, should changes be made to %PL first, before adjusting BLM AUMs? Clarifying all of these points should be addressed in the modern grazing regulations so that all BLM offices handle this situations in a uniform manner.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ruch	Jeff	PEER		1131	4	General Changes to Regulations	PEER urges BLM to develop a means to incorporate staff feedback, on a confidential basis, into any planning for grazing regulatory changes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Sabrina		NV	798	1	General Changes to Regulations	Outcome based grazing: This is an initiative that needs to be more widely implemented, but with far fewer restrictions. Cutback on the number of meetings, etc. Use technology to help the communication between the land user and the range con. Virtual check-ins, photos/videos of checkpoints and measuring sites. This is the kind of grazing idea that land users have been hoping for decades. We know what we want the range to do, produce, provide sustainability for years to come, protect resources and wildlife and this gives us the flexibility to help “design” the rotations and uses that can achieve that. Each allotment is different and using a broad blanket set of guidelines from the 1990s is not sound science or good practice.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Whicker	Keven	Beaver County	UT	754	1	General Changes to Regulations	One of the greatest issues public land grazers have in dealing with the BLM is the difficulty of renewing their permits. Frequently, we hear of permittees waiting for 10 years and longer for their permits to be renewed. This is unacceptable. Permit renewals must be done in a timely manner and unless significant impacts are identified, they should be given a Categorical Exclusion under the NEPA process. The excessive amount of time it takes to do an Environmental Assessment (EA) on permit renewals is completely unnecessary when they will nearly always result in a Finding Of No Significant Impact (FONSI).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Jen			1241	6	General Changes to Regulations	Offer incentives for retirement of grazing permits. Raise grazing fees to be more in line with national averages and assure a fair return when public resources are used in private profit-making enterprises. Private economic interest should not be put above the public property right interest. An AUM was \$2.31 in 1981 and is \$1.35 today.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klein	Tammy	Central Valley and Penasco Soil and Water Conservation Districts	NM	1144	10	General Changes to Regulations	Objectives by definitions must be measurable or proven rangeland science and data used to ensure the allotment objectives are met. Cooperation, consultation and coordination must be included with permittees and lessees. BLM actions and decisions must have data to make the right decisions to the sustainability of multiple uses and stabilize each ranch and the livestock industry.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mayer	Christopher		NV	823	4	General Changes to Regulations	Objectives and Monitoring Objectives will be established to allow consideration of growing conditions for the period of grazing or the growing year. Establishment of objectives as well as monitoring for objectives would be based on factors such as; amount of forage standing crop remaining at the end of the grazing cycle across the use area as a whole. Stocking levels and areas of grazing use will be established on an annual basis to allow consideration of growing conditions for the growing year.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	5	General Changes to Regulations	Non Renewable Permits and Leases While I like the idea of allowing decisions related to non-renewable permits to be issued effective immediately, the bigger hurdle to using things like Temporary Non Renewable permits is the need to analyze the use under NEPA. Clarifying how this would play into the process will be critical in these grazing regulations. Should BLM issue blanket NEPA documents that describe the conditions that would allow for the use of Temporary Non-Renewable permits, and then the BLM would only need to do a DNA and issue a decision effective immediately? Or will a site specific NEPA analysis be required any time Temporary Non Renewable permits are issued? If the latter is the case, decreasing the Decision implementation window will do little good to help, if a NEPA document that takes 60 - 90 days to complete is required.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eisenach	Kurt	Wyoming Wild Sheep Foundation		1161	4	General Changes to Regulations	Non Renewable Permits and Leases We are supportive of this opportunity to streamline process for one-time needs, such as land treatments. Criteria needs to be established for when non-renewable authorizations will be used.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris			1188	4	General Changes to Regulations	NON RENEWABLE PERMITS AND LEASES - Every grazing permit should have these provision built in so that the authorizing officer can act to address conditions on the ground. This is exactly the focus and purpose of President Trump's December 2018 executive order. Unless local land use managers can act to proactively treat conditions on the ground and work in real time on cooperative solutions to fuel/water/use issues, we will never get ahead of the fire danger that remains in the west.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eisenach	Kurt	Wyoming Wild Sheep Foundation		1161	7	General Changes to Regulations	Non Renewable Permits and Leases Criteria needs to be developed on what is a "qualifying event" on the landscape where non-renewable permits may be used to address the resource concern
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	8	General Changes to Regulations	No trailing permit should be required when a rancher is moving livestock on their own allotment regardless of whether trailing is occurring during permitted use dates or not.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Jen			1241	8	General Changes to Regulations	No chaining, removing or burning trees to open up more land for grazing. This results in loss of wildlife habitat and can spread invasive weeds. Instead, limit livestock numbers and focus on range improvements in current areas that have been damaged.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Scarborough	Jim		WA	26	2	General Changes to Regulations	New regulations should reduce categorical exclusions and devote increased energies toward environmental assessments and environmental impact statements for decision-making; with enhanced public notification, participation, and input. Management decisions should be made in the context of climate change with an overarching goal toward carbon sequestration in soils. Habitat value for native species must be preserved and enhanced, while conserving and augmenting native predator populations. BLM should directly account for listed and sensitive species, while robustly assessing the contribution of livestock grazing to cheatgrass spread and accelerated fire cycles. Native vegetation must not be degraded for livestock forage in any way, shape, form, or manner. Standards should be reviewed regularly in order to incorporate new peer-reviewed research in management decisions. Obviously, water quality must be monitored and improved in all cases. Grazing fees should be significantly increased in order to ensure that the taxpaying public is receiving satisfactory returns to the U.S. Treasury. Grazing in designated Wilderness or Wilderness Study Areas should be actively discouraged if not eliminated entirely. Finally, indigenous land claims and environmental justice issues must be fully addressed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	449	2	General Changes to Regulations	New regulations should allow for grazing permit retirement and long-term non-use for conservation purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	6	General Changes to Regulations	NCA requests that the regulations provide no mechanism for new forage banks to be established and further prevents the continuation of existing forage banks. Forage banks provide for unsafe fuel loading, resulting in increased fire risk to not only that allotment/pasture, but adjacent allotments and private property. When allotments are not in use, infrastructure deteriorates, resulting in decreased availability of water for wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Courtney	Tom	Missouri River Basin St. Coop Grazing District	SD	1476	1	General Changes to Regulations	More Responsive to weather events when it comes to grazing numbers.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834		General Changes to Regulations	Many land management projects occur in similar ecosystems or within areas included in programmatic National Environmental Policy Act (NEPA) analysis. Often these projects have the same projected impacts and outcomes. Agencies should be required to use previous studies, decisions, and analysis such as programmatic analyses to reduce repetition and lengthy, unneeded analysis. Many decisions such as grazing permit renewals or range livestock infrastructure projects should be analyzed through a Determination of NEPA Adequacy or Categorical Exclusion (CX) as similar projects have been analyzed and found to have no significant impact. Subsequent projects with similar impacts should refer to these analyses. Allowing the agency to renew grazing permits under these authorizations will streamline the process, assist with current workloads, and work to limit the expensive and burdensome sue and settle cycle with environmental groups. However, BLM should not lump multiple allotments together to reduce the overall amount of requisite analysis. Site specific analysis is a crucial component to understanding rangeland health and the condition of a single pasture is often not indicative of the overall rangeland health on a landscape scale. As such, BLM should avoid extrapolating data of a single pasture to justify blanket restrictions on an allotment or landscape scale.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bushman	Darin	Piute County	UT	1263		General Changes to Regulations	Livestock grazing is a safe, sustainable, cost effective, and low impact method of hazardous fuels removal that, when used correctly, can have many advantages over other fuel-removal methods, such as mechanical treatments or prescribed burns. Livestock producers benefit when able to use their livestock to reduce hazardous fuels because forage that may otherwise go unused is utilized. The BLM should facilitate the use of livestock to reduce hazardous fuels in both rural areas and in the wildland-urban interface. Highly developed areas on the urban fringe are often the most susceptible to damage from catastrophic wildfires, and livestock can help protect the urban fringe with minimal visual or auditory impact on surrounding communities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Blackburn	Dennis	Wayne County Commission		1363		General Changes to Regulations	Livestock grazing is a safe, sustainable, cost effective, and low impact method of hazardous fuels removal that, when used correctly, can have many advantages over other fuel-removal methods, such as mechanical treatments or prescribed burns. Livestock producers benefit when able to use their livestock to reduce hazardous fuels because forage that may otherwise go unused is utilized. The BLM should facilitate the use of livestock to reduce hazardous fuels in both rural areas and in the wildland-urban interface.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lyons	Scott	Box Elder County Commission		1140		General Changes to Regulations	Livestock grazing is a safe, sustainable, cost effective, and low impact method of hazardous fuels removal that, when used correctly, can have many advantages over other fuel-removal methods, such as mechanical treatments or prescribed burns. Livestock producers benefit when able to use their livestock to reduce hazardous fuels because forage that may otherwise go unused is utilized. The BLM should facilitate the use of livestock to reduce hazardous fuels in both rural areas and in the wildland-urban interface. Highly developed areas on the urban fringe are often the most susceptible to damage from catastrophic wildfires, and livestock can help protect the urban fringe with minimal visual or auditory impact on surrounding communities.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Petersen	Ray	Emery County, UT	UT	1313		General Changes to Regulations 6	Livestock grazing is a safe, sustainable, cost effective, and low impact method of hazardous fuels removal that, when used correctly, can have many advantages over other fuel-removal methods, such as mechanical treatments or prescribed burns. Livestock producers benefit when able to use their livestock to reduce hazardous fuels because forage that may otherwise go unused is utilized. The BLM should facilitate the use of livestock to reduce hazardous fuels in both rural areas and in the wildland-urban interface. Highly developed areas on the urban fringe are often the most susceptible to damage from catastrophic wildfires, and livestock can help protect the urban fringe with minimal visual or auditory impact on surrounding communities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bushman	Darin	Piute County	UT	1263		General Changes to Regulations 6	Livestock grazing can also be used as a tremendous tool to treat invasive species. Invasive plants in the western United States including cheatgrass, phragmites, and others have been successfully treated in defined areas through livestock grazing. Using livestock for invasive weed management is cost effective and has less of an impact than other weed management methods, such as the use of heavy equipment or chemical herbicides. Livestock producers also benefit from the use of additional feed provided by the invasive species. Invasive species are a growing problem on western range lands, and threaten the integrity of watersheds, wildlife habitat, and a variety of natural ecosystems. Livestock permittees should be utilized to combat these threats as true partners in range conservation and stewardship.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Singleton	Annette	Summit		1305		General Changes to Regulations 5	Livestock grazing can also be used as a tremendous tool to treat invasive species. Invasive plants in the western United States including cheatgrass, phragmites, and others have been successfully treated in defined areas through livestock grazing. Using livestock for invasive weed management is cost effective and has less of an impact than other weed management methods, such as the use of heavy equipment or chemical herbicides. Livestock producers also benefit from the use of additional feed provided by the invasive species. Invasive species are a growing problem on western range lands, and threaten the integrity of watersheds, wildlife habitat, and a variety of natural ecosystems. Livestock permittees should be utilized to combat these threats as true partners in range conservation and stewardship.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Petersen	Ray	Emery County, UT	UT	1313		General Changes to Regulations 7	Livestock grazing can also be used as a tremendous tool to treat invasive species. Invasive plants in the western United States including cheatgrass, phragmites, and others have been successfully treated in defined areas through livestock grazing. Using livestock for invasive weed management is cost effective and has less of an impact than other weed management methods, such as the use of heavy equipment or chemical herbicides. Livestock producers also benefit from the use of additional feed provided by the invasive species. Invasive species are a growing problem on western range lands, and threaten the integrity of watersheds, wildlife habitat, and a variety of natural ecosystems. Livestock permittees should be utilized to combat these threats as true partners in range conservation and stewardship
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Whicker	Keven	Beaver County	UT	754		General Changes to Regulations 7	Lastly, we would like to see the regulations adjusted to allow for Rotational Grazing. This practice is employed to defer grazing on pastures to enhance forage growth and improve rangeland health. Allowing this option requires some level of flexibility in moving livestock within an allotment, however the results are a win-win for permittees and the range itself.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schickedanz	Jerry			1244	7	General Changes to Regulations	LANDSCAPE SCALE MANAGEMENT emphasis has left vital allotment planning without good monitoring data for local levels. Good allotment management plans cannot be derived from broad survey instruments. We have come full circle in data gathering from when FLPMA 1976 first attempts at grazing EIS was on a national and then state wide basis and finally done on allotment by allotment basis. Trying to manage from 30,000 feet on a single allotment is not feasible. BLM has a good basis for determining "trend" with their on the ground allotment monitoring techniques and it must be continued. To reduce monitoring to a human value system of rangeland health with just checking the box on what it looks like is unacceptable. Proper range management needs scientific and quantitative data to back up the decision making.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eisenach	Kurt	Wyoming Wild Sheep Foundation		1161	10	General Changes to Regulations	Land Health Flexibility in grazing schedules and stocking rates should be considered when attempting to manage invasive species, including cheatgrass. However, it is also important that adequate rest and recovery opportunity for native, perennial forages (herbaceous and woody) are also emphasized, particularly during the growing season. In many BLM pastures/allotments, infrastructure is lacking to conduct "targeted grazing" and will require additional labor by the permittee to achieve desired results. In targeted grazing situations, it will be imperative that adequate monitoring is completed pre, during, and post treatment to ensure desired objectives are being met. Plant phenology and plant palatability may change very quickly, resulting in non-targeted plant species being excessively used. In the case of invasive annual grasses, targeted grazing by itself has not proven to be an effective means of long term control in many instances. However, used in conjunction with property timed and applied herbicides, grazing can be an effective tool to reduce plant matter that may intercept herbicide prior to herbicide treatment. Carefully planned livestock grazing management can prolong the benefits of herbicide applications by providing adequate rest and recovery periods during the growing season to allow for native, perennial vegetation re-establishment and will allow for native vegetation to naturally outcompete invasives in the future. We highly recommend the utilization of integrated pest management strategies to control invasive plants, and that livestock grazing is not seen as the only potential method of control.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Ade	Kane County Commissioners	UT	1141	9	General Changes to Regulations	Kane County would like to recommend that the BLM update grazing regulations to allow local field offices the flexibility to identify areas that would benefit from the use of livestock and grant local BLM managers the authority to coordinate and cooperate with state and local governments, private landowners, fire departments, livestock producers, and other federal agencies when making decisions to allow targeted grazing in areas of need
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	O'Brien	Robert		UT	890	2	General Changes to Regulations	It is time consuming to monitor and evaluate and make sure that Healthy Land standards are met – but this should be a major role of the BLM. Again, these are public lands, and we should make sure that they are being treated well. I would not curtail, but urge you to enhance such monitoring and evaluations and make sure that standards are met.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950	9	General Changes to Regulations	It is proposed that the Governor, of each affected and interested state, commission the establishment of a Land Claims Board that consists of the following membership; Chairman to be appointed by the Governor of the state from a list submitted from allotment and surface rights owners, that reports directly to the Governor and insures the processes set forth for the orderly conduct of the said board is accomplished to the benefit of the citizens of the state. State Engineer's office to have a member assigned to the board to represent the interest of the state in any such issues heard by the board. State Attorney General Office to have a member assigned to ensure all legal issues presented are vetted and followed to ensure proper due process for any claimant in such proceedings. U.S. Department of Interior to have one member, rotated and commensurate to the specific agency impacted by the claimant's submission. State County representative, to have one member assigned, designated by the individual county Commissioners, and rotated and commensurate to the county impacted by the Claimant's submission. State Grazing Board, if applicable, to have two members assigned, on a rotational basis, from an area board not associated to the specific area impacted by the Claimant's submission and claim. And finally, one individual citizen rancher and surface owner not recognized by the DOI component as having any existing rights prior to the implementation of this program and appointed by the Governor of the state for a term certain set by the Governor.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yardley	Merrill		UT	884	1	General Changes to Regulations	It is not equitable or feasible to force grazing livestock to assume complete responsibility for the range degradation due to overgrazing and use by all other ungulates. Therefore, in updating grazing regulations, provisions must be made to harmonize wildlife use with livestock use when evaluating rangeland health and provide each species with equal accountability for rangeland health without further reduction of the historic use of the land for livestock production
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950	13	General Changes to Regulations	It is further proposed that any administrative action(s) by any component of the Department of Interior against any prospective Claimant shall be continued (tolled) until such time as the claim is validated through the below described process.[10] The tolling of any action shall require that the Claimant provide to the organization or governmental body, written notice of his/her intent to file a claim in accordance with such provisions detailed below. The "notice of intent" shall be time sensitive as to the filing of the claim before the Land Claims Board to allow for no more than 60 days to file such a claim. The said sixty (60) day constraint of time, is also subject to the creation of and start date of the Lands Claims Board within the individual states at the discretion of the Governor of the applicable state. The Department of Interior shall be required to provide written notification to the Claimant of receipt of his "notice of intent" and affirmatively assert that any and all administrative actions directly associated to the subject claim are "stayed" until resolution and a final decision on the matter is issued by the said state Land Claims Board. If the Claimant fails to accomplish the filing of the claim before the board, administrative action(s) shall proceed as if no claim had been filed and the prospective Claimant, based on the failure to file, would waive the right to file a claim in the future. [10] administrative actions could include, but are not limited to, termination of a grazing right or privilege, re-assignment of a grazing allotment to another party or any action in controversy before the Interior Board of Land Appeals (IBLA).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950	10	General Changes to Regulations	It is envisioned that the above composition of the Lands Claims Board would consist of a Chairman with seven (7) working and voting members to validate the claim submitted for review. In any case in which an individual shall elect to recuse themselves from voting on a matter due to a conflict of interest, the Chairman may, in the event of a tie vote, enter the deciding vote on the issue presented in the claim. In addition, the Claimant shall possess the right to one (1) un-contested preferential challenge towards a member of the Land Claims Board requiring the assignment of an alternate to replace the member so challenged. In the event of such a challenge, the time is tolled until the reconvening of the board in hearing the matter.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goicoechea	Julian	Cross 7 Livestock, LLC/Goicoechea Ranches-Eureka	NV	928	2	General Changes to Regulations	It is crucial for the regulations to mandate reliance on current rangeland science - Ecological Site Descriptions (ESD) and their associated State and Transition Models/Disturbance Response Groups to inform objectives and differing levels of grazing allowed. An understanding and description of the ecological shifts or transitions that have occurred due to disturbance, such as wildfire, or legacy management are imperative in order to frame management objectives under any grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlson	James	Montana Natural Resource Coalition		1342	11	General Changes to Regulations	Issue: Application of lessons learned from historical adverse events grazing policy Explanation: BLM has experienced some significant adverse events related to grazing policy since 43 CFR § Part 4100 was last revised. The current rule should be reviewed in the context of lessons learned from those incidents, and development of alternatives for the EIS should be informed by the lessons learned so that similar future events may be avoided. Criteria: NEPA/CEQ: 42 USC § 4331, Congressional declaration of national environmental policy - "(a) The Congress ... declares that it is the continuing policy of the Federal Government, in cooperation with State and local governments... to use all practicable means ... to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of ... Americans." 40 CFR § 1500.2 - "Federal agencies shall to the fullest extent possible: ... (e) Use the NEPA process to identify and assess reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment. (f) Use all practicable means ... to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment." 43 CFR Part 4100: 43 CFR § 4100.0-2 - "The objective of these regulations [is] to ... provide for the sustainability of the western livestock industry and the communities that are dependent upon productive, healthy public rangelands." 43 CFR Subparts 4140 and 4150 - compliance is a focal source of some noteworthy events, providing opportunities for improvement to the regulations that are fully sensitive to the needs of both the natural and human environments. TGA: 43 USC § 315 - "... to promote the highest use of the public lands ... the Secretary of the Interior is authorized ... to establish grazing districts ... which are ... chiefly valuable for grazing and raising forage crops ..." 43 USC § 315a - "The Secretary of the Interior shall ... make such rules and regulations ... to insure the objects of such grazing districts,... to regulate their occupancy and use, ... to provide for the orderly use, improvement, and development of the range; ..." PRIA: 43 USC § 1901(b) - "(b) The Congress hereby establishes and reaffirms a national policy and commitment to: ... (2) manage, maintain and improve the condition of the public rangelands so that they become as productive as feasible for all rangeland values in accordance with management objectives and the land use process established pursuant to section 1712 of this title; ... (c) The policies of this chapter ... shall be construed as supplemental to and not in derogation of the purposes for which public rangelands are administered under other provisions of law." FLMPA: 43 USC § 1712(a) - "The Secretary shall ... develop, maintain,

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Sandra	Montana Grass Conservation Commission	MT	1386	6	General Changes to Regulations	Isolated tracts: There are 40- and 80-acre tracts of BLM land within private lands that should be sold off. These custodial lands do not do anyone any good and are a hindrance to a successful partnership and successful business practices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mayer	Christopher		NV	823	5	General Changes to Regulations	Information Based Range / Livestock Management Approach An information based range management approach could be applied associated with the authorization of grazing use. Various measures of grazing intensity as described below will be the primary means to evaluate if stocking levels are in balance with the forage resource. Grazing use for the grazing season or period is based on anticipation of forage production, availability and condition . This will include not only forage by allotment but also by areas within an allotment and rangeland health conditions which may or may not change. Carrying capacity and management strategies ie areas of use, timing of use rotation of areas of use must require flexibility because these are influenced and based on variability in forage production in any given year. Livestock movement and timing will be set on an annual basis based on the local conditions for each grazing year. Stocking levels would also be established considering previous years grazing areas, grazing patterns etc.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Warren	Greg			1180	6	General Changes to Regulations	In what ways can livestock grazing be used to reduce wildfire risk and improve rangeland health? Traditional cattle and horse grazing allotment grazing activities would have very limited effects on reducing wildfire threats. Commercial livestock grazing is not associated with improving rangeland health; however, in limited cases commercial livestock grazing has been used in an attempt to replicate the effects of bison grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rappaport	Alexandra		NV	269		General Changes to Regulations	In the following comment I propose ways to increase the regulations for ranchers as this is in the public's best interests. Allow for grazing permit retirement and long-term non-use for conservation purposes. Create no new categorical exclusions and expand use of EAs and EISs. Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. This is American land, we as Americans deserve to know what is going on with it. Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. Help solve the climate crisis not contribute to it more. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Thereby improving the natural health of the land and helping solve the man-made extinction crisis. Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. We are experiencing an increase in deadly wildfires and are feeling the effects especially in California where my mom lives. We need to figure out all factors in this crisis and honestly move to mitigate these causes. This is not time to put any individual economic needs over the needs of the American people's survival. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations since grazing animal runoff of chemicals and manure can greatly decline water health. Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. We need to know the real costs of grazing. The real costs that the public is paying through environmental disaster. Disclose underlying Indigenous land claims and address environmental justice issues. We need justice for the First Americans. This was their land and we should always respect and consider their needs and rights first. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions. Set a fair and equitable grazing fee based on comparable private land prices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950		General Changes to Regulations	In the event that the Claimant is successful in any court of competent jurisdiction, the Land Claims Board shall be bound by the decision of the Court and the record of the proceedings shall reflect the decision of the Court. All costs associated to the litigation incurred by the Claimant shall be paid by the Department of Interior, component thereof, or the opponent party(s) in controversy in the litigation [9] in addition to any other damages directed by the said Court. [9] Equal Access to Justice Act (EAJA), codified under 5 U.S. C.§ 504 and 28 U.S. C. §2412, see also Astrue v. Ratliff, 130 S. Ct. 2521 (June 14, 2010).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950		General Changes to Regulations	In the event of any decision of the Land Claims Board, the Claimant may elect to appeal the decision of the board to the below described proposed U.S. COURT OF PRIVATE LANDS CLAIMS. In addition, the Claimant may voluntarily decide to engage in litigation before either a State Court or the U.S. District Court in order to settle any dispute involved in or associated to the said claim. In this event, the Board shall issue a "right to sue" letter to the Claimant and any time shall be tolled in making or ruling on the matter before the said body until such time as such issues are decided in the court, possessing subject matter or personal jurisdiction over the case, of the Claimant's choice.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ohs	Brian	Montana Stockgrowers Association		1163	7	General Changes to Regulations	In conclusion, grazing regulations following the changes to the CFRin 1995 have not been particularly good for Montana ranching businesses or the BLM. For example; the. 1995 reforms have hindered the BLM's ability to address and control wildfire. This has adversely affected range health, thousands of acres of Sage-Grouse habitat and millions of dollars of both public and private property.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950	16	General Changes to Regulations	In addition, any decision from the Land Claims Board resulting from the Claimant's submission to the Board and requiring any inclusion in the data base, shall require written notification of such a ruling and action by the Board. As a result, the Board shall be required to provide to the Claimant, a certified ruling of the Board as proof to affirmation of the Claimants submission setting forth the specifics and particularity of circumstances as to the affirmed claim and recognition of such by the state in which the claim is located and the federal government. Any such certified ruling shall be countersigned by the Secretary of Interior, or his/her assigned designated officer and by the Governor, or his/her assigned designated officer, of the state in which the claim resides.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rathbun	Floyd	FIM Corp	NV	1284	3	General Changes to Regulations	Implement Targeted Grazing based on permittee recommendations. Our example is the use of our sheep, which are herded on open range, to accomplish target goals.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rathbun	Floyd	FIM Corp	NV	1284	4	General Changes to Regulations	Implement Outcome Based Grazing for all permits. The historic outcomes of grazing within our Great Basin rangelands has included greatly increased production of vegetation that in turn provides forage for livestock and wildlife as well as wildlife habitat components; greatly increased numbers of all wildlife species peaking in about 1960; recreational opportunities that depend on rancher developed roads and water sources as well as rancher stimulated increases of wildlife populations; and substantial benefits to local and state wide economy through retail purchases, labor wages, community involvement, taxes, etc.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bentz	Linda			1238	2	General Changes to Regulations	Immediate rehabilitation response after fires to help the ecosystem recover, using the necessary tools available such drilling, seeding and chemical treatments to reestablish perennials. In conjunction, using grazing to reduce fuel loads on those burned areas at the appropriate time.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Robinson	John	Idaho Conservation League	ID	1341	8	General Changes to Regulations	If there are some currently ungrazed areas that could be suitable for responsible livestock grazing, the BLM first needs to detail the specific environmental impacts of such actions and describe how the agency can meet rangeland health standards given the low success rate at existing allotments. One option that should be developed further is the use of grass banks to serve as temporary allotments in the event that an allotment is unavailable due to wildfire.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klitz	Karen			1449	4	General Changes to Regulations	If the BLM is going to change grazing regulations, it should prioritize healthy habitat for wildlife and the public. This would fulfill the BLM mission "to sustain the health, diversity, and productivity of public lands for the use and enjoyment of present and future generations." Productivity does not mean for human extraction only, and where the interests of human extraction and wildlife habitat conflict, the BLM should support the public interest of protecting the health of the land. New regulations should: * Create no new categorical exclusions and should expand the use of EAs and EISs. * Require the use of the best available science in livestock grazing decisions . * Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. * Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. * Ensure that grazing management preserves the habitat value for native plant and wildlife species. * Ensure that grazing management does not impede grazed lands from serving as habitat for native predators, a valuable actor in all ecosystems. * Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. * Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. * Forbid de struction of native vegetation to increase forage for livestock. * Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. * Include water quality monitoring as part of theland health evaluations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cerri	Ronald		NV	1060	2	General Changes to Regulations	If targeted grazing is implemented it should never be based upon hard off and on dates as plant growth varies area to area and year to year. Grazing regulations should allow flexibility based on feed availability and not on permit dates, terms, and conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sparks	Tom		MT	1110	4	General Changes to Regulations	If competing use for federal land (i.e. recreational uses) desiccate the rangeland, there should be compensation for it to the permittee whose forage is violated.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Morrison	Colleen		IL	1006	5	General Changes to Regulations	If BLM is going to change the grazing regulations, they should be improving them for the benefit of the native plants and animals and the environment and public use not for the extractive and cattle industries.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riffe	Adele		CO	658		2 General Changes to Regulations	If BLM is going to change the grazing regulations, I suggest they improve them for the benefit of the myriad plants and animals that depend on these PUBLIC lands and for non-extractive users. - Create no new categorical exclusions and expand use of EAs and EISs. - Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. - Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. - Forbid destruction of native vegetation to increase forage for livestock. - Include water quality monitoring as part of the land health evaluations. - Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. - Require use of the best available science in livestock grazing decisions. - Set a fair and equitable grazing fee based on comparable private land prices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wardlaw	Tricia		OR	976		1 General Changes to Regulations	If BLM is going to change the grazing regulations, I suggest that you improve them for the benefit of the myriad plants and animals that depend on these public lands and Wilderness areas. Any new regulations should: • Allow for grazing permit retirement and long-term non-use for conservation purposes. This is especially important in the nearly 5 million acres of designated Wilderness on BLM administered lands that are currently open to livestock grazing. • Create no new categorical exclusions and expand use of EAs and EISs to facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. • Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis, while ensuring grazing management preserves the habitat value of grazed lands for native plant and wildlife species and does not impede grazed lands from serving as habitat for native predators. • Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions and forbid destruction of native vegetation to increase forage for livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ocean	David		CA	973		7 General Changes to Regulations	If BLM is going to change the grazing regulations, I suggest that you improve them for the benefit of the myriad plants and animals that depend on these public lands and Wilderness areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Snyder	Todd		CA	869		2 General Changes to Regulations	If BLM is going to change the grazing regulations, I suggest that you improve them for the benefit of the myriad plants and animals that depend on these public lands and Wilderness areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Prunty Rianda	Kyla		NV	902		5 General Changes to Regulations	I would like to see Outcome Based Grazing implemented more widely and in our permit as well. I believe that there is no dispute that this approach can become a standard practice that effectively achieves the goals of the producer and the BLM. Please make this available to permittees.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Pearson	Tammy		UT	1065	2	General Changes to Regulations	I would like to echo the sentiments of the Public Lands Council, the Utah Association of Counties and the remarks made by the Utah Department of Agriculture and Food. I believe there needs to be much more flexibility in the On/Off dates for permittees to take advantage of favorable conditions. I would also like to recommend the use of Temporary Non-Renewable AUMs for short term increases when conditions allow. I insist that permit renewals be made in timely fashion. Waiting for years for the renewal is unacceptable. I believe most of these renewals could be made with a Categorical Exclusion and encourage this modification to your rules.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cape	TJ		MT	1173	1	General Changes to Regulations	I understand that in some areas leasees are not allowed to turn in until sometime in June. If you want to battle cheat grass, it would be better to turn in before the cheat grass goes to seed. While it is still green, cows can actually eat it with no problem and get some good out of it, thus reducing the harmful effects of cheat grass.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miller	Stephen J.	Miller Land Co., Inc.	AZ	1484	4	General Changes to Regulations	I totally agree the the 5 to 2 years to finalize a grazing decision is a problem that needs to be addressed and solved. One way is to make a 20 year lease the norm and not the exception.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Pearson	Tammy		UT	1065	5	General Changes to Regulations	I think targeted grazing is a very effective tool to use in fire management and invasive species control and the use of rotational grazing should be put into your regulations as another useful tool.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bentz	Erika			1239	1	General Changes to Regulations	I support the following in the review of the grazing regulations: 1. A focus on a process to allow permit holders to initiate rehabilitation activates in allotments. Many times, as the user, we see beginning land health-issues such as invasive annual grass encroachment, conifer encroachment, erosion, etc. A process in which the user could work with the BLM to initiate activities such as chemical treatments, seeding, cutting, etc while having their AUMs protected throughout the process i.e. not put at risk for wanting to engage in conservation activities. 2. Due to these large, challenging land health issues and increased fire frequency, we recommend that free-use grazing permits for fuel reduction be added to the list as a tool to provide a nimble tool to reduce hazardous fuels on public land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hennessy	Eileen		ME	1199	4	General Changes to Regulations	I strongly oppose ANY regulations that would increase livestock grazing in any wild horse/burro Herd Areas. A regulation must be established that brings grazing regulations into conformance with the 1971 Wild Free-Roaming Horses and Burros Act and devote AUMs or forage within Herd Areas PRINCIPALLY, but not necessarily exclusively, to wild horses/burros as the Law specifies. To satisfy this requirement livestock grazing within Herd Areas (including zeroed-out HAs and HMAs) MUST NOT exceed 45% of all forage allocations and WHB should be at least 55% or more of all forage allocations, preferably more since they are a FEDERALLY PROTECTED SPECIES -- invasive commercial livestock is not.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hennessy	Eileen		ME	1199	3	General Changes to Regulations	I oppose the BLM rushing through livestock grazing authorizations under the guise of defining destructive grazing as "a tool to reduce wildfire" or to "improve rangeland conditions" when the science debunks these claims in virtually all cases. I challenge the BLM to truthfully evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and further provide the public with opportunities to evaluate site-specific proposals for fire-related livestock actions and forbid destruction of native vegetation to increase forage for livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Morrison	Colleen		IL	1006	3	General Changes to Regulations	I am against the use of expediting or expanding grazing authorizations in the name of wildfire reduction or improving range land conditions. There is no evidence that grazing is useful in either scenario and in fact there is evidence that grazing leads to increase in invasive grasses and larger and more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carney	Cheryl		TX	179	7	General Changes to Regulations	Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Logan	donna		PA	221	8	General Changes to Regulations	Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950	15	General Changes to Regulations	Holdings Data Base In the event of a findings based on an action by the Lands Claims Board or from a final decision by a court of competent jurisdiction as delineated above, the determination set forth shall be reflected in a holdings data base segregated into parcels and cross referenced as to any discriminating terms including but not limited to parcel number, allotment name, owners or claimants name, metes and bounds and/or recorded plats, etc.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hawkes	Christopher	Pleasantview Grazing Association		1445	1	General Changes to Regulations	Hard in and hard out dates don't work, it needs to be available for forage when the pasture is ready.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cotter	Justina		AZ	437		General Changes to Regulations	Grazing-specific recommendations: 1. Allow for grazing permit retirement and long-term non-use for conservation purposes. 2. Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. 3. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. 4. Ensure grazing management does not impede grazed lands from serving as habitat for native predators. 5. Scientifically evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles. 6. Provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. 7. Forbid destruction of native vegetation to increase forage for livestock. 8. Include an accurate and site-specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. 9. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. 10. Set a fair and equitable grazing fee based on comparable private land prices. 11. Require use of the best available science in livestock grazing decisions. 12. Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	14	General Changes to Regulations	Grazing permit renewals should be included as a Categorical Exclusion under the NEPA process, even when terms and conditions change. Thousands of permits have been analyzed with environmental assessments that resulted in a finding of no significant impact. Permit renewals that are substantially similar to these should be categorically excluded.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mayer	Christopher		NV	823	2	General Changes to Regulations	Grazing management practices requiring flexibility include; season or timing of use; numbers of livestock; distribution of livestock use; duration and/or level of use; kind of livestock. Dietary requirements, forage availability and forage condition also require flexibility
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Graves	Wayne		WY	1383	1	General Changes to Regulations	Grazing allotments can not be reasonably managed from a 9 to 5 job. That management should be in the hands of the lease holder. Example, water suitability and fire can change forage use instantly. Management changes require immediate decisions. Allotment management should be left to grazer and monitored. This would reduce demand on the BLM, ease the Administrative Budget. This particularly important in areas of intermingled private and public lands. OBGA has great potential.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Greta		AZ	972	1	General Changes to Regulations	Frankly, the best improvement for the public lands livestock grazing program would be to find ways to reduce its impacts through grazing permit retirement, extended non-use, and decreased AUM on the West's arid landscapes. Instead, the BLM appears bent on deregulating the permitting system, cutting the public out of many types of permits, and weakening the application of rangeland health standards.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Shephard	Ed	Public Lands Foundation		1128	1	General Changes to Regulations	Flexibility The livestock permittees stress the need for more flexibility. We would like the EIS to cover specifically what it is they want more flexibility in. The development of Allotment Management Plans and paying for grazing at the end of the grazing season based on their actual use reports, for example, provides a good amount of flexibility. Any changes will need to be based on monitoring data.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wines	Gary	Overland Land and Livestock	NV	1389	1	General Changes to Regulations	Flexibility needs to become a part of every permit. A piece of ground cannot be "managed" when everything is written in stone - this day on - this day off - this many AUMs. If an allotment has the forage left over - let them winter graze it. Or it can become fire later on.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mackay Dean	Shelley		MT	1380	5	General Changes to Regulations	Flexibility needs to be created for grazing to control invasive species and for livestock health. Brush and pinion juniper removal as well as seeding [illegible] needs to be [illegible] to improve habitat and forage with growing numbers of wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Mark		NV	1390	4	General Changes to Regulations	Flexibility is the utmost of importance for elements in allotment management plans (AMP), implementation and overall land management. Rangelands are dynamic and continually changing based on such factors as drought, fire, invasive species etc. Flexibility allows for tweaking management as necessary to adjust to these changing conditions. With fixed and mandated permit conditions including AUMs, established on and off dates and other permit conditions, permittees are mostly prevented from adjusting to the conditions that occur over any given year on public lands. Ironically, flexibility is practiced as an ongoing function of private land management and should likewise be embraced by the BLM as a critical tool in land management. It is long overdue that BLM recognize the importance of flexibility and include it in Allotment Management Plans. Effective allotment monitoring provides the basis for changes to occur that require flexibility. Permittees cannot wait for time- consuming EAs to occur before adjusting management to embrace factors that require change.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bottari	Paul		NV	1205	1	General Changes to Regulations	Flexibility in enforcement of grazing regulations is extremely important. Local range con's and advisory committees/boards should be able to make decisions on the local district and area basis. Area's where flexibility is needed include: Season of Use: no season is the same each year. Some years spring comes in March and some years it may be May. Just because the permit may say the early on date is April 15 shouldn't be a firm date if the BLM's range con and the rancher work out a plan that insures the health of the rangelands. If you want to get control of annuals like cheat grass early on while they are green and before seed head maturity is important. Late use on rangelands is usually a plus if there hasn't been much use during the growing season as all the grazing animal will do is help stomp more seed in the ground. Thus, if a livestock operator wants to stay out past a October 15 late date on the permit and there aren't any other factors that would cause damage to the rangeland for the late season use it should be a quick decision to approve by the local district office.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Pete		NV	1446	1	General Changes to Regulations	Flexible grazing 1/1 - 12/31 when forage is available.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gammett	Glenda		OR	1382	5	General Changes to Regulations	Finally, if the authorized officer ultimately reduces active AUMs, those AUMs should be converted to suspended use AUMs. A permanent reduction in Preference AUMs cannot occur unless the Land Use Plan conveys that these AUM's are no longer available for livestock grazing and the authorized officer makes a formal finding on the basis of long-term quantitative monitoring data that there is no "realistic expectation that the AUMs can be returned to active livestock use in the foreseeable future." See 60 Fed. Reg. 9931 (2/22/1995). Any decrease in active use shall be classified as suspended use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gaines Quammen	Betsy			1333	3	General Changes to Regulations	Finally, here are a few things I think BLM needs to implement in managing public lands: only non-lethal predator control; management of livestock that guarantees healthy riparian areas, fewer invasive species, and less erosion; emphasis on retiring allotments and working with conservation groups for permit buy-outs; protecting native species over the interests of individual permittees who plant non-native grasses for livestock; being accountable to the public about the consequences of public land grazing on water, wildlife, climate, and ecosystem health; and insuring the ongoing monitoring of lands so that BLM range cons and the public can recommend management changes when ecological thresholds are crossed by unsustainable stocking, drought, fire hazards, impacts on vulnerable species, and other factors.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	4	General Changes to Regulations	Finally, BLM should consider reviving grazing advisory boards previously authorized by the regulations codified in 1980 and amended in 1986 at 43 C.F.R. § 1784.6-5. For decades, grazing advisory boards provided valuable advice and recommendations related to the development of allotment management plans, utilization of range betterment funds, and other useful information to BLM district offices to whom the boards reported.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Daniels	Shannon		MI	22	4	General Changes to Regulations	Expanding the use of categorical exclusions – i.e. completing fewer full and fair environmental analyses – and undermining public participation opportunities in the process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Magagna	Jim	Wyoming Stock Growers Association	WY	1028	4	General Changes to Regulations	Evolving resource conditions as well as the complexities of modern livestock operations demand maximum flexibility in the terms & conditions of permits. Given the need to meet the requirements of the National Environmental Policy Act (NEPA) and frequent litigation based on that act, BLM personnel and grazing permittees have been denied the flexibility to make timely decisions regarding grazing that may lie outside of the strict terms and conditions of a permit. For these reasons, WSGA urges that the regulations allow for maximum flexibility to be built into renewed permits. These changes should include up to 15 days variation in on and off dates, up to ten percent exceedance of permitted numbers and changes in class of livestock so long as allotment objectives are being met.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	17	General Changes to Regulations	Emergency Grazing Permits This is uncommon, but when the situation occurs it can be a challenge to handle. If livestock are out in a remote area when an early snow storm ends up trapping them out there for part (or all) of the winter, should there be a method for BLM to permit such activities? I am aware that this has happened a few times in the recent past. If BLM can verify that the livestock operator has made a good faith effort to remove their stock from the range, and there is no feasible way to do this, the BLM should be able to issue a special type of Temporary Non-Renewable permit to allow the livestock to be permitted in the area, without having to go through the whole NEPA and Permit Issuance process. Right now there is no good way to approach this. You can remove livestock from the range due to emergency, but there is no way to authorize use in the case of an emergency. You could also consider how to handle livestock displaced by wildfires under this same category.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	16	General Changes to Regulations	Emergency Grazing Permits This is uncommon, but when the situation occurs it can be a challenge to handle. If livestock are out in a remote area when an early snow storm ends up trapping them out there for part (or all) of the winter, should there be a method for BLM to permit such activities? I am aware that this has happened a few times in the recent past. If BLM can verify that the livestock operator has made a good faith effort to remove their stock from the range, and there is no feasible way to do this, the BLM should be able to issue a special type of Temporary Non-Renewable permit to allow the livestock to be permitted in the area, without having to go through the whole NEPA and Permit Issuance process. Right now there is no good way to approach this. You can remove livestock from the range due to emergency, but there is no way to authorize use in the case of an emergency. You could also consider how to handle livestock displaced by wildfires under this same category.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	2	General Changes to Regulations	Eliminating the Protest Period for a Grazing Decision While in some ways I like the idea of reducing this level of bureaucracy in issuing grazing decisions, I think there could be some concerns that this action might increase litigation, since individuals who would normally have just protested a decision, will now have to appeal it. A protest can be done by anyone who is willing to write a letter stating their concerns. Appealing a decision in today's world requires involving a lawyer, which involves considerable expense. This will likely not dissuade some of the NGOs that typically appeal the BLM, but it could affect livestock operators, who lack adequate funds to hire legal council every time they disagree with a decision that the BLM makes. In this way, I'm concerned this change in the grazing regulations could have some unintended side effects. In addition to this, I see it likely that after there is an increase in litigation, the BLM will simply require that a Draft EA be released for a 30 day public review period (similar to how the wild horse program does it), which will be similar (except less efficient) than issuing a Proposed Decision, which automatically becomes final in the absence of a protest.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	9	General Changes to Regulations	Current regulations have eliminated the requirement that the BLM must conduct meaningful consultation, cooperation and coordination with grazing permittees and lessees. See Public Rangeland Improvement Act (PRIA), Section 8.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	16	General Changes to Regulations	Current regulations eliminated the requirement that applicants be in the livestock business, this has been a criterion since the enactment of the Taylor Grazing Act in 1934. We are not aware of ANY language from Congress that has conveyed an opinion that BLM permittees or lessees should not be required to be in the livestock business. Applicants who are not in the livestock business do not intend to stock a BLM permit or lease with livestock. Proper livestock grazing is supported by peer-reviewed science-based research and literature to be one of the only ways to maintain the health of Western rangelands and is a contributor to productive grouse and other wildlife habitats. No grazing reduces the amount of money paid to the state and federal governments for the authorized use of BLM allotments. The federal courts have ruled that it is illegal for the BLM to issue a grazing permit to NOT graze livestock which was Babbitt's conservation use idea. Since that ruling by the federal court, there is no logic or legal basis for those who are not in the livestock business to qualify for a grazing permit or lease.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miltenberger	Sheena			1185	1	General Changes to Regulations	Current grazing rules do not allow management flexibility in season of use and as response to annual climatic variations. As it stands, it takes a multi-year NEPA/EIS process in order to change season of use on an allotment. With an end result of an allotment remaining mired in an inflexible management program. All current rangeland science and research supports deferred rest and rotation of grazing schedules so that grazing does not repeatedly occur in the same season year after year. This is not "new" science; a deferred rest and rotation system has been proven through research and practical use across a multitude of ecological sites and grazing operations. The grazing rule revision absolutely needs to incorporate a process in which season of use can be flexible on an annual basis and therefore be more responsive to annual climatic variations. It is well known that repeated grazing use in the same season year after year is detrimental to vegetative health and, over the long term, negatively impacts all aspects of ecological functions. It is imperative the BLM creates and implements a process under this rule revision in which season of use can be adjusted annually to improve vegetative and ecosystem health. The available science clearly supports management flexibility and long term grazing rotation planning. Dooming allotments to repeated same-season grazing is simply poor management and is not in the best interest of the land or the permittees.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Donofrio	Mac		MT	10	1	General Changes to Regulations	Create no new categorical exclusions and expand use of EAs and EISs. Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat for native predators. Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. Forbid destruction of native vegetation to increase forage for livestock. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations. Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. Disclose underlying Indigenous land claims and address environmental justice issues. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	poland	barbara		CA	17	1	General Changes to Regulations	Create no new categorical exclusions and expand use of EAs and EISs. Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. Ensure grazing management does not impede grazed lands from serving as habitat for native predators. Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. Forbid destruction of native vegetation to increase forage for livestock. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. Include water quality monitoring as part of the land health evaluations. Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. Disclose underlying Indigenous land claims and address environmental justice issues. Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. Require use of the best available science in livestock grazing decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Warren	Greg			1180	3	General Changes to Regulations	Could the BLM use existing permits to address areas not achieving land health in grazing allotments? Commercial grazing is not normally a tool to be used to enhance rangelands. Instead, any commercial grazing must provide for in part achieving and maintaining proper functioning conditions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Patterson	Cynthia		GA	1098	1	General Changes to Regulations	Conservation organizations and individuals wrote counter proposals to the BLM changes. Those revisions would protect our public lands and increase natural forage. I support publishing these counter proposals in the BLM’s EA or EIS, with current grazing regulations, and the proposed BLM revisions. • Only 30% of the vegetation would be grazed. Native plants could reproduce, survive drought, provide more livestock forage and increase food and habitat for native animals. • Limit vegetation “treatments” to those promoting native vegetation, not European grasses. • Require the BLM to respond to reports from the public regarding grazing permit violations and/or significant damage to natural or cultural resources.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riley	Zach	Colorado Farm Bureau	CO	1029	3	General Changes to Regulations	CFB believes that BLM should not be obligated to impose an automatic decrease in AUMs. Instead, before the authorized officer decreases active use because of an unacceptable level of use or exceeding carrying capacity, BLM should first be required to consider modifying management practices (e.g., rotation, duration, etc.) and not automatically reduce active AUMs. Reduction of active use AUMs should only occur: (1) after modification of management practices is first attempted as a solution; and (2) then if unsuccessful, active use AUMs will be reduced only in direct proportion to the quantity of inconsistent use. If the authorized officer ultimately reduces active AUMs, those AUMs should be converted to suspended use AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bushman	Darin	Piute County	UT	1263	4	General Changes to Regulations	Catastrophic wildfires are causing every greater damage on landscapes across the western United States. Overgrown vegetation leads to a dangerous buildup of combustible fuels. Livestock can play an important role in reducing dangerous fuel loads and therefore reducing the risk of catastrophic wildfires. Livestock producers, governmental agencies, the U.S. military, and other groups have successfully used livestock to create fuel breaks and reduce hazardous fuels in projects across the western United States. The BLM's grazing regulations should be updated to enhance the ability of BLM field offices to use livestock to create fuel breaks and reduce fuel loads. Such use of livestock should happen cooperatively with local governments, States, private landowners, fire departments, livestock producers, and other federal agencies.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Petersen	Ray	Emery County, UT	UT	1313	5	General Changes to Regulations	Catastrophic wildfires are causing every greater damage on landscapes across the western United States. Overgrown vegetation leads to a dangerous buildup of combustible fuels. Livestock can play an important role in reducing dangerous fuel loads and therefore reducing the risk of catastrophic wildfires. Livestock producers, governmental agencies, the U.S. military, and other groups have successfully used livestock to create fuel breaks and reduce hazardous fuels in projects across the western United States. The BLM's grazing regulations should be updated to enhance the ability of BLM field offices to use livestock to create fuel breaks and reduce fuel loads. Such use of livestock should happen cooperatively with local governments, States, private landowners, fire departments, livestock producers, and other federal agencies.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Singleton	Annette	Summit		1305		General Changes to Regulations 4	Catastrophic wildfires are causing every greater damage on landscapes across the western United States. Overgrown vegetation leads to a dangerous buildup of combustible fuels. Livestock can play an important role in reducing dangerous fuel loads and therefore reducing the 'risk of catastrophic wildfires. Livestock producers, governmental agencies, the U.S. military, and other groups have successfully used livestock to create fuel breaks and reduce hazardous fuels in projects across the western United States. The BLM's grazing regulations should be updated to enhance the ability of BLM field offices to use livestock to create fuel breaks and reduce fuel loads. Such use of livestock should happen cooperatively with local governments, States, private landowners, fire departments, livestock producers, and other federal agencies.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dietz	Victoria	Washakie County Conservation District	WY	1000		General Changes to Regulations 6	By effectively managing fuel and forage loads, the habitat structure and beneficial vegetation increases, which will improve overall habitat health. Species such as, sage-grouse, antelope, and deer can increase utilization of this beneficial vegetation and habitat.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152		General Changes to Regulations 5	BLM's plan to improve "flexibility" in areas of land and resource management is to issue authorizations without additional analysis and decision time to address permittee needs for livestock movement, or in concert with changing environmental conditions when it comes to issuing crossing authorizations or non-renewable permits. The BLM has also proposed providing limited flexibility in season of use for permittees to manage livestock in concert with management needs and creating a consistent approach to documentation, billing and settlement, especially of incidental, and non-willful occurrences. This could be a useful approach to manage livestock by different types of water years and drought conditions and in the fact of climate change. However, our experience of BLM-managed public lands are that livestock permittees have put their cows on their allotments regardless how much or how little forage is present and the rangeland conditions have continued to deteriorate. While these changes in flexibility for allotments such as turn on or removal dates or stocking rates sound good on the surface, our experience is that livestock permittees have generally failed to account for changing vegetation conditions or to reduce stocking when needed to restore ecological damage. Ranchers have been more than willing to increase AUMs but never decrease AUMs
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Jon	Sagebrush Habitat Conservation Fund	ID	891		General Changes to Regulations 3	BLM should use this process to update its grazing fee policy, and set mandatory annual fee increases to the maximum extent allowed by law until fees for grazing on public land reflect the value of grazing use of comparable private lands, and take into account the full costs of administration.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	Peter	Riddle Ranches, Inc.		1211		General Changes to Regulations 4	BLM should use targeting grazing more to reduce unwanted forage species and wildfires.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallwood	Lori	Big Horn County Commissioners	WY	1223	8	General Changes to Regulations	BLM should consider revising the grazing regulations to permit the use of grazing to address invasive plants. Livestock grazing on public lands can be utilized to reduce invasive and noxious plants, such as cheatgrass.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frandsen	Fred	Washakie County Commissioners	WY	1246	6	General Changes to Regulations	BLM should consider revising the grazing regulations to permit the use of grazing to address invasive plants. Cheatgrass is a growing problem throughout Washakie County, outcompeting important forage for livestock and wildfire and increasing the risk of fire by adding fuel loads. Under the right circumstances, livestock will graze cheatgrass and other noxious plants to reduce the chances of them proliferating and spreading. BLM grazing regulations should allow flexibility to use grazing as a tool to reduce noxious and invasive plants on public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Thompson	Troy	Wyoming County Commissioners Association	WY	881	4	General Changes to Regulations	BLM should consider providing greater flexibility regarding how it decreases permitted use. Rather than automatically decreasing animal unit months (AUMs) when range conditions do not allow for grazing, BLM should be given the flexibility to modify management practices, such as rotation, timing and duration. Additionally, when BLM determines that a reduction in AUMs is necessary, the AUMs should be suspended, not permanently reduced.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallwood	Lori	Big Horn County Commissioners	WY	1223	2	General Changes to Regulations	BLM should also consider incorporating outcome-based grazing into its grazing regulations consistent with the BLM's efforts to adopt this practice via policy. Outcome-based grazing provides permittees the opportunity to work with the agency to respond quickly to changing conditions on the landscape, such as drought and wildfire. WCCA appreciates BLM's efforts to implement outcome-based grazing to date.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Thompson	Troy	Wyoming County Commissioners Association	WY	881	3	General Changes to Regulations	BLM should also consider incorporating outcome-based grazing into its grazing regulations consistent with the BLM's efforts to adopt this practice via policy. Outcome-based grazing provides permittees the opportunity to work with the agency to respond quickly to changing conditions on the landscape, such as drought and wildfire. WCCA appreciates BLM's efforts to implement outcome-based grazing to date.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Florence	Lenn	Florence Family Farm		1278	4	General Changes to Regulations	BLM regulations should be updated to require range personnel to investigate when dozens of dead cattle are found on BLM land in riparian areas. One of our hands reported dozens of dead cattle to the local BLM office, and they acted surprised that we thought they should be involved.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gammett	Glenda		OR	1382		4 General Changes to Regulations	BLM has a track record of making adverse rangeland health determinations under Section 4180.2(c) and/or making adverse land use plan objective determinations under Section 4100.0-8 or Section 4130.3-3. Based upon these determinations, BLM then decreases permitted AUMs under Section 41103-2(b) without quantifying the decrease. This is particularly occurring when BLM is attempting to rationalize any decrease in Permitted Use based upon two of the three conditions, i.e. Subpart 4180 and Utilization Patterns, in section 4110.3-2(b) which do not, in-and-of-themselves, quantify grazing capacity and the associated decrease in Permitted Use AUMs. BLM should not be obligated to impose an automatic decrease in AUMs. Instead, before the authorized officer decreases active use because of an unacceptable level of use or exceeding carrying capacity, BLM should first be required to consider modifying management practices (e.g., rotation, duration, etc.) and not automatically reduce active AUMs. Reduction of active use AUMs should only occur: (1) after modification of management practices is first attempted as a solution; and (2) then if unsuccessful, active use AUMs will be reduced only in direct proportion to the quantity of inconsistent use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schultz	Brad		NV	1327		2 General Changes to Regulations	Bills: Provide the opportunity for permit holders to pay their grazing bills in advance for periods of 2 or more years. Perhaps at a small discount for years 2 or further out as an incentive to use such a procedure. It's not much different than a long-term periodical subscription or organizational memberships, and would provide some benefit to both the producer and the BLM.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721		6 General Changes to Regulations	Billing for pennittees with less than 100 AUM's could be changed to every 5 or 10 years. This would decrease the BLM's administrative workload each year. Multiple year billing should also be made available for permittees with more AUM's billed, if they request it
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lanham	Miteshell	Lander County, NV	NV	1219		2 General Changes to Regulations	Before imposing grazing restrictions or seeking changes in livestock rates or seasoned of permitted use, Lander County believes that the following measures should first be considered: * Identify and implement all economically and technically feasible livestock distribution * Forage production enhancement * Weed Control programs * Prescribed grazing systems * Off -site water development by the water rights holder with the rights being retained by the water rights holder. * Shrub and pinyon/juniper control * Livestock salting/supplementing plans * Establishment of riparian pastures and herding
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lanham	Miteshell	Lander County, NV	NV	1219		1 General Changes to Regulations	Before imposing grazing restrictions or seeking changes in livestock rates or seasoned of permitted use, Lander County believes that the following measures should first be considered: * Identify and implement all economically and technically feasible livestock distribution * Forage production enhancement * Weed Control programs * Prescribed grazing systems * Off -site water development by the water rights holder with the rights being retained by the water rights holder. * Shrub and pinyon/juniper control * Livestock salting/supplementing plans * Establishment of riparian pastures and herding

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	29	General Changes to Regulations	Beaver restoration. Beavers continue to be misunderstood and removed from streams. However, experts consider beavers keystone species and ecosystem engineers, recognizing the enormous value of beaver to maintaining and restoring ecosystems and water tables (Naiman et al. 1994; Gurnell 1998; Wright et al. 2002; Butler and Malanson 2005; Westbrook et al. 2006; Stevens et al. 2007; Bartel et al. 2010; Westbrook et al. 2011; Fesenmyer et al. 2018). Conserving beavers and restoring them to our range lands may be crucial to mitigating the effect of climate change and sustaining productivity and ecosystem health (Hood and Bayley 2008; Bird et al. 2011; Dittbrenner et al. 2018). In the regulations, the BLM should disallow lethal removal of beaver as a mechanism to modify rangeland health or condition
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	15	General Changes to Regulations	Base property requirements need to be simplified. The permittee has to be able to put their cows somewhere when not on federal land. Perhaps a self-certification by the permittee would simplify the process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Southwick	Jess	Prescott Land and Livestock	ID	1392	1	General Changes to Regulations	B) Allow adjustable dates depending on fuels and/or available forage.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	21	General Changes to Regulations	AWHC suggests that the BLM seek to reduce permitted livestock grazing in federally designated wild horse and burro habitat. By reducing permitted livestock grazing in allotments which overlap with HMAs or HAs, the BLM then must equitably allocate AUMs to wild horses and/or burros in these areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	1	General Changes to Regulations	As stated in the NOi, since the 1995 and 2006 regulatory revisions, additional legislation has been enacted governing the grazing of livestock on BLM-administered lands. By way of example, the fiscal year 2015 National Defense Authorization Act [P.L. 113-291] contained a number of provisions from the Grazing Improvement Act [S. 258, 113th Cong. (2014)], including the categorical exclusion of trailing and crossing permits under the National Environmental Policy Act (NEPA), direction regarding the prioritization and timing for the completion of NEPA analyses, and the continuation of grazing permit terms and conditions in instances where the NEPA cannot be completed before the expiration of a term grazing permit. Despite this statutory direction, the BLM has not adequately provided a regulatory framework in which to implement these tools. Therefore, the OCA suggests that processes and procedures be developed by the BLM to implement these statutes, and that they be codified in regulation.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Depoali	Ed			1420	7	General Changes to Regulations	Any revision to the regulations must emphasize maximum flexibility for managers and scientists to deal with the changes that have emerged. One being the fire-invasive species cycle. I was fortunate to serve as area manager during the good times, the early 1960's to 1983. In 1962 the Nevada State Director gave the first crop of area managers their marching orders, they were simple: 1. You are responsible for an area of public land. 2. You will do your best to make it better than it is now. 3. You will not let problems get to me that you can handle. We were turned loose. Regulations were respected and followed. The area manager concept resulted in some unforeseen benefits: stiff competition between area managers for funding improvement projects as well as shared knowledge between us regarding what works and what does not. To try to correct or salvage the existing regulations is similar to trying to save a terminally ill patient. It may be better to start over. Despite the anti-grazing, anti-everything rhetoric, there are many verified examples where grazing has improved rangeland. The opponents of grazing see a cow-pie and are alarmed. The range scientist sees a return of organic matter and litter to the soil and smiles. The opponents of grazing see a cow track and worry. The range scientist sees a perfect place for a new plant next spring and smiles. This is where we are in 2020.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ocean	David		CA	973	1	General Changes to Regulations	Any new regulations should: • Allow for grazing permit retirement and long-term non-use for conservation purposes. This is especially important in the nearly 5 million acres of designated Wilderness on BLM administered lands that are currently open to livestock grazing. • Create no new categorical exclusions and expand use of EAs and EISs to facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. • Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis, while ensuring grazing management preserves the habitat value of grazed lands for native plant and wildlife species and does not impede grazed lands from serving as habitat for native predators. • Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions and forbid destruction of native vegetation to increase forage for livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Morrison	Colleen		IL	1006	1	General Changes to Regulations	Any new regulations should: Expand use of EAs and EISs. Facilitate greater levels of public engagement by posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species including native predators. Ensure NEPA analysis considers the habitat of species in crisis and the broader extinction crisis underway. Scientifically and impartially evaluate the contribution of livestock grazing to cheatgrass and accelerated wildfires. Forbid destruction of native vegetation to increase forage for livestock. Include water quality monitoring as part of the land health evaluations. Include an accurate and site specific economic analysis of grazing with every permit renewal weighing the money obtained from grazing fees against the cost of administering the permit. Require use of the best available science in all livestock grazing decisions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasano	Timothy	Pro Se Research, LLC.	NV	950	17	General Changes to Regulations	Any final decision on a claim left unsigned beyond 90 days maturity after the issue has been entered upon the record of the Land Claims Board, shall be deemed signed and enforceable. The Claimant may elect to record the said document with the County Recorder in the county in which the claim is located. The final decision document will hold the full force and effect of law in reflecting his/her rights to ownership or adherence to any issue decided by the aforementioned Land Claims Board.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doverspike	Mark		OR	994	8	General Changes to Regulations	Any change in MONITORING requirements should be simple and easy to comply with. The usage should be something that isn't so arduous to comply with that it renders the permit unusable. Those considerations need to include socio economic and not just environmental. These permits impact whole communities and the community economic and cultural values.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	9	General Changes to Regulations	Another opportunity for the agency to maximize efficiency is to utilize partner agencies to assist with grazing permit renewals. There are many partners, especially in the State of Idaho that could be of great assistance in the grazing permit renewal process. Allowing partners such as the Idaho State Department of Agriculture, Idaho Department of Fish and Game, Idaho Department of Lands, the Governor's Office, and others to be part of ID teams and to assist with the writing of NEPA documents would maximize efficiency and aid with proper coordination between the State and the BLM. This would streamline the NEPA process and free up BLM staff to collect monitoring data and properly manage rangelands. The State of Idaho has recently initiated a program called the Good Neighbor Authority (GNA) with the United States Forest Service. It is used to maximize efficiency and properly manage Idaho's forests. A similar program would be beneficial to the BLM in order to properly manage rangelands across the West.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mayer	Christopher		NV	823	3	General Changes to Regulations	Annual Grazing Plan Coordination with the permittee and the BLM will occur each year. Coordination will include grazing plans, rangeland objectives, animal health objectives in addition to rangeland monitoring to include measuring grazing utilization. An annual grazing plan will be based on or anticipate forage condition and production and rangeland health conditions. Grazing strategies would consider and review previous years monitoring information and grazing records. It is expected that carrying capacity and management strategies recognize variability in forage conditions affecting livestock management, movement, distribution etc. all of which require flexibility. Under the best grazing practices it is recognized that grazing use and distribution will be variable across a use area. Grazing records will be maintained Records will include stocking levels by allotment, periods of use by allotment, areas of use within each allotment, cattle movement beginning and ending dates between allotment.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sewell	James	TA Ranch	WY	1178	2	General Changes to Regulations	Also, having unchangeable fixed allotments dates for one allotment affects the use of other private land, private leases, Forest Service leases, and other BLM permits. It seems more natural to me to vary the grazing plan from year to year, to allow different plant species to recover.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frandsen	Fred	Washakie County Commissioners	WY	1246	5	General Changes to Regulations	Allowing free-use grazing permits to be issued for wildfire fuel reduction purposes and allowing permittees to access rangelands at the appropriate times in the season when invasive species such as cheat grass can be combatted are both tools for addressing fuel loads.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	10	General Changes to Regulations	Allotments should be managed based on the condition that they are in rather than on their condition when the last allotment management plan was updated. For example, if an allotment has been burned multiple times and is now annual grassland, grazing management should reflect that status rather than continuing to manage the range as a native grassland or shrubland system.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	17	General Changes to Regulations	Administrative efficiency could be greatly enhanced by creating a straight-forward, systematic, and comprehensive online repository for the primary grazing permit/allotment documents that are the subject of almost every grazing related FOIA request, such as: term grazing permits, grazing decisions and/or agreements, Resource Management Plans, Allotment Management Plans, habitat management plans, wild horse/burro herd management plans, monitoring site location documentation forms, monitoring data summaries/reports, Soil Map Unit and Ecological Site maps, allotment/pasture boundary maps, allotment evaluations, Rangeland Health Assessment and Evaluation reports, grazing EAs/EISs, public correspondence records, and the like. Affected Interests could then access all these documents online through a self-help process rather than require BLM staff to provide the same materials over and over in response to various FOIA requests. Administrative efficiency could further be enhanced by revising the regulations at 43 CFR Part 4 to streamline the protest and appeal process and assure that only entities that have a genuine interest that is shown to be adversely affected by grazing management have standing to protest or appeal grazing decisions, and requiring that the burden of proof lies squarely with the party alleging a cognizable harm. Currently, environmental protests/appeals only require a mere allegation of a potential environmental harm, and the burden of proof is then flipped on its head and the agency and/or permitted user is required to prove that the alleged harm has not occurred and/or will not occur. This is a near impossible burden because whenever careful evaluation of all the factors for which information is available discredits the allegation, it is easy to dream up some new factor that has not yet been considered that "may" trigger the potential harm that is alleged.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	18	General Changes to Regulations	Administrative efficiency could be greatly enhanced by creating a straight-forward, systematic, and comprehensive online repository for the primary grazing permit/allotment documents that are the subject of almost every grazing related FOIA request, such as: term grazing permits, grazing decisions and/or agreements, Resource Management Plans, Allotment Management Plans, habitat management plans, wild horse/burro herd management plans, monitoring site location documentation forms, monitoring data summaries/reports, Soil Map Unit and Ecological Site maps, allotment/pasture boundary maps, allotment evaluations, Rangeland Health Assessment and Evaluation reports, grazing EAs/EISs, public correspondence records, and the like. Affected Interests could then access all these documents online through a self-help process rather than require BLM staff to provide the same materials over and over in response to various FOIA requests. Administrative efficiency could further be enhanced by revising the regulations at 43 CFR Part 4 to streamline the protest and appeal process and assure that only entities that have a genuine interest that is shown to be adversely affected by grazing management have standing to protest or appeal grazing decisions, and requiring that the burden of proof lies squarely with the party alleging a cognizable harm. Currently, environmental protests/appeals only require a mere allegation of a potential environmental harm, and the burden of proof is then flipped on its head and the agency and/or permitted user is required to prove that the alleged harm has not occurred and/or will not occur. This is a near impossible burden because whenever careful evaluation of all the factors for which information is available discredits the allegation, it is easy to dream up some new factor that has not yet been considered that "may" trigger the potential harm that is alleged.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	2	General Changes to Regulations	Additionally, in those cases where the statute stipulates "the Secretary may," the BLM should provide for those instances where it is appropriate not to take the proposed action. For example, as the categorical exclusion for trailing and crossing permit issuance is provided for by statute, the implementing regulations should identify a particular set of circumstances under which it is appropriate to require further NEPA review before the issuance of such permit. In cases where a determination that further NEPA is required, the Authorized Officer (AO) charged with NEPA determinations should be no less senior than the district manager.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Short	Robert	Converse County, WY	WY	1396	2	General Changes to Regulations	Additionally, BLM should consider providing greater flexibility regarding the process for decreasing permitted use. Should changing conditions warrant a review of the grazing permit, BLM must not automatically decrease AUMs but should first require modifications of management practices. If and when BLM ultimately determines active AUMs should be reduced, those AUMs should be converted to suspended use and not permanently reduced.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Allred	Spencer		WY	897	11	General Changes to Regulations	Actual Use Billing If we are looking to make things more streamlined and flexible for livestock operators, we should consider making Actual Use billing more available to permittees. Right now it requires an Allotment Management Plan that specifically provides for it. Removing this requirement would be a good start. Perhaps, after the fact billing should become the standard method of billing for the BLM. This would have a couple of benefits, with some definite challenges. The livestock operator would benefit from only paying for exactly what they used on a given billing cycle. Also, the BLM would benefit by getting more accurate Actual Use Statements (many right now just say "Same as Billed", making the Actual Use Statement almost worthless).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Denice	Lincoln County, NV		1177	4	General Changes to Regulations	A system of targeted grazing designed to reduce fire fuel loads. Most of this can be done during the fall and winter- outside of the normal growing season. This type of grazing may require the permittee to use areas outside of a normal 'rotation' but these 'contracts' would not count against permitted use (no AUMs required). This might be similar to the old Temporary Non-Renewable (TNR) grazing permits, but in a framework that is manageable and readily available.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bentz	Linda			1238	1	General Changes to Regulations	A process for the permittee to identify problem areas within their permits that are small and manageable before they become large and unmanageable. This process would allow early feedback from the permittee to the agency in identifying developing problem i.e. the introduction and beginning spread of an invasive species. Ranchers have a unique ability to provide on-the-ground feedback quickly to the Agency about developing problems, allowing for a closer and more beneficial relationship.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Whicker	Keven	Beaver County	UT	754	5	General Changes to Regulations	A failure to meet Rangeland Health Standards has nearly always resulted in livestock grazing reductions. The true culprit for the degradation of the range conditions not meeting the standards should be conclusively identified. In our area of western Utah, an overpopulation of wild horses have over-grazed many allotments leaving almost nothing for the permitted livestock to graze. In some instances, the devastation to the range will take many years to recover. In other instances, wildlife, mining or recreational activities may be the contributing factors in degraded rangeland health. These identified sources need to be held duly responsible for the failure to meet rangeland health standards and adjustments made accordingly. Removing permitted livestock should not be the default mitigation whenever rangeland health evaluations decline.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	19	General Changes to Regulations	7) BLM should use the most current and honest evaluation of livestock grazing scientific studies to guide grazing regulations. For example, many recent scientific studies have demonstrated that grazing practices have contributed to the expansions and acceleration of non-native grasses such as ventenata, medusahead and cheatgrass, as well as accelerated wildfire cycles. The BLM must provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. BLM must also require use of the best available science in livestock grazing analyses and management decisions. Further, BLM must limit vegetation "treatments" to only those practices that promote native vegetation, rather than non-native species such as crested wheatgrass
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	18	General Changes to Regulations	6) Grazing regulations should discourage management practices that impede grazed lands from supporting habitat for native wildlife including birds, small mammals, big game and predators.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	17	General Changes to Regulations	5) The grazing regulations must require livestock grazing management to improve carbon sequestration in soils, and analyze grazing in the full context of climate change, both in terms of the contribution of livestock grazing and management to climate change as well as the consequences to other natural resources including but not limited to impacts to riparian areas, springs, seeps and other aquatic habitats.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Pearce	Benjamin	Pearce Trust	NM	937	4	General Changes to Regulations	4) Pearce Trust approves of the proposed selective grazing and stocking to reduce fire hazards and improve rangeland health. This will benefit our operation by introducing this sustainable act to allow us to operate the land for the foreseeable future.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vincent	Tamara		UT	920	5	General Changes to Regulations	4 Policies should not be used for Regulations. BLM personal should follow regulations and not blame policies for not being able to work with permittees. All regulations should be the same for all BLM offices and personal granting flexibility in rare circumstances.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Duncan	Dan		NV	919	3	General Changes to Regulations	3.Regarding the cooperative agreements with the water sources. The BLM should be held accountable like the permittee is. The permittee has to do all the labor and maintenance on the water sources. We have been over 5 years trying to get the BLM to redrill our well at the Packard Flat windmill. It is a hardship and time-consuming driving over 20 miles one way with the water truck we had to purchase to haul water to our cattle because the windmill is dry. There is too much red tape and hoops to jump thru to get things done.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miller	Stephen J.	Miller Land Co., Inc.	AZ	1484	6	General Changes to Regulations	3. Regarding watershed evlauations and land health, there should be treated as one additional source factor. Each watershed may have its unique characteristics that may impact a decision. Permittees should be a partern with BLM in this area.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cooper	Mary Anne	Oregon Farm Bureau	OR	893	2	General Changes to Regulations	3. Improving permitting efficiency. BLM also indicated a need to change how the BLM issues decisions for crossing permits, temporary nonrenewable permits, and authorizing grazing to reduce wildfire risk, expanded or clarified use of NEPA categorical exclusion authorities, and streamlining protest and appeal processes. We fully support improved permitting efficiency in these areas and reiterate our concern above about ensuring that there is adequate direction supporting flexibility in the administration of these new efficiencies to ensure that they cannot be subject to abuse at the district level upon implementation. We also strongly encourage BLM to ensure that its revisions adequately protect grazing preference, and utilize all the tools in the toolbox when addressing administrative issues with the permit instead of automatically moving to AUM reductions. AUM reductions should be a last resort, and only utilized after all other options to correct issues - including investing in range improvements or altering management - have failed to address the issue.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vincent	Tamara		UT	920	4	General Changes to Regulations	3 Permittees should not have to give BLM a share of their water rights when crossing BLM land or piping water to distribute herd (cattle and wildlife) concentration. Distribution of water is best for land health in all allotments.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Duncan	Dan		NV	919	2	General Changes to Regulations	2.Better relationships between the BLM Range Cons and the Permittee. We should work together and not against each other. The rancher has a lot of wisdom and personal knowledge as to what will work best on his allotment, as opposed to a Range Con fresh out of college and not from the west. The Range Con is a great asset to the ranchers, there just needs to be more give and take and cooperation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Pearce	Benjamin	Pearce Trust	NM	937	2	General Changes to Regulations	2) Pearce Trust supports the term extension from three to ten years for transferred permits. This will allow local field offices to shorten application returns and make the office more efficient.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vincent	Tamara		UT	920	2	General Changes to Regulations	2 More Flexibility for management. The permittees and BLM personal need to have the ability to look at existing conditions and work together for the best of land health. Example: On our allotment we may need to go on earlier or later depending on the conditions of the year. Same thing with coming off allotments. On our allotment we are to maintain fences and ponds but are not to cross land with ATV's or other motor vehicles that would carry supplies. But sportsmen have rerouted roads across BLM Lands and BLM will do nothing to stop these new roads.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nagel	Clinton	Gallatin Wildlife Association	MT	949	15	General Changes to Regulations	15. setting a commensurate pricing program based upon comparable private land prices for grazing fees. Far too long, BLM and other federal agencies have set the grazing fees based AUMs far too low. This has most likely robbed the federal treasury of millions of dollars over these many, many years. This is unforgivable. Think of the money that could have been derived from grazing fees which could have been plowed back into the agency to implement policies and practices that could have improved rangeland conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	26	General Changes to Regulations	14) The Broads recommend that grazing standards allow for only 30% utilization of the native vegetation. This will improve plant reproduction, survival during drought conditions, and forage for livestock and wildlife, as well as provide better reproductive and rearing cover for native birds, small mammals and pollinators. Current grazing practices allow up to 90% utilization by livestock, leaving almost nothing for plant reproduction or native wildlife species. Studies of reduced grazing utilization have demonstrated that benefits accrue to both the ecological condition of rangelands and wildlife habitats, as well as for the economic well-being of ranchers. A person on our leadership team is a retired veterinarian who has worked tirelessly with livestock operators for decades, from northern Nevada to SE Washington, to convince cattlemen that their livestock would have improved performance via weight gains and reproductive capability if ranges were grazed less hard and ecological conditions were improved by reducing utilization on native plants
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nagel	Clinton	Gallatin Wildlife Association	MT	949	11	General Changes to Regulations	11. the possibility retiring grazing allotments.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Duncan	Dan		NV	919	1	General Changes to Regulations	1.More flexibility with the grazing permits when it comes to turning out and bringing the cattle in off the range. For example, the condition of the range should be taken into consideration when turning out and removing the cattle. If we have a good wet year, we should be allowed to stay out on our range thus allowing the rancher to be more efficient in grazing the range, reducing the fuels that contribute to the wildfire and managing the invasive plant species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ure	Amy			1352	1	General Changes to Regulations	1), Grazing regulations should provide enough flexibility in the short term as well as the long term to provide adequate protections from wildfire. Grazing should be incorporated into grazing regulations as a tool to combat fuel loads and prevent wildfire. Permitting grazing outside of the ordinary grazing practices and standards should be a listed categorical exclusion available to range conservationists to utilize on demand and with short notices as well as parts of long-term objectives. This is justified with the acknowledgement that catastrophic wildfires have far more negative impacts to all resources than alterations to grazing practices in any given time period. 2), Climax communities are not usually included in monitoring of grazing. This has been a mistake and allowed for the expansion of climax communities that are more fire prone. To alleviate this, climax community areas within an allotment should be monitored along -side monitoring of grazing and be a component of overall rangeland health evaluations. This should aid range managers in managing the landscape for sustained yields and multiple use which naturally limits and retards extreme wildfire.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	13	General Changes to Regulations	1) Any changes in grazing regulations should require that the lands be managed for the benefit of all native plants and animals that depend on these public lands and for non-extractive users. The BLM must promote grazing practices that restores and preserves the habitat value of grazed lands for native plant and wildlife species. These especially include ESA-listed species, federal and state sensitive species, and species such as the sage grouse that have experienced significant declines due to loss of habitat and have been impacted by livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Roberts	Brad		NV	1426	1	General Changes to Regulations	(1) Managers should be payed on the productivity of the district.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Frank		ID	1281	7	General Changes to Regulations	- The grazing regulations should address the needed coordination with permittees and accommodations to be implemented in any cases where the federal government intends to apply prescribed fire on a grazing allotment
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Frank		ID	1281	2	General Changes to Regulations	- Please use grazing as one of the tools to implement the intent of the December 2018 Executive Order related to federal land management and the reduction of fire risk and to the long-term fire suppression and management costs. Managed grazing is an effective fuel load reduction tool, will improve the health of our federal lands if properly and broadly used, and is critical to sustaining wildlife populations as well as to local, state and national economies. Additionally, grazing is sustainable and generates revenue, unlike almost all other tools currently being employed by our federal government to address fire risk and improve the health of our federal lands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Frank		ID	1281	3	General Changes to Regulations	- Please use common sense and incorporate some flexibility in the grazing regulations. Provide sufficient flexibility to allow for adapting management approaches under differing conditions and locations without having to go through a new NEPA process. The overly prescriptive approaches of the current regulations do not provide the flexibility to do the right thing considering real-time conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bellwood	Samantha	Nevada Department of Agriculture	NV	1009	8	General Changes to Regulations	- Non-Renewable authorizations (permits and leases) o These authorizations can and should be used to address resource concerns, treatments, fuel loading, and maintenance of fuel breaks. These authorizations also require Proposed Decision and Protest period like renewals, extending the timeframe and delaying management actions. There is a necessity to provide additional options to address resource concerns, vegetation treatments, fire recovery, and fuel loading in a timely fashion. Issuing permits without additional analysis and decision time to assist permittees in managing livestock in concert with changing environmental conditions (i.e. wet years where production is high).
	Menges	Jeff		AZ	1460	1	General Changes to Regulations	- 10 yr permits should be catagorically excluded from NEPA, for renewal. - Section 4 permits for range improvements should be reinstated as stated in Sec 4 TGA - Standards & Guidelines should be removed and replaced with science-based monitoring - Range improvement permits should be categorically excluded from NEPA as soon as cultural clearance is complete.
	ST AUGUST	PATRICIA		WA	14	1	General Changes to Regulations	Unauthorized grazing – the notice suggests that the BLM should adopt new regulations for informally addressing unauthorized grazing, meaning that instead of complying with existing regulations to document violations and assess penalties, the agency will likely come up with a way of hiding what it knows about grazing trespass or overuse.
	Little	David		NV	777	1	General Changes to Regulations	Trailing of livestock is essential to the production of livestock. Regulations should be made to make trailing livestock efficiently and effectively for the permittee.
	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	5	General Changes to Regulations	The utilization of different billing schedules and setting scheduled billing based on permitted season of use, with the ability to adjust billing date to account for actual use, would allow billing to be spaced out and would automatically trigger when the permittee was confirmed to be off the allotment. However, the BLM must also set a fair and equitable grazing fee based on comparable private land prices.
	Petersen	Ray	Emery County, UT	UT	1313	2	General Changes to Regulations	The BLM should empower its range personnel to make rapid, science-based decisions to authorize early on dates or late off dates, as conditions allow. The NEPA analysis for a BLM 10-year grazing permit should consider the environmental impact of early on dates and late off dates during favorable years, so that no additional NEPA analysis would be necessary to authorize such flexibility when favorable conditions occur.
	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	22	General Changes to Regulations	The BLM should also explore voluntary grazing retirement, and long-term non-use opportunities with permittees to determine an equitable means to achieve a fairer allocation of resources for wild horses and burros and conservation purposes on public lands. The BLM has a statutory mandate to protect wild horses, while livestock grazing is permitted only at the discretion of the Interior Department. Livestock grazing is not required to fulfill the agency's "multiple use" mandate. Further, it is far more cost effective to curtail taxpayer-subsidized commercial livestock grazing in this area than it is to permanently remove wild horses from the range.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
	Schultz	Brad		NV	1327	1	General Changes to Regulations	Targeted Grazing for Fuel Reduction: Why is the goal to maintain fire fuels reduction with grazing up to the start of the fire season? That statement suggests that once the fire season starts (for which the specific conditions are not defined) targeted grazing ends. Fuels issues are a 12-month problem and need 12-month solutions. There is no reason that grazing cannot occur on fuel breaks or areas adjacent to them during the fire season. In many areas, high fire danger can last into early winter. When plants become dormant in summer and remain so in the fall and early winter, the dormant growth stage provides an opportunity for grazing to remove residual fuels that will carry over to the next year. Yet, one is still in the current fire season, and the language provided in the Fact Sheets would preclude grazing during this period. Grazing in the spring, when the plans are actively growing, but typically before the fire season starts, may be the most detrimental period to graze, especially if the grazing occurs year after year with intensities greater than 50%. The grazing management literature is replete with research that concludes repeated use during the boot stage is when grazing is most detrimental to bunchgrasses. The language used is critical as inaccurate or improper language ultimately creates legal constraints. If targeted grazing is implemented it should never be based upon hard off and on dates. Start and end dates of plant growth at the same site can vary by at least 2-3 weeks across years, sometimes even more. Grazing decisions should focus on plant growth stages growth stages and physiological needs of the desired plants at each growth stage. These seldom if ever correspond to a hard date. Dates may make some decisions simple and easy, but grazing management, regardless of the intended goal, is not a simple and easy process. Hard dates over simplify a complex process and lead to less successful outcomes.
	Petersen	Ray	Emery County, UT	UT	1313	3	General Changes to Regulations	Similarly, Temporary Non-Renewable ("TNR") Animal Unit Months ("AUMS") should be readily available as a tool to managers when favorable precipitation events occur, when successful fire rehabilitation happens, or when range improvement projects take place. If needed, a programmatic Environmental Impact Statement ("EIS") for all of the BLM should be conducted to make TNR AUM's available for managers to use. Just as AUM's can be cut for resource protection, AUM's should also be able to just as easily increase when conditions and resources warrant it.
	Federspiel	Mathieu		OR	751	1	General Changes to Regulations	Regarding Station 1, Updating and Modernizing Regulations: This section fails to mention the use of current best science in updating regulations. It also fails to recognize the need to maintain a healthy environment and regulate grazing for sustainable rangeland practices. The use of OBGA is strictly for grazing outcomes, not for the health of the total rangeland environment.
	Glasenapp	Logan	New Mexico Wilderness Alliance	NM	1040	2	General Changes to Regulations	Lands with Wilderness Characteristics (LWCs) and Areas of Critical Environmental Concern (ACEC) should be prioritized above consumptive uses of the land. We urge the BLM to make this clear in its grazing regulations by prohibiting grazing on inventoried or proposed LWCs and ACECs.
	Nelson	Ade	Kane County Commissioners	UT	1141	12	General Changes to Regulations	Kane County recommends that the BLM allow range cons and permittees to form grazing plans considering conditions on the ground and allow for using the most up to date evidence based on best practices for rangeland management. This type of flexibility would help with the management of invasive grasses and the promotion of soil health.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
	Fasano	Timothy	Pro Se Research, LLC.	NV	950	14	General Changes to Regulations	It is proposed that the U.S. COURT OF PRIVATE LANDS CLAIMS be re-instituted to specifically address the appealed claims of citizens and parties in direct correlation to the detailed issues to be heard before any state Land Claims Board. The subject matter jurisdiction of the said Court would be consistent with the previous courts approach and mission between 1891 - 1904 in settling such claims to settle ownership and rights issues of parties to specific parcels of now referred to public lands. Such proceedings before the Court shall be subject to and comply with the Federal Rules of Civil Procedure (FRCP) including but not limited to discovery and evidentiary hearings to establish pertinent and relevant facts to settle any disputed claims on such lands. In any event, any appeal from a decision of the said Court shall allow, as per the FRCP, for the permissible practice of appeal to the Federal Appeals Court, as a final appeal, in the district in which such action is initiated. In the event an appeal is not undertaken by any party to the action, the decision of the Court is binding upon all parties and the Land Claims Board shall be bound by the decision of the Court and the record of the proceedings shall reflect the decision of the Court.
	Little	David		NV	777	2	General Changes to Regulations	Improvements to pipelines and other water infrastructure (such as tanks, troughs, well improvements) are very difficult and timely (years) to gain approval from the BLM. Please remove obstacles that cause these difficulties. Please work better with permittees who want to improve their allotments and utilize their water rights.
	Miller	Stephen J.	Miller Land Co., Inc.	AZ	1484	3	General Changes to Regulations	I totally agree and support the concept of outcome based grazing. It will take some time to implement the rules and procedures. The range conservation officer will have to be involved more with the permittees in changing and approving movement dates and places. Permits will have to be amended or renewed with the concept. Flexibility will be a key factor.
	Black	Georgia	Reese River Valley, LLC	NV	1282	54	General Changes to Regulations	Grazing Permit Renewals. The grazing permit renewal process has become unworkable. The process is too expensive, slow, and complicated. Grazing permits should be considered as continuation of an ongoing process. Unless changes are being made to the permit, they should be renewed as a categorical exclusion.
	Little	David	Nevada Wool Growers	NV	776	2	General Changes to Regulations	Feral horses need to be managed differently. The influx of herd populations across the West have drastically affected the range negatively. Feral horses have disrupted the natural growing cycles of many areas of the range by overuse, often leaving the range vulnerable to invasive weed species. Feral horses have caused much damage to springs and other water sources due to their abuse. Regulations should be enforced and/or revised to properly manage feral horses on the range. Permittees should not be held responsible for the government's inability to properly manage these horses as directed by law. Permittees should be reimbursed for damage to their grazing allotments and water sources by feral horses.
	Helmuth	Peter		CO	1050	2	General Changes to Regulations	Expediting grazing authorizations as "a tool to reduce wildfire" or to "improve rangeland conditions."There is no positive correlation in the scientific literature that suggests grazing can achieve either outcome and a large body of evidence to the contrary, but it's clear that BLM seeks to expedite these types of permits under the guise that it will benefit public lands. In fact, grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
	Fasano	Timothy	Pro Se Research, LLC.	NV	950		General Changes to Regulations 6	Enrollment of Claim Upon the initiation of any practice to establish a database to detail the holdings associated to any public lands, it is proposed that a 24 month enrollment period should be initiated for private party stakeholders, either individuals or commercial enterprises, to place a claim, as delineated above, on any parcel of land currently under the management of the federal government. Once an applicant has enrolled their certified claim within the Department of Interior, the applicant shall have a period of 18 months to validate his claim through documentation by and through the herein after described process. However, the time limit stated would not apply if the issue is decided within a court of competent jurisdiction. Instead, the calculation of time would set aside such time before the courts and computed as to the processes only contained within the administrative processes before the Land Claims Board.
	Little	David	Nevada Wool Growers	NV	776		General Changes to Regulations 1	Consider opening up more possibilities to increase sheep grazing. Grazing sheep and cattle are complimentary to each other because sheep will graze certain plants that cattle will not and sheep will be able to reach areas of the range that cattle cannot. At present, cattle grazing is much heavier than sheep grazing. Creating more opportunities to graze sheep, such as allowing conversion from cattle AUM's to sheep AUM's, will benefit the range and the economy. Currently, the USA production of lamb cannot meet the demand of the USA consumer which forces suppliers to import foreign lamb.
	Little	David		NV	777		General Changes to Regulations 3	Cattle and sheep should not be held responsible for damage feral horses cause the range. Steps should be made in the rules to specifically analyze exactly what has caused the damage. Permittees should be reimbursed for allotments that are over the AML.
	catlin	james	Sierra Club	UT	1085		General Changes to Regulations 13	Because of the problems seen in data quality and the lack of peer review, additions are needed to these regulations that require the gathering objective information free from conflicts of interest and that they be used in making grazing decisions. For significant issues, these regulations should establish special teams of independent objective scientists and experts. These teams would be convened to evaluate possible remedies following protocols that eliminate conflicts of interest in such teams.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mori	Peter	Mori Ranches, LLC		1149		General Changes to Regulations 4	4) It is important that base property is attached to a grazing permit. In our opinion this gives some assurance that the permit will not fall into transient hands, and therefore less emphasis put on good stewardship of the land. Usually ownership of the base property (ranch) is a long term commitment to both the permit and the allotments, resulting in rangeland health and maintenance of fences and allotment improvements.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wysser - Martin	Colleen		GA	104	1	General Changes to Regulations	<p>* Allow for grazing permit retirement and long-term non-use for conservation purposes. * Create no new categorical exclusions and expand use of EAs and EISs. * Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. * Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis. * Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. * Ensure grazing management does not impede grazed lands from serving as habitat for native predators. * Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. * Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. * Forbid destruction of native vegetation to increase forage for livestock. * Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. * Include water quality monitoring as part of the land health evaluations. * Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit. * Disclose underlying Indigenous land claims and address environmental justice issues. * Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands. * Require use of the best available science in livestock grazing decisions. * Set a fair and equitable grazing fee based on comparable private land prices.</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	22	General Changes to Regulations	<p>"Fiscal Year 2017, BLM introduced Outcome-Based Grazing Authorizations, an initiative designed to offer greater flexibility to adjust grazing management under for its rangeland management program on BLM-managed lands." At this time, a number of demonstration projects are underway to promote Outcome-Based Grazing (OBG). Lead by sophisticated consultants and progressive ranchers, meetings with BLM and some key ranchers have been held in Nevada for the past two years. In Nevada, an influential group involved in this is called Results Oriented Grazing for Ecological Resilience (R.O.G.E.R.). This collaborative group of 50 agency staff and ranchers is claiming to promote "ecologically sound management" through adaptive management. R.O.G.E.R. argues that BLM's grazing program lacks the flexibility they think is needed. R.O.G.E.R.S. describes OBG as "(r)ather than stipulating prescriptive terms and conditions that interfere with timely grazing management adjustments, the intent is to develop permits in a manner that allows operators to demonstrate their ability to achieve habitat and vegetative objectives by providing them the flexibility to exercise their knowledge, experience and stewardship through flexible numbers of AUMs and dates of use and the ability to install and maintain infrastructure in a timely manner." The aim appears to be to replace objective data collection, ecological health standards, and public involvement with rancher common sense. A number of potential legal issues have already been raised. It would be a mistake for BLM to develop commitments based on the recommendations from these "ecological" ranchers without early involvement with the conservation community.</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burton	David		UT	1057	1	General Changes to Regulations	- It is important that decisions are allowed to be made on a local level. The field offices need to work closely with local individuals. This will help there to be a better understanding of the needs of the local resources and people. - Every area needs to have flexibility that allows for decisions based on different topography, climate, ecosystems, ect. Right now there are blanket policies that do not work for all situations. Each area is different than the next and this needs to be considered. - Ranchers should be allowed to propose potential projects and give input on other projects. They know the land and resources thoroughly as they work with them through their operations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlson	James	Montana Natural Resource Coalition		1342	22	General Changes to Regulations	issue. Using livestock grazing to mitigate wildfire risk. Explanation: Evidence demonstrates that intentional use of livestock grazing lowers wildfire risk on rangelands. 43 CFR § 4190 should include a program for the use of livestock grazing for the reduction of fuel loads, seasonal establishment and maintenance of fire breaks and protection of public rangelands resources and environmental quality. The program should be designed to provide increased grazing flexibility during droughts and should include provision for immediate effect permitting in response to emergency needs during high or extreme wildfire risk situations. Criteria: NEPA/CEQ: 42 USC § 4321. Congressional declaration of purpose - "... To declare a national policy which will encourage productive and enjoyable harmony between man and his environment; to promote efforts which will prevent or eliminate damage to the environment and biosphere and stimulate the health and welfare of man ..." 42 USC § 4331. Congressional declaration of national environmental policy - (b) in order to carry out the policy set forth in this chapter, it is the continuing responsibility of the Federal Government to use all practicable means ... to improve and coordinate Federal plans, functions, programs, and resources to the end that the Nation may-... (3) attain the widest range of beneficial uses of the environment without degradation ... or other undesirable and unintended consequences ..." 43 CFR Part 4100: Subpart 4190 - Effect of Wildfire Management Decisions - The current version is unnecessarily limited in scope in that it does not include the use of livestock grazing as a principal methodology: 43 CFR 4190(a) - "... Wildfire management includes but is not limited to: (1) Fuel reduction or fuel treatment such as prescribed burns and mechanical, and biological thinning methods ..." Inclusion of livestock grazing will not only protect rangeland resources but will also comply with mandates protecting the livestock industry. TGA: 43 USC § 315a - "The Secretary of the Interior shall make provisions for the protection, administration, regulation, and improvement of ... grazing districts ... and do any and all things necessary ... to preserve the land and its resources from destruction or unnecessary injury, to provide for the orderly use, improvement, and development of the range..." PRIA: 43 USC § 1901 - Congressional findings and declaration of policy - "(a) The Congress finds and declares that- ... (3) unsatisfactory conditions on public rangelands present a high risk of soil loss, desertification, and resultant underproductivity for large acreages of the public lands ... [and] prevent expansion of the forage resource and resulting benefits to livestock and wildlife production ... (4) the above-mentioned conditions can be addressed and corrected by an intensive public rangelands maintenance, management, and improvement program involving significant increases in
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sedman	James	North Platte Valley Conservation District	WY	799	3	General Changes to Regulations	Noxious weed and prairie dog control on BLM land should be a priority. Often times the BLM land in an area is the problem in an area as far as repopulating surrounding land with problem weeds and pests.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cotter	Justina		AZ	437	4	General Changes to Regulations	Land health recommendations: 1. Create no new categorical exclusions and expand use of EAs and EISs. 3. Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway. 4. Ensure that the Land Health Standards are evaluated at least once a decade using peer-review scientific and quantifiable methods. 5. Include water quality monitoring as part of the land health evaluations.Lastly, BLM should disclose underlying Indigenous land claims and address environmental justice issues.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sedman	James	North Platte Valley Conservation District	WY	799	4	General Changes to Regulations	10 year leases, an emphasis on continuity, and easing of restrictions on transferring a grazing lease should be a priority. We feel land is better managed by family operations with a long term emphasis and provides for better opportunities for all stakeholders, including recreation, wildlife, and others.
Permitting/Leasing Process								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyde	Michael	Duchesne County	UT	721	3	Permitting/Leasing Process	We applaud the BLM for considering streamlining opportunities, such as using different billing schedules for different allotment sizes, eliminating the protest period for permit and lease renewals and expediting the approval of permit or lease transfers when the only change is the name of the permittee or lessee.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	17	Permitting/Leasing Process	The comments above regarding variable billing schedules and grazing permit effective periods based on an allotment's selective management categorization, automatic renewal or transfer of permits pursuant to section 402(c) of FLPMA without the need to issue a decision, crossing authorization provisions, temporary nonrenewable use authorization provisions, targeted grazing provisions, flexibility provisions, and unauthorized use provisions would all be expected to increase permitting efficiency.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Back	Gary			1207	8	Permitting/Leasing Process	The billing process also needs to be streamlined.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	HANSEN	NIELS		WY	794	1	Permitting/Leasing Process	Renewal of Grazing Permits: the grazing regulations should be streamlined to allow more timely renewal of the Ten Year Grazing Permits. The use of Catigorical Excusions should be more widely used in situations where there are no changes in the use or Terms & Conditions and also when any changes are minor or done to make better use of livestock grazing for treatment of invasive species and fuel management in fire control
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ure	Amy			1352	7	Permitting/Leasing Process	Permit transfers and renewals have been a source of frustration at times due to the length of time it has taken to process the transfer. It would be of great benefit to have strict timeframes implemented to ensure a timely and expeditious process.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barta	Stacey		MT	1220	1	Permitting/ Leasing Process	Permit delays: NEPA for grazing permits are not happening in a timely and efficient manner. The NEPA process relating to grazing permits needs to be more efficient and timely to be effective. NEPA documents need to be clear and concise. Approval of projects on or across BLM allotments is taking too long and having an adverse effect on conservation practices that occur on BLM and private ground.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cram	Jennifer		CO	793	1	Permitting/ Leasing Process	Grazing authorizations should not be expedited - grazing has clear adverse impacts on public land and the authorization procedure needs to increase not decrease, the review and permitting process. The chance and timelines for the public to protest and appeal should NOT be decreased
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harris	Donna		OR	701	4	Permitting/ Leasing Process	Economic analysis should be conducted with any permit renewal, such as funds from grazing fees vs. the cost of administering the Permits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	449	8	Permitting/ Leasing Process	This proposal would reduce full and comprehensive environmental analyses and eliminate public participation and opportunities to comment. This is a thinly disguised attempt to reduce oversight of impacts of grazing and reduce agency time and efforts expended to regulate permits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Snyder	Phyllis		CO	964	2	Permitting/ Leasing Process	There should be coordination with US Forest Service grazing lands where a permittee is utilizing both public lands grazing programs. It is important that timing of the movements on and off of these coordinating permits doesnt create a lag time that the permittee would have to find a third alternative feed/grazing option. There is continued conflict with recreation and special interest groups. Permittees who are operating their permit under their operating guidelines should not be facing armed officers any time an outside party questions their actions but instead this should be handled administratively.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoffman	Ted		ID	1021	5	Permitting/ Leasing Process	The complete process of decision making regarding natural resources by federal bureaucrats should be re-evaluated. One possible solution would be to enable permit-holders to ask for a scientific review of a decision affecting their permit, where decision -makers would be required to demonstrate that the preponderance of existing range science supports their determinations and management changes. Or permittees could ask for a review by agencies with superior reputations for using good science such as the Natural Resources Conservation Service, local land-grant colleges with range programs and their extension services, or state agricultural and land management agencies.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	449	7	Permitting/ Leasing Process	Proposing to limit Public involvement to become informed and comment on proposed grazing leases and other alterations to BLM lands to convenience or favor grazing permittees or BLM actions to support them is unacceptable and thwarts the intent of the National Environmental Protection Act (NEPA).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	30	Permitting/ Leasing Process	Part 4130.2, Grazing permits or leases: Please add language that would make the permit renewal process much more efficient. The WSGB comments that the AO should have the flexibility by Regulation to determine the level of environmental assessment he/she needs to conduct in order to renew a Section 3 grazing permit. A CX option to the AO should be specifically allowed in the Regs for a "no significant change" in terms and conditions, for trailing permits that do not exceed the carrying capacity of the BLM area to be crossed, temporary nonrenewable licenses, or non-significant changes in numbers of active AUM's ". The WSGB also recommends that language be placed in the new Regs that the terms and conditions in a permit renewal convey any flexibility that has been agreed to between the BLM and permittee. The WSGB comments that this Section is also the place to include a Regulatory authority to include "Outcome Based Grazing" concepts in the terms and conditions of a grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Campbell	Marcia		WY	1111	3	Permitting/ Leasing Process	For leases held since the Taylor Grazing Act, and if conditions are good on the lease, there should be an expedited renewal method for possibly more than 10 years.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Otley	Susan		OR	1486	2	Permitting/ Leasing Process	When a permit has a change of ownership, there should not need to be any paperwork other than changing the name on the permit and seeing to it there is base property connected to the permit. These permits already have gone through the process and will again when ten years have passed and they are to be renewed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	11	Permitting/ Leasing Process	We support the principle of changing whatever necessary regulations that are needed to be corrected to provide for any livestock grazing permit that is being renewed and does not increase the preference by more than 10 percent that a categorical exclusion be provided which does not require an Environmental Assessment (EA) or and EIS. Likewise, once an allotment management plan, watershed management plan or any other applicable plan has been approved, range improvements necessary to be used in implementing that plan within the scope of the plan are not new decisions to be dealt with through administrative appeals or National Environmental Policy Act analysis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Vonda		NM	899	2	Permitting/ Leasing Process	We live in an area dominated by oil extraction. When an oil well location is permitted, we are not consulted on whether or not such location is removing an essential part of our grasslands and we receive no monetary compensation, even though we are the surface owners and the ones who are most affected. We lose vital forage for livestock and wildlife alike. Allotment owners must be included in the decision making process when related to grazing on their allotments and including, but not limited to, exchanges-of-use carrying capacity, crossing permits, designated recreation areas, mining, and mineral extraction. Current regulations disregard meaningful consultation, cooperation, and coordination with allotment owners and lessees.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doig	Cody	Wyoming CLG/Moffat/Daggett	CO	1062		Permitting/Leasing Process 4	Under the current rule, the authorized officer must consult and cooperate with "interested public," issue a proposed decision, provide a protest period, and resolve those protests all to allow a temporary (e.g. one-time) extension or access to a pasture or available forage. Id. This process is flawed as is demonstrated in Wyoming in several different projects. For example, the Pinedale Field Office recognized the need for a TNR permit when there is above average snow pack which affects the dates when permittees may leave BLM allotments for higher elevation U.S. Forest Service allotments. See File Code DOI-BLM-WY-D010-2017-0085). Only if conditions precedent were met, would the PFO issue the TNR permit. To approve the TNR permit, the BLM completed a programmatic Environmental Assessment, which began with scoping in March of 2017 and a final decision that was issued in August of 2017. The EA was protested by an anti-grazing group, and the same group appealed to the Office of Hearings and Appeals. Western Watersheds Project v. Bureau of Land Management, Docket No. WY-100-2017-02 . The BLM's Motion for Summary Judgment was granted by the Administrative Law Judge on May 1, 2019. BLM completed a 51 page environmental assessment, 15 page response to comments to WWP alone, 3 page protest response, 3 months of analysis and cooperation with counties, conservation districts, and other stakeholders, and the final decision was upheld only after an appeal to OHA. Any adaptive ability of the BLM to manage grazing as the range changes or as weather permits in the Pinedale Field Office is lost with the NEPA procedures and administrative remedies which allow groups like WWP to tie the agency's hands. The Coalition and Counties would recommend that TNR permits be issued without a categorically excluded decision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hanson	Brock		WY	1417		Permitting/Leasing Process 1	There appears to be a need to cut back on time and money spent on lease transfers, renewals, etc. Presently, when a rancher leases a neighbors base property, the BLM lease on that ranch needs to be transferred to the new lessee. To save time and money to the BLM, we could do like was done before, (when there was an unfounded fear of someone profiting from the lease). The new lessee could just lease the base property and pay the lessor. The lessor ranch can continue to pay the BLM lease as it receives billings. The time and money saved would exceed the lease money, in most cases, at least in our area. Some people, are still doing this, I suspect, although it is against regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984		Permitting/Leasing Process 7	The 'interested party' comments should never carry more weight than the 'affected interests' comments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	Wyoming State Grazing Board	WY	1387		Permitting/Leasing Process 4	Public involvement: means the opportunity for participation by affected citizens and the interested public in rule making, decision making, and planning with respect to public lands, including public meetings, or hearings held at locations near the affected lands, or such other procedures as may be necessary to provide public comment in a particular instance. (See item (d) in the FLPMA under Section 103 Definitions.)

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	40	Permitting/ Leasing Process	BLM's process to renew grazing permits is too complicated, costly, and time-consuming, as evidenced by the significant backlog and strained budgets. The regulation must make clear in Part 4100 that a permit renewal that does not increase permitted use by more than 10% should be processed under a categorical exclusion. This type of renewal is routine, does not contain significant changes, and therefore does not require an environmental assessment or environmental impact statement. Furthermore, once an allotment management plan is approved, range improvements undertaken as part of implementing that plan are not new decisions subject to administrative appeals or further NEPA analysis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schuldt	Cheryl	North Blaine Co Coop State Grazing District	MT	957	2	Permitting/ Leasing Process	The easiest way to streamline the efficiency of the BLM permitting process is to increase the duration of a grazing permit from 10 to 20 years in length.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	26	Permitting/ Leasing Process	Permit and Lease Flexibility, provide permittee flexibility to manage for fluctuations in weather or accommodate other management needs. o There has been much contemporary discourse about providing for sustainable permittee flexibility to manage for fluctuations in weather or accommodate other management needs by implementing an adaptive management framework. Perhaps the BLM needs to create manual or handbook guidance regarding the adaptive management process and include references to such guidance in the revised regulations as appropriate, or needs to establish such guidance directly through the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Johanna		ID	962	1	Permitting/ Leasing Process	Work to broaden interest in our public lands rather than continuing to keep activities on them so secretive: facilitate greater levels of public engagement, post monitoring reports online for public review, invite the interested public to attend field visits, and notify the public of all grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	7	Permitting/ Leasing Process	While the NEPA process is cumbersome and often unnecessary there are other issues in requesting new construction. The BLM is often not forth coming to the permittee in the requirements or applications necessary to do a new infrastructure project.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	17	Permitting/ Leasing Process	While improving the timeliness of permit processing and associated environmental reviews is absolutely warranted, "streamlining" the scope of public participation or the scope of actions subject to appeal is not. BLM should not adopt any rule changes that eliminate the interested public's ability to participate in grazing management decisions on public lands, including the right to protest and appeal such decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Snyder	Phyllis		CO	964	1	Permitting/ Leasing Process	When there is no changes being made to grazing permits at the time of the renewals, the process should be streamlined and should not require public comment period which drags out the time it takes to complete the renewals.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	10	Permitting/ Leasing Process	When a crossing permit is needed, authorization shall be granted under a Categorical Exclusion if the forage to be consumed during the trailing does not reduce or otherwise affect the existing permitted use of the area within the crossing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Ben		AZ	598	1	Permitting/ Leasing Process	What are the requirements to obtain an interested public status? There are none. This fact is detrimental to the efficiency of NEPA process, and troubling from a stakeholder standpoint. Special interest groups continue to log the process down with protests and appeals with the allusion that they are representing the public, and not a select few. The protests, appeals and litigious decisions are used as a tactic for special interest groups in order to reduce the efficiency of the allotment owner. Likewise, if the owner of a grazing allotment does not want their neighbor to have cattle, they can protest, appeal, and delay the process for years, because there are NO REQUIREMENTS for interested public status.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Farrand-Bernardin	Shannon		MA	408	1	Permitting/ Leasing Process	We, the public, deserve more, not less, of a say in grazing decisions on public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kruse	Joe		WY	1037	1	Permitting/ Leasing Process	We would like to see an easier and more streamlined process to improve BLM lands. Currently, it could take up to five years to get apporoval for fences or water projects crossing or on BLM lands. I would like to see this period of time much shorter.Staffing at BLM field offices can be frustrating as well. Our current BLM person is great, however, his predecessor left the office in a mess and lost permits essential to our operation. Luckily we had copies of these permits. These employees should be fired, not moved and promoted, as she was.Lesseees need more of a say in AUM's allowed and those that go above and beyond by monitoring their rangeland annually and implementing rotational grazing systems, should be rewarded.ckily we had copies of these permits. These employees should be fired, not moved and promoted, as she was.Lesseees need more of a say in AUM's allowed and those that go above and beyond by monitoring their rangeland annually and implementing rotational grazing systems, should be rewarded.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Culver	Nada	National Audubon Society	ND	1294	2	Permitting/ Leasing Process	We urge the BLM not to further restrict review and input regarding additional categories of activities and management of grazing permits and leases.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Crowder	Jessica	Western Landowners Alliance	WY	1082	1	Permitting/ Leasing Process	We recommend the BLM consider lengthening permits for those producers who are cooperating with the BLM to implement outcome based grazing/land management on their allotment(s).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	23	Permitting/ Leasing Process	We offer the following suggestions: * BLM should clarify that a permit renewal that does not increase permitted use by more than 10% is a Categorical Exclusion that does not require an Environmental Assessment or an EIS.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Boyd	Wanda		CO	1035	1	Permitting/ Leasing Process	We have a good working relationship with our BLM personnel and have no complaints about our actual grazing program, but it seems the red tape and paper work required to do any new water projects or land treatments is a definite hindrance to accomplishing new improvements. We would like to see the administrative area of the BLM simplified. It is also important to have well trained personnel to work with the ranchers, and the key word there is "with", everyone gaining insight from each other and continuing to use grazing as a tool toward soil health.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mickelsen	Don		ID	867	1	Permitting/ Leasing Process	We find that when grass is slim we are reduced which makes sense but when it is in abundance we are given no leway to increase. The antiquated allotment numbers are wrong as well. Good grass is limited in numbers and poor grass is overloaded. We need some better means of getting things done in the interest of the land rather the interest of the people managing the land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Robinson	John	Idaho Conservation League	ID	1341	12	Permitting/ Leasing Process	We also recommend that the BLM and permittees host more field trips for the public to show what is and is not working and how the permittees and BLM are responding with adaptive management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	1	Permitting/ Leasing Process	Through "streamlining" the permitting process, there is an increased potential for a lack of accountability and environmental abuse. The public notice for these proposed revisions indicates that BLM plans to adopt"streamlined" procedures for its regulatory grazing scheme.1 "Streamlining" the regulatory grazing scheme will lead to less oversight and more unauthorized grazing. It appears from the public notice that this streamlining will be accomplished in part by reducing public participation so as to not "unduly burden" the administrative process. In turn, BLM has identified "expanded or clarified use of the National Environmental Policy Act (NEPA) categorical exclusion authorities" as a means to "improve permitting efficiency."2 1 Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Revisions of grazing Regulations for Public Lands, 85 Fed. Reg. 3410 (Jan. 21, 2020). 2 Id. at 1311.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Vivian		NV	1134	6	Permitting/ Leasing Process	Those who own the range rights, or use the land should be the ones who have a voice in range management. This should not be open for public opinions from those who are uninvolved, or far removed from the ranching industry. Their input should not carry equal weight in any management decisions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	581	3	Permitting/ Leasing Process	They should not create new categorical exclusions and should maintain or expand the use of Environmental Assessments and Environmental Impact Statements. BLM should notify the public of all grazing permit decisions and offer greater access to public engagement by posting monitoring reports for review and inviting the interested public to participate in field visits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Naples	Jean		NY	386	1	Permitting/ Leasing Process	There should not be any creation of new categorical exclusions but the use of EAs and EISs should be expanded. There should be greater, not less, levels of public engagement including posting monitoring reports, inviting the interested public to attend field visits and notifying the public of all grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	2	Permitting/ Leasing Process	There should also be a regulatory limit on how long a NEPA process can take. Some of UCCA members have been waiting several years to have a project approved. On many allotments there has been NEPA work completed for other projects such as oil and gas. The previous NEPA work should be used as often as possible to approve these projects. When possible, several projects should be bundled into one NEPA to increase efficiency.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klingel	Jon		NM	846	4	Permitting/ Leasing Process	There needs to be a thorough assessment of each allotment and it needs to be documented in an Environmental Assessment (EA), or where appropriate, a full Environmental Impact Statement (EIS) under the National Environmental Policy Act of 1969 (NEPA). The EA or EIS needs to be public with significant time for the public to comment, and if needed to protest or appeal. The full vegetation assessment also needs to be public and maintained on-line. The NEPA assessment needs to include the impacts to wildlife (all wildlife including predators, not just listed species), habitat, streams, riparian, water quality, native plants, soil, carbon sequestration, and climate change. Monitoring of allotments also needs to include the above (e.g., water quality, streams, riparian, wildlife, native plants, habitat, etc.).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	14	Permitting/ Leasing Process	There has been much contemporary discourse about providing for sustainable permittee flexibility to manage for fluctuations in weather or accommodate other management needs by implementing an adaptive management framework. Perhaps the BLM needs to create manual or handbook guidance regarding the adaptive management process and include references to such guidance in the revised regulations as appropriate, or needs to establish such guidance directly through the grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tomera	Dan	Lander County Public Land Use Advisory Planning Commission	NV	1405	2	Permitting/ Leasing Process	There are countless instances where rangeland improvements have been applied for and have been delayed for years or outright denied by the BLM. The process to approve a beneficial range improvement needs to be streamlined. Potentially, the regulations regarding Categorical Exclusions could be revised. This would allow the district offices the ability to approve a project in a more timely manner.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cargill	Emilia	GEYSER CATTLE COMPANY LLC	NV	1255	3	Permitting/ Leasing Process	The time and quantity of data required to process a range improvement project through NEP A should be dramatically reduced. If a Permittee proposed project benefits the range and encourages, expands, adds more, or supports sustainable rangeland use by a Permittee and its grazing herd, it should be approved expeditiously, and expeditiously should mean "within 60-days or less."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Correll	Leanne	SER Conservation District	WY	1066	6	Permitting/ Leasing Process	The SER CD appreciates the BLM's efforts to streamline the grazing permitting process. It should not take as many years to process the permit as the specified length of the permit. We would urge the BLM to change the permits renewal cycle to every 20 years instead of the current 10-year cycle.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	28	Permitting/ Leasing Process	The regulations should require, in coordination with ranchers, management decisions are based upon the best rangeland science, that flexibility is built into grazing permits to allow for adaptive management as issues and concerns arise, and that that quality and quantity of data collected can support all decisions made. The regulations should ensure that every feasible option is pursued before any restrictive action is taken against grazing. The regulations should ensure grazing decisions use the least restrictive and most economically beneficial alternatives that would still effectively accomplish resource objectives
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mariluch	Angie			1212	6	Permitting/ Leasing Process	The regulations need to curtail the permitting process. The red tape that is involved in the BLM issuing a 10-year permit is not only ridiculous, but expensive. They have been working on our 10-year permit for 4 years and they are not finished to date.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Packer	Patti		NY	311	1	Permitting/ Leasing Process	The public deserve more, not less, of a say in grazing decisions on public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Swasey	Amber	Mesa County	CO	822	6	Permitting/ Leasing Process	The process of grazing permit renewals is too complicated, costly and time-consuming. If a permit renewal does not increase or decrease permitted grazing use by more than ten percent, a Categorical Exclusion that does not require an environmental assessment or environmental impact statement, is appropriate.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry and Diane		MT	960	5	Permitting/ Leasing Process	The process for permit and lease renewal, EIS's and EA's has become cumbersome and time consuming for BLM personnel. Environmental groups use litigation and a bombardment of comments along with demands for copies and justification for any decisions made, all of which adds unnecessary, unproductive workload and expense.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hawthorn	Pat		WI	486	1	Permitting/ Leasing Process	The People must be informed and given the opportunity to participate in the stewardship of our few remaining wild lands. The BLM proposes to improve “grazing permit administration” and “permitting efficiency,” increase the use of Categorical Exclusions and streamline the protest and appeals processes. To me, this spells out reduced environmental analysis and an attempt to limit opportunities for the public to be informed about and participate in grazing management decisions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cargill	Emilia	GEYSER CATTLE COMPANY LLC	NV	1255	2	Permitting/ Leasing Process	The length of time it takes to process a term-permit Renewal is excessive. The review and data process should be ongoing through the length of the permit term by the BLM staff range-consultants. This would mean that at renewal-time, the data gathering would be minimal and instead it would be a review of the data previously gathered and contained in the file. All such data collected by BLM should be photo or video documented and geo-tagged, in order that specific sites can be correlated to the actual location within the range.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Vonda		NM	899	3	Permitting/ Leasing Process	The land is not owned by the “public”, but is held in trust and managed for multiple uses on behalf of the public. That is why an allotment is known as a split estate. The public in general is not affected and we can attest with pictures of misuse that they do not care how they treat the land, and do not have a vested interest, nor do they have right, or title, as defined by the Taylor Grazing Act. The “interested public” should be removed from the equation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	25	Permitting/ Leasing Process	The grazing regulations should seek to streamline the process to approve and implement range improvements, particularly water development and distribution projects. Water is the limiting factor for most livestock operations across the arid west and limits the amount of habitat available to wildlife. Thus, a more development friendly regulatory framework would serve to allow the most limiting factor for both livestock production and wildlife populations to be addressed in a timely manner.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	1	Permitting/ Leasing Process	The grazing regulations should be grounded on the foundation of flexibility and adaptive management with a focus on outcome-based grazing. The regulations should be framed to recognize and leverage current rangeland science that has shown livestock grazing can actually help reach certain objectives such as riparian habitat enhancement, weed control, fire reduction and wildlife habitat improvement. We support any efforts to provide flexibility in grazing permits and to focus on these outcomes and not strict grazing dates, livestock numbers, and other rigid requirements.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Timothy		NV	1095	2	Permitting/ Leasing Process	The grazing permit renewal process is extremely lengthy and stultified. a simplified, streamlined process would make a 10-year renewal actually possible. Streamlining the process would allow for minor modifications, such as improving water sources, pipelines, etc.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Grue	Clinton		MT	1049	1	Permitting/ Leasing Process	The current timeframe for permit processing is too long, taking 5-7 years to process a 10 year permit limits possible management changes that would improve range health. Many permittees will just leave things as they currently are rather than go through the process.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mihal	Dianne	Stone Cabin Ranch, LLC		1326		Permitting/ 2 Leasing Process	The current timeframe for any studies including CX's creates an unrealistic on the ground implementation situation. For example a temporary water haul application needed due to drought conditions occurring in year X may not be completed until a year later during year Y. Therefore, these lengthy study timeframes don't allow real-time management tools to the agency for current situations to address an issue that may be impacting rangeland health. This has resulted in permittees being removed from allotments due to no other tools available by the agency or the tools available taking too long to implement in the needed timeframe. Streamlining some of these tools and providing guidance to agency personnel on options available other than removing permittees from their allotments would also be beneficial for rangeland health and agency/permittee relations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159		Permitting/ 29 Leasing Process	The comments above regarding automatic renewal or transfer of permits pursuant to section 402(c) of FLPMA without the need to issue a decision, crossing authorization provisions, temporary nonrenewable use authorization provisions, targeted grazing provisions, flexibility provisions, and unauthorized use provisions would all be expected to increase permitting efficiency.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355		Permitting/ 5 Leasing Process	the BLM should provide public notification of a transfer and opportunity to comment, and, if a CX is to be used, documentation supporting why the BLM feels extraordinary circumstances do not apply.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ingram	Jackie			1189		Permitting/ 4 Leasing Process	The BLM should provide an opportunity for public comment for the draft determinations and draft allotment assessment
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ingram	Jackie			1189		Permitting/ 6 Leasing Process	The BLM should prepare scoping document based upon the permit renewal application(s), and allow public scoping, including as to permit renewal application.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ingram	Jackie			1189		Permitting/ 5 Leasing Process	The BLM should notify permittee(s) to submit a permit renewal application. While it is appreciated that the permittee(s) may not know at the time of the application as to BLM's causal factor determinations, the permittee(s) will be given an opportunity to submit the permit renewal application.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ingram	Jackie			1189		Permitting/ 7 Leasing Process	The BLM should issue final rangeland determination and land use plan objectives determination, along with notice as to the permittee(s) and to the public of either of the following: 7. ? If there are no adverse determinations, and if the permittee(s) does not apply for any substantially new or different terms and conditions, BLM should provide notice to the permittee(s) and to the public that BLM will prepare a CX in due course, as authorized by the Federal Land Policy and Management Act, 43 U.S.C.&1752(h), and issue in due course a proposed decision to renew the grazing permit. ? If there are adverse determinations and/or if the permittee(s) applies for a permit with substantial new of different term, BLM should provide notice to the permittee(s) and to the public that BLM will prepare a NEPA document in due course for public comment. This notice should also ask the permittee(s) to submit any modified permit renewal application to be assessed in any NEPA document.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892		Permitting/ 5 Leasing Process	The BLM often quote policy as regulation and this creates confusion and contention with permittees. We believe the BLM should be clear to the permittee whether a regulation or policy is being quoted in a management decision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schultz	Nick		MT	1025		Permitting/ 1 Leasing Process	The BLM needs to be much more flexible with permittees that are passing the Standard and Guidline requirements. For example, the dates that livestock are allowed in or off public land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503		Permitting/ 3 Leasing Process	Takes too long to get approval for any projects either new range improvements or maintenance on existing range improvements. Part of the rules a permittee must maintain existing improvements but BLM delays or denies you so you can't do them.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Whyde	Don		WY	874		Permitting/ 1 Leasing Process	Surely there is a way to streamline billings, permits and lease renewals. Permits and Renewals for the same permittee that are in accord with Rangeland Standards and the NEPA documentation should be processed immediately; unless there is some significant change on the ground. Lease transfers are another matter. What if the the transfer is to a notorious bad actor? If BLM knows it and it is documented, I would recommend that the transfer not be made.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228		Permitting/ 10 Leasing Process	Subleasing -There is no legal authority for a surcharge to the grazing fee for subleasing. The current process that requires a base property lease and permit transfer for someone other than the base property owner to graze an allotment is unnecessary and inefficient. It wastes the time of agency personnel in processing documents necessary for the permit transfer that could be used for other things like collecting monitoring data. The permittee is still responsible for grazing management and can be held accountable for that management. As a practical matter, in most lease arrangements the lessee is already a permit holder on a nearby or neighboring operation. The prohibition of subleasing and the subleasing surcharge serves no useful purpose and should be eliminated.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mihal	Dianne	Stone Cabin Ranch, LLC	NV	1089		Permitting/ 3 Leasing Process	Studies: The current timeframe for any studies including CX's creates an unrealistic on the ground implementation situation. For example a temporary water haul application needed due to drought conditions occurring in year X may not be completed until a year later during year Y. Therefore, these lengthy study timeframes don't allow real-time management tools to the agency for current situations to address an issue that may be impacting rangeland health. This has resulted in permittees being removed from allotments due to no other tools available by the agency or the tools available taking too long to implement in the needed timeframe. Streamlining some of these tools and providing guidance to agency personelle on options availabe other than removing permittees from their allotments would also be beneficial for rangeland health and agency/permittee relations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mackay Dean	Shelley		MT	1380		Permitting/ 1 Leasing Process	Streamlining grazing permit processes as it is taking too long to implement. This is taking long man hours at the BLM level and affects management practices of the individual permittees. Leases could be extended to a 20 year cycle instead of the 10 year, which would eliminate time spent on paperwork.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoots	Marti			1213		Permitting/ 1 Leasing Process	Streamline NEPA Regulations to curtail time required to Update BLM Permits in response to antiquated timeline for grazing period
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff		AZ	1458		Permitting/ 1 Leasing Process	Section 4 permits for range improvements should be reinstated as stated in Sec 4 TGA
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chew	Scott H.	Chew Livestock, Inc	UT	1491		Permitting/ 9 Leasing Process	Section 15 leases; Again, there is enough experience, education, and ability to allow ranchers to run the permits without supervision under a lease. Leases and Stewardship Agreements would save BLM money that could be used for other purposes than regulating people and permits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harvey	Bill	Baker County	OR	747		Permitting/ 7 Leasing Process	Require allotment permit holders to: -Notify, BLM of noxious weed locations, especially newly discovered infestations -Keep wildlife-friendly fence in excellent condition -Provide annual, updated grazing plans and to follow those plans -Notify BLM of livestock trespass -Change salt/mineral block locations -Manage livestock distribution using range riders to keep cattle from lounging in riparian areas -Submit a self-monitoring report annually to the BLM

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	2	Permitting/ Leasing Process	Rather than eliminate the protest period for grazing permit renewals that are completed under a fully NEPA compliant process, consider establishing regulations for automatic renewal of permits pursuant to section 402(c) of FLPMA without the need to issue a decision or create a subsequent appeal process
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mihal	Dianne	Stone Cabin Ranch, LLC	NV	1089	4	Permitting/ Leasing Process	RANGE IMPROVEMENTS: NEPA for simple Range Improvemnets not being in line with the modern age and modern price point of these studies in general as well as EIS and EA timelines need to be addressed. These studies can be very lengthy and expensive and are being outsourced at the permittees expense in order to be completed. The mentality of if you want it done you will have to come up with the money yourself is not an option for most permittees. Range Improvements such as water improvements, maintenance, fences, corrals etc should be implemented under small actions and should not take 10 years due to personelle turnover etc or pushed off as "insignificant" by itself and then lumped into a larger action that will take 5-10 years.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Vivian		NV	1134	7	Permitting/ Leasing Process	Range improvements must be encouraged more, such as livestock waters and distribution systems. There is too much "red tape", and it is such a timely/costly thing to do at this time.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gould	Brandon	Diamond Cattle Co.	CA	1354	2	Permitting/ Leasing Process	Range Improvement Projects: We have invested substantial sums of money on range improvements on our allotments. The grazing regulations should be updated to facilitate working together in an efficient manner to get range improvements permitted and installed. We have had projects stalled for years waiting for approval, even though everyone was in agreement the project would benefit the resource and improve habitat. We encourage BLM to streamline the project approval process, particularly for water development projects. Water is the limiting factor for our desert operations and our projects benefit wildlife. Thus, a more development friendly regulatory framework would serve to allow the most limiting factor for both livestock production and wildlife populations to be addressed in a timely manner.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff		AZ	1458	4	Permitting/ Leasing Process	Range improvement permits should be categorically excluded from NEPA as soon as cultural clearance is complete.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Devlin	Todd			1120	5	Permitting/ Leasing Process	Public Access to all BLM managed lands should be protected and expanded where possible.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chew	Scott H.	Chew Livestock, Inc	UT	1491	10	Permitting/ Leasing Process	Public access should not be a condition for issuing a grazing permit; BLM has 1000's of acres of land that are surrounded by private land. Some in our area has been identified for disposal. All of it should be. There are many legitimate avenues BLM can use to acquire access across private land, however, this method is un-American, probably unConstitutional, and if not illegal, should be.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marks	Liz			1303	2	Permitting/ Leasing Process	Provide a categorical exclusion under NEPA for any additional environmental assessments related to livestock grazing on the basis that this is not a new agency action but rather a use based on preexisting rights and historical and customary use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Peila	William		OR	948	1	Permitting/ Leasing Process	Please consider putting stock wells on the list of grazing related CX authorities, because water is one of the most valuable tools to achieve domestic livestock distribution, especially in allotments that don't have any live water, only dirt tanks that are dependant on sufficient run off which doesn't always happen.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Molt	Melodi			1127	1	Permitting/ Leasing Process	Please consider expanding the list of grazing-related CX authorities to streamline the process and give the management power to the local range specialists. These decisions, regarding time, number of cattle, and frequency of grazing need made on a weekly or monthly basis. These decisions become ineffective over time. The individuals, who spend time with their boots on this land, need to be the ones to make time sensitive decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	41	Permitting/ Leasing Process	Permittees or lessee should have more flexibility to accomplish management objectives.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	8	Permitting/ Leasing Process	Permittees have also experienced a delay in proposed project approval because of a change in staff by the BLM. The new staff is often not brought up to speed on proposed projects causing delays. A possible solution would be to make changes in regulation that requires the BLM to have a uniform process for processing new construction request and a time limit for completion.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Sierra	Utah Wool Growers Association	UT	1145	3	Permitting/ Leasing Process	Permitted use: There is the opportunity to increase the BLM's flexibility in applying amended management practices (different grazing rotations, different on/off dates) rather than automatically decreasing the number of authorized AUMs on an allotment. Many producers have had their AUMs decreased based on factors that could have been addressed through different management practices-had that only been an option

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Prunty Rianda	Kyla		NV	902	1	Permitting/ Leasing Process	Permit transfers that only require a change of name should be exempt from the Proposed Decision process and NEPA. Often times permit holders are only transferring to a different entity name, and streamlining that process by removing excess paperwork would cut down on administrative workload. A 10 year minimum term on permits should also be implemented to alleviate repetitive paperwork.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Short	Robert	Converse County, WY	WY	1396	3	Permitting/ Leasing Process	Permit Renewal Process - Converse County encourages BLM to reassess the adequate level of NEPA necessary to renew a permit. If permits do not require any significant changes and the allotment is meeting Rangeland Health Standards and Guidelines, then the permit renewal should be conducted by utilizing a Categorical Exclusion (CE) verses an Environmental Assessment (EA). For example, consider categorically excluding permit renewals which do not increase or decrease permitted grazing use by more than ten percent. Furthermore, BLM should consider extending the permit terms from 10 to 20 years. This approach would also be more cost and time effective while reducing staffing resources needed to conduct NEPA that is not warranted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Sierra	Utah Wool Growers Association	UT	1145	2	Permitting/ Leasing Process	Permit delays: NEPA for grazing permits takes too long. There are other administrative delays as well. NEPA is bloated red tape at its best and takes an average of 4.5 years to complete. NEPA MUST be streamlined and bolstered to remove the sue and settle president which has been leaving rangeland neglected while subjecting communities who depend on federal lands to a constant state of limbo.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	7	Permitting/ Leasing Process	Permit and Lease Transfers, allow issuance of renewals that only change ownership name without the need to issue a decision or create a subsequent appeal process. o If a grazing permit transferred to a new owner's name remains subject to the terms and conditions that were previously in effect, it is essentially being processed pursuant to section 402(c) of FLPMA. Thus, consider regulations for automatic renewal of such permits without the need to issue a decision or create a subsequent appeal process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton		NV	1265	6	Permitting/ Leasing Process	Permit and Lease Renewals, consider implementing regulations to eliminate the protest period. o Rather than eliminate the protest period for grazing permit renewals that are completed under a fully NEPA compliant process, consider establishing regulations for automatic renewal of permits pursuant to section 402(c) of FLPMA without the need to issue a decision or create a subsequent appeal process. o Consider variable effective periods for grazing permits based on an allotment's Selective Management Categorization: I Category = maximum 10-year term (retaining the current effective period); M Category = 20-year term; and, C Category = 30-year term.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Walter	T Quarter Ranch	NV	1159	20	Permitting/ Leasing Process	Permit and Lease Renewals, consider implementing regulations to eliminate the protest period. o Rather than eliminate the protest period for grazing permit renewals that are completed under a fully NEPA compliant process, consider establishing regulations for automatic renewal of permits pursuant to section 402(c) of FLPMA without the need to issue a decision or create a subsequent appeal process.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Barr	Quinton	Badger Ranch and Chiara Ranch	NV	1309		Permitting/ 7 Leasing Process	Permit and Lease Renewals and Transfers, consider implementing regulations to eliminate the protest period and allow issuance of renewals that only change ownership name without the need to issue a decision or create a subsequent appeal process. o Rather than eliminate the protest period for grazing permit renewals that are completed under a fully NEPA compliant process, consider establishing regulations for automatic renewal of permits pursuant to section 402(c) of FLPMA without the need to issue a decision or create a subsequent appeal process. o Consider variable effective periods for grazing permits based on an allotment's need for intensive management (High = allotments with significant resource conflicts that have been selected for improvement in general or specific resource conditions; Low = allotments with no significant resource conflicts where existing resource conditions are selected to be maintained, and Custodial = allotments with a secondary component of intermixed public land or similar situations where the co-mingled public land is administered on a custodial basis): High Category = maximum 10-year term (retaining the current effective period); L Category = 20-year term; and, C Category = 30-year term. o If a grazing permit transferred to a new owner's name remains subject to the terms and conditions that were previously in effect, it is essentially being processed pursuant to section 402(c) of FLPMA. Thus, consider regulations for automatic renewal of such permits without the need to issue a decision or create a subsequent appeal process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	John	Petan Company of Nevada, Inc.	NV	1259		Permitting/ 3 Leasing Process	Permit and Lease Renewals and Transfers, consider implementing regulations to eliminate the protest period and allow issuance of renewals that only change ownership name without the need to issue a decision or create a subsequent appeal process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyatt	Leedru		NM	1436		Permitting/ 1 Leasing Process	-Permit & Lease Transfers: When issuing a permit to an inexperienced permittee, the first permit should be a 3-year probationary permit. Then after, 10 years if the permittee proves to be experienced and capable
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sedman	Bruce		WY	763		Permitting/ 3 Leasing Process	parcels within a specific allotment that have been canceled as part of a grazing lease (for whatever reason other than trespass) should not require a full restart of the NEPA process to resume grazing by an eligible adjacent leaseholder.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hagenbarth	Jim		MT	1003		Permitting/ 3 Leasing Process	One of the public land ranchers biggest obstacles is the inclusion of the interested public in management decisions because the public seldom has little range management knowledge and often does not give a damn. They tend to follow local activists who are using the ESA or NEPA to change use on grazing lands in the west for their personal gains. If they succeed in taking livestock off the grazing landscape in the west, the grazing landscape will be lost to brush and repeated fires. There is no one on the landscape that can replace the responsible management of the public land rancher and their livestock. It is imperative that public interest be limited to those that truley have an interest and knowledge of managing the range resouce.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982	24	Permitting/ Leasing Process	Once an allotment management plan is approved, range improvement implementing that plan within the broad scope of the plan are not new decisions subject to administrative appeals or further National Environmental Policy Act analysis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Gibson		UT	1233	1	Permitting/ Leasing Process	Often times the local range con who understands and works with the rancher lacks proper authority to make common sense decisions. Therefore things that make sense and are best for the land aren't done because of the complicated, lengthy process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	cUNNINGHAM	Kirkwood		CO	465	1	Permitting/ Leasing Process	Of course, modern grazing practices involving extensive fencing and short-rotation times MIGHT possibly restore some of the biological integrity of these lands, but they would be hard to implement on lands available to public access. If the BLM cannot guarantee range restoration in its grazing leases, then it needs to CANCEL the leases.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	France	Tom	National Wildlife Federation		1237	2	Permitting/ Leasing Process	NWF stresses the importance of public participation in decisions involving public lands. BLM should not limit public involvement in an attempt to streamline administrative processes. Furthermore, the issuance of grazing permits is the moment at which resource allocation decisions are made. NWF requests that the regulations specify how BLM will facilitate greater levels of public engagement including posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permits decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	4	Permitting/ Leasing Process	NRCS in my area told me they will not do any EQUIP projects on BLM because it takes too long to get approval for a range improvement. It should only take a couple months not years. Eliminate the red tape so things get approved faster.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	5	Permitting/ Leasing Process	NEPA has created huge regulatory burdens that make it very difficult to conduct many necessary activities. a. Getting permission to construct new range improvements has become nearly impossible. After cultural clearances are complete, range improvement construction should be categorically excluded from NEPA. b. 10-year permit renewals are now very difficult to get done because of the NEPA requirements. This process needs to be dramatically streamlined.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	17	Permitting/ Leasing Process	Livestock grazing on BLM lands is permitted, whereas many of the other multiple-uses are not, therefore ranchers need to be meaningfully included in the BLM decision making process because our families are the ones directly affected by those decisions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris			1188	10	Permitting/ Leasing Process	Limit or eliminate NEPA reviews in areas where activity such as grazing or logging are already permitted. Categorize dangerous fuel reduction activity and development under emergency and public safety rather than general grazing or logging, thus eliminating most legal challenges to this necessary activity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Parks	William	Sunnyside Livestock Co, LLC	WY	1393	1	Permitting/ Leasing Process	Land trade/swap/blocking should be simplified.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Ade	Kane County Commissioners	UT	1141	2	Permitting/ Leasing Process	Kane County recommends that all NEPA analysis for BLM 10-year grazing permits should consider the environmental impact of early on dates and late off dates during favorable years, so that no additional NEPA analysis would be necessary to authorize such flexibility when favorable conditions occur.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bulloch	Gordon	MBM Livestock	UT	752	1	Permitting/ Leasing Process	It would have been nice if the process had been much quicker. Six years seemed like an excessively long time. You purchase preference to utilize the Allotment and the time frame to get a NEPA action changed is tremendously slow.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sarman	Paul		NV	926	1	Permitting/ Leasing Process	It would be better if we could have flexibility with the aums we have to graze. We have an early turn out for our allotment which works well on most years. However, if we don't have warming temperatures early enough the grass doesn't grow. We don't turn our cows out until the grass is ready and consequently forfeit some aums. On those years, we could possibly graze longer at the end of the season. This would help with the health management of the grass and not have us losing out on aums. The way it is right now, the incentive is to put the cows out when the contract says, rather than good management of the allotment. There is also should be a consideration for wet years when lots of feed is left behind creating fire hazards.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	31	Permitting/ Leasing Process	It is imperative that flexibility be provided in not only the season of use, but other terms and conditions. For instance, many grazing permits have rigid utilization terms and conditions that work against adaptive management. Please analyze and include adjustments in utilization terms and conditions based on current rangeland science using studies such as Smith et al. (2005) as follows: * "Utilization is a useful tool in range management decision making, but utilization guidelines should not be used as management objectives. * Utilization, as defined by SRM and others, is not the same thing as "seasonal utilization" measured before the end of the growing season. Utilization guidelines cannot be used for seasonal utilization. * Utilization of key forage species, unlike overall utilization levels in a pasture or allotment, is an indication only of livestock grazing pressure, and is not necessarily related to any other resource uses or values. * Key areas for livestock grazing are areas selected to indicate the general level of livestock use over a management area. Utilization in key areas does not necessarily indicate impacts on other resource values or uses. * Setting a different proper use level for different range condition classes is not supported by research, at least within the bounds of conservative stocking levels currently recommended on public lands. There is no known basis for establishing different utilization guidelines for different classes of "range condition." * Utilization guidelines and estimation procedures applicable to grass ranges may be inapplicable or difficult to employ on ranges where much of the forage supply comes from shrubs and/or annuals. * Use of utilization to adjust stocking rates should be based on measurement of utilization made in the fall on ranges grazed during the growing season, and in the spring on winter or year- round ranges. Excess utilization over a considerable portion of the range over a period of several years may indicate a need to reduce stocking or make other management changes. Likewise, low levels of utilization over large areas and several years may indicate an opportunity to increase stocking. * Seasonal utilization should not be used as a rigid standard to trigger livestock moves or removal from grazing permits. Such actions should consider the operation of the entire management unit, including all land ownership, for the balance of the grazing year. Coordination across land ownership can enhance management of the landscape as a whole. * Some adjustment to livestock numbers and duration of use, based on seasonal utilization may be necessary, for stewardship of the resources when evaluated in conjunction with other factors. * Mapping of use zones and estimates of utilization to provide collateral information for long- term trend monitoring both provide information that is very useful in rangeland management planning."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	5	Permitting/ Leasing Process	Involving all interested public - from anglers to hikers to conservationists - will ensure that the varying interests of the American public will be considered in decisions affecting the management of our public lands and that the BLM will better adhere to the multiple use principle described in FLPMA. Keeping in mind all interested parties will also help to prevent management decisions on public lands which serve narrow interests, in this case the interests of ranchers and the livestock industry over all other potential uses.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hutchinson	Howard	Coalition of Arizona/New Mexico Counties	NM	1109	4	Permitting/ Leasing Process	Insuring regulations can be understood by allotment owners and management personnel so that those regulations are implemented fairly and objective decisions are reached;

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cascade	Robyn	Great Old Broads for Wilderness; Northern San Juan chapter	CO	1102	4	Permitting/ Leasing Process	Increasing the use of Categorical Exclusions and limiting opportunities for protest and appeals. Both these revisions will result in reduced public participation and opportunities for public input. As residents who live within agricultural communities, we adamantly oppose any reduction in public participation regarding the use and health of our federal lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	12	Permitting/ Leasing Process	Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	1	Permitting/ Leasing Process	In order to relieve some of the overload, there are some permit/lease renewals and permit/lease transfers that qualify for categorical exclusions (CE) and are excluded from the National Environmental Policy Act (NEPA) process. Yet, they both are still required to have a Proposed Decision and Protest Period. In following with this administration's policy of expediting and streamlining federal actions, when there are no extraordinary changes with the permit or lease, it would be prudent to reduce issuance time and eliminate the protest period. Categorical exclusions are provided in NEPA for just this purpose.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	15	Permitting/ Leasing Process	In addition, the BLM should strive to find meaningful ways to incorporate the public into the administration of its grazing program (e.g., in decision-making, monitoring, rangeland health evaluations).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	16	Permitting/ Leasing Process	In addition to providing for immediately effective decisions to provide for permittee flexibility to manage for fluctuations in weather or to address other management needs in association with Non Renewable Permits and Leases, similar provisions should be created to cover situations where permittees request authorization for additional forage use on an annual basis as temporary nonrenewable use under an existing BLM term grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hess	Carie	Petroleum County Conservation District	MT	1146	7	Permitting/ Leasing Process	Improving Permitting Efficiency. More timely action on permits. Recognize that the majority of grazing permits are routine and therefore qualify as a "categorical exclusion." Routine applications should be processed efficiently without undue hardship to the applicant. The agency in dealing with other than routine applications should solicit consultation and advise from local grazing district advisory boards and other units of local government who have jurisdiction and expertise in the region.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rodriguez	Shamaria	Rhoads Ranch	NV	1251	1	Permitting/ Leasing Process	If the season could be extended, it would benefit the range.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frank	Bobbie	Wyoming Association of Conservation Districts	WY	1222	3	Permitting/ Leasing Process	If permits do not require any significant changes and the allotment is meeting Rangeland Health Standards and Guidelines, then the permit renewal should be conducted by utilizing a Categorical Exclusion (CE) versus an Environmental Assessment (EA). For example, consider categorically excluding permit renewals which do not increase or decrease permitted grazing use by more than ten percent. Furthermore, BLM should consider extending the permit terms from 10 to 20 years. This approach would also be more cost and time effective while reducing staffing resources needed to conduct NEPA that is not warranted.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	36	Permitting/ Leasing Process	If agency staff can spend more time collecting data and less processing paper (i.e., conducting lengthy and unneeded analysis for permit renewals), but still reach valid conclusions due to an adequate decision support system then there is a positive feedback for both the agency and the operator. This approach also may create incentives for establishing more "cooperative permittee monitoring" efforts. Adequate monitoring data and its interpretation is one of the greatest roadblocks to permit renewal. If there is a rapid process for permit renewal, and the permittee believes the process is valid, they may be more inclined to take an active role in collecting monitoring data. That would be a win-win outcome.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Jeremy		OR	931	3	Permitting/ Leasing Process	If a turn out date needs to be adjusted it should be able to be a decision made between by the blm and the permittee.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	8	Permitting/ Leasing Process	If a rancher is willing to do things like rotational grazing, brush control, grass seeding, water improvements, fencing improvements, wildlife improvements and take a proactive approach then the rules need to less restrictive to allow some out of the box thinking that benefits the rangeland.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	4	Permitting/ Leasing Process	If a grazing permit transferred to a new owner's name remains subject to the terms and conditions that were previously in effect, it is essentially being processed pursuant to section 402(c) of FLPMA. Thus, consider regulations for automatic renewal of such permits without the need to issue a decision or create a subsequent appeal process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	12	Permitting/ Leasing Process	If a grazing allotment is maintaining proper outcomes and objectives that permit renewal should be expedited using a Categorical Exclusion (CE) instead of doing a full analysis through an Environmental Assessment (EA). Expediting permit renewal for these allotments would enable BLM to work on other important areas or projects.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Morris	Connie		MT	988	1	Permitting/ Leasing Process	I would like to see rangeland improvements of \$50,000 or less not be required to have all of the NEPA aspects apply. We had requested to be able to run a 1 1/2 " polypipe across 40 acres of BLM but the NEPA costs would have been between \$150,000-350,000 for something that wouldn't have cost near that and could easily have been removed.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ayres	Peter		IL	467	1	Permitting/ Leasing Process	I would like to say I am very concerned about adjusting public comment. Please leave public comment alone as it is. Do not weaken this process. Our voice should be included in how our Government decisions are being made. Local public comment is even more important and question and answer periods should be made available to the local public on how this Regulation is going to be addressed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baltzor	Catherine		OR	929	5	Permitting/ Leasing Process	I would also propose eliminating the protest period completely on a Cx and just have the appeal portion as the public input opportunity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chesser	Kim		NM	818	1	Permitting/ Leasing Process	I want to address the BLM about leasing BLM Grazing Permits. I have leased ranches in the years past that have BLM grazing permits. This has always posed a problem. To do it by your regulations, the permit must be changed over to my name or pay \$4.00 a head a month on top of the per head amount the rancher is wanting for his base property. In most cases, that makes the price too high for me to justify paying for the land My wife and I need to slow down some, so now I am experiencing the same dilemma. We want to let a young couple lease our ranch, but we don't want to relinquish our permit to him and he is not able to pay the extra \$4.00 a head a month, so we have a problem. The solution would be; let the permit owner continue to pay the lease and be fully responsible for the health of the land, but also be able to add the brand (of the person grazing the land) to the lease in the BLM office. This way the person would not be considered in trespass when his cattle are seen on my allotment. We have a small ranch in southeastern New Mexico (about 24 sections) and we are 34% Federal intermingled land. Not being able to lease our ranch without giving up our BLM permit is a financial burden on us. I appreciate you looking at this issue when drafting the new regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Pamela		ID	585	3	Permitting/ Leasing Process	I want more opportunities for public engagement in grazing decisionmaking — not less. I want formal, transparent processes that identify and correct overuse and trespass.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Caines	Philip	Caines Land & Livestock	WY	1496	2	Permitting/ Leasing Process	I support eliminating protest periods where permit renewals are excluded from NEPA. These steps that allow the BLM to streamline those processes and thereby spend less resources on them, allow those resources to be more productively utilized elsewhere.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baltzor	Keith		OR	933	1	Permitting/ Leasing Process	I see a need for increased grazing flexibility. Increased flexibility should pertain to timing, duration, stocking levels, targeted grazing to reduce invasive plant species, and very importantly, to reduce fine fuels to reduce fire hazard. Flexibility should ensure BLM range personnel at the local level and permittees can work together to take advantage of opportunities to optimize range health, sustainability and economic viability.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klump	Sharon		NM	1067		Permitting/ 1 Leasing Process	I can attest to the fact that improving permitting efficiency is desperately needed for BLM grazing permits. My family submitted an application for a grazing permit in 2011. As of today, March 6, 2020, we still do not have a permit. The process is too long, wasting public money in excessive administrative time, and causing loss of revenue for the federal government with lack of grazing fees. The US economy also suffers, albeit in a very small relative way with this single permit, having productive land lying unused when it could be continually creating income from a renewable source. Protests soak up a lot of money and time when oftentimes the protests are based on frivolous claims and political ideology. Some suggestions for improvement: Expansion of Categorical Exclusions Eliminate the Protest Period Issue permits without decision
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lesica	Peter		MT	509		Permitting/ 1 Leasing Process	I believe that eliminating opportunity for public protest on the management of public lands is unwarranted even though it does take time. Local BLM land managers may, in some cases, be inclined to look the other way from abuses by long-term permittees. Public input on management may, in some cases, benefit public land management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	George	Jeffrey		KS	760		Permitting/ 2 Leasing Process	I am strongly opposed to expanding the use of categorical exclusions. Fewer full and fair environmental analyses will negatively impact our ability to manage our rangelands based on scientific data. Expanding categorical exclusions will undermine public participation opportunities in the process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harvey	Bill	Baker County	OR	747		Permitting/ 4 Leasing Process	Historic areas:,use site specific, flexible evaluations to decide about the degree to which cultural surveys must be done (i.e., mined areas, homesteads; cemeteries and burial grounds, etc.)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Jon	Sagebrush Habitat Conservation Fund	ID	891		Permitting/ 6 Leasing Process	he Fund opposes creation of additional categories of actions that are not subject to further NEPA analysis, i.e., categorical exclusions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carollo	Dominic	Harney County	OR	1045		Permitting/ 1 Leasing Process	Harney County strongly supports the stated purpose of improving grazing permit administration. Revisions should be made to improve readability and understanding for the benefit of the permittees and other interested parties. Simplifying the process of grazing preference transfer will help in this effort.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carollo	Dominic	Harney County	OR	1045	3	Permitting/ Leasing Process	Harney County strongly supports streamlining and simplifying the process of how BLM issues decisions for crossing permits, and ensuring public land grazers are afforded adequate protections, so as to ensure efficient movement of cattle in order to facilitate sustainable rotational grazing practices.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	18	Permitting/ Leasing Process	Greater involvement by ranchers in decision making process will lead to better results as we will want to meet the common goals we have had a direct hand in creating. For example, working together to develop objectives that have a realistic expectation to improved rangeland conditions through grazing management will have the dedication of both the livestock producer and the agency.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	13	Permitting/ Leasing Process	Grazing Permit Renewals. Processing grazing permit renewals is too complicated, costly, and time-consuming, causing a huge backlog and straining limited budgets. The regulation must make clear in Part 4100 that a permit renewal that does not increase permitted use by more than 10% is a categorical exclusion that does not require an environmental assessment or environmental impact statement.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bulloch	Gordon	MBM Livestock	UT	752	3	Permitting/ Leasing Process	Grazing operations are not consistent for example: there are times when heavy snowfall occurs and the High Country is not ready or accessible. During situations like this it would be nice to work with the BLM to possibly allow changes and extend your Season of use more than just a few days if the forage is available on a case by case scenario, or even if it may only mean an additional 2 weeks, especially if you had not utilized all your AUM's but your season ended June 30th and needed to stay on until July 15th. A quicker more efficient process, not making it a 5 to 10 year action, to get anything done.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Watkins	Ross	Uintah County	UT	1148	1	Permitting/ Leasing Process	Grazers would like to see a faster process that helps to meet their needs. Our grazers expressed concern about waiting for years to receive permissions on their allotments. Uintah County would appreciate if the BLM would take action to expedite the permitting process in order to better serve these hard-working taxpayers who help support the BLM.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	harker	christine		MO	338	3	Permitting/ Leasing Process	Furthermore, the streamlining of the grazing access permit process will aid ranchers by impairing fair and accurate enivornmental studies being carried out.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	16	Permitting/ Leasing Process	Further, the public can offer considerable expertise on the condition of the rangeland, current land management science, and the impacts of grazing on land and resource values that can improve decision-making.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heguy	Mitch		NV	1272	1	Permitting/ Leasing Process	Flexibility within the permit is key, being bound by dates within pastures is a hindrance to effective management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carollo	Dominic	Harney County	OR	1045	5	Permitting/ Leasing Process	Finally, Harney County strongly supports the clarification and expansion of BLM's ability to employ its NEPA categorical exclusion authority.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	3	Permitting/ Leasing Process	Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chandler	Pamela		NC	1030	1	Permitting/ Leasing Process	Expediting grazing authorizations is NOT a tool to reduce wildfire or improve rangeland conditions. There is no positive correlation in the scientific literature that suggest grazing can achieve either outcome. Do not expedite these permits. -"Streamlining" protests and appeals would reduce timelines for public involvement , increase or codify exhaustion requirements and futher limit opportunities for the public to be informed and participate.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wuerthner	George		OR	830	3	Permitting/ Leasing Process	expanding the use of categorical exclusions is nothing more than another way to avoid public oversite and proper evaluation of impacts.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	France	Tom	National Wildlife Federation		1237	7	Permitting/ Leasing Process	Expanding the use of categorical exclusions - The scoping documents suggests that BLM is contemplating expanding the use of categorical exclusions (CEs).6CEs circumvent the ability for the public to effectively engage and provide comments regarding proposed changes to a grazing permit. NWF recommends that categorical exclusions should not be increased. [5 Id.; 6 Id.]
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harvey	Bill	Baker County	OR	747	3	Permitting/ Leasing Process	Expand the use of Categorical Exclusions

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Warren	Greg			1180	4	Permitting/ Leasing Process	Environmental Assessment and Environmental Impact Statement processes must continue to be followed when preparing allotment management plans and crossing permits, especially when the allotment or crossing area is located within a unit of the National Landscape Conservation System. A categorical exclusion would be inappropriate, since livestock grazing may affect the purposes for which the NLCS areas were established.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cram	Jennifer		CO	793	3	Permitting/ Leasing Process	Environmental analyses and their scope should not be decreased. This is one of the only ways that the public can see that these public lands are adequately protected (stations 2 and 3)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ghormley	Randy			1356	1	Permitting/ Leasing Process	Eliminating the protest period is not consistent with the BLMs stated objectives of improving public input opportunities. I encourage the BLM to retain the protest period for permit and release renewal decisions associated with a CE and to evaluate other means of streamlining these processes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	17	Permitting/ Leasing Process	During the period of the permit, collect key information and report it. Establish online annual allotment reports that describe the actual grazing numbers, time, and pasture use, summarizes key monitoring results, for standards not met - describe actions taken, identify challenges for the next year. This would help inform the permit holder, interested public, and set stage for renewal. Such reporting prevents surprises down the road and increases trust.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chandler	Pamela		NC	1030	2	Permitting/ Leasing Process	Do not expand the use of categorical exclusions. It would mean completing fewer full and fair environmental analysis and undermine public participation in the process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Quammen	Betsy			1358	4	Permitting/ Leasing Process	data from monitoring must remain public and we must maintain the right to comment and weigh-in on BLM EIS and EA processes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bellwood	Samantha	Nevada Department of Agriculture	NV	1009	2	Permitting/ Leasing Process	Currently fully processing permits takes between 5-7 years. In Nevada most of the grazing permits have not been renewed. The back log of permit renewals and length of time to fully process a permit renewal is affecting grazing management and resource conditions. Changes to the regulatory mechanisms to make permit renewals timely (taking 1-2 years) and to take advantage of existing coordination requirements to reduce decision issuance time are needed. The opportunity is to reduce permit renewal processing workload and time by issuing decisions immediately effective (removing the proposed decision and protest period).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beavers	Nancy		TN	201	2	Permitting/ Leasing Process	create no new categorical exclusions and expand use of EAs and EIS's; facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	23	Permitting/ Leasing Process	Create no new categorical exclusions and expand use of EAs and EISs. * Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. * * Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carney	Cheryl		TX	179	1	Permitting/ Leasing Process	Create no new categorical exclusions and expand use of EAs and EISs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sacco	Rex	Sacco Brothers Land & Livestock LLC	UT	1283	1	Permitting/ Leasing Process	Continuing the use of cooperative monitoring agreements with permittees would provide the flexibility that public land users need to increase the health and viability of the lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	19	Permitting/ Leasing Process	Conduct rangeland health assessments using a team where members that lack any conflict of interest. BLM range staff, the permit holder and interested public should be allowed to accompany the team conducting the survey but have no influence on its results.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Ruby			1176	2	Permitting/ Leasing Process	Collaborative based management should be included in permit renewals and updates with input from resource managers, agencies and permit holders.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sedman	Bruce		WY	763	2	Permitting/ Leasing Process	changes should be made to facilitate easier (generational) transition to family lease holders, as it should not require extensive legal services to do so

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	38	Permitting/ Leasing Process	Certain range improvements paid for by the applicant should be as Section 4 permits. When the costs of a project is shared between the government and an applicant, a cooperative agreement is appropriate and ownership is shared in proportion to the amounts contributed by either party.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klingel	Jon		NM	846	5	Permitting/ Leasing Process	Categorical Exclusions (CE) are rarely appropriate for grazing allotments, if ever. The negative impacts of livestock grazing in the western U.S. are everywhere and obvious.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Viandier	Jamila		CT	402	1	Permitting/ Leasing Process	BLM should not reduce any environmental analysis of lands through Categorical Exclusions, since environmental analysis is such an important tool in determining the health and viability of land. The public comment process is also of significant value and should not be sacrificed in any way to streamline the protest and appeals process in the name of permitting efficiency.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry and Diane		MT	960	6	Permitting/ Leasing Process	BLM should consider some categorical exclusions under certain conditions such as a name change on a permit. Flexibility and options allowing BLM land managers and permittees the ability to address resource concerns and changing environmental conditions can be critical for all involved. A large fire covering thousands of acres in Central MT in 2017 was a great example of this flexibility - a good growing season the next spring allowed BLM managers to work with permittees to allow some grazing of burned ground. Teamwork and use of new studies and science is crucial for all involved to make decisions without excess litigation taking time and money.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallwood	Lori	Big Horn County Commissioners	WY	1223	10	Permitting/ Leasing Process	BLM should also consider extending the permit terms from 10 to 20 years. This would allow ranchers and their families to better manage operations through generational changes in management.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fankhauser	Terry	Colorado Cattlemen's Association	CO	1108	16	Permitting/ Leasing Process	BLM should also adopt the following process to renew any grazing permit: * Such applicable monitoring data must be collected with careful quantification and application of scientific protocols. * BLM should prepare a draft allotment assessment without a pre-determined assumption that the causal factors relate to livestock grazing. * BLM should notify permittee(s) to submit a permit renewal application. While it is appreciated that the permittee(s) may not know at the time of the application as to BLM's causal factor determinations, the permittee(s) will be given an opportunity to submit the permit renewal application. * BLM should issue final rangeland determination and land use plan objectives determination, along with notice as to the permittee(s) and to the public of either of the following: o If there are no adverse determinations, and if the permittee(s) does not apply for any substantially new or different terms and conditions, BLM should provide notice to the permittee(s) and to the public that BLM will prepare a categorical exclusion, as authorized by the Federal Land Policy and Management Act, 43 U.S.C. § 1752(h), and issue a proposed decision to renew the grazing permit. o If there are adverse determinations and/or if the permittee(s) applies for a permit renewal with substantial new or different terms, BLM should provide notice to the permittee(s) and to the public that BLM will prepare a NEPA document for public comment. This notice should also ask the permittee(s) to submit any modified permit renewal application to be assessed in any NEPA document. o If adverse determinations are made and an affected permittee owns or controls private grazing resources in an amount equal to or greater than 10% of any pasture or the allotment as a whole, the permittee may request and BLM will develop an AMP or functional equivalent management plan to be analyzed in any NEPA document. * BLM should issue draft NEPA document and provide public comment. * BLM should issue final NEPA document, and issue proposed decision. * If necessary, BLM should supplement the final NEPA document, and issue a final decision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Ade	Kane County Commissioners	UT	1141	5	Permitting/ Leasing Process	BLM regulations should require BLM field offices to conduct NEPA analysis for grazing permits in a timely, efficient manner, and if necessary, prioritize grazing permit NEPA over other BLM NEPA projects. Just as the Council on Environmental Quality has recently released a proposed rule that would place hard time limits for federal agencies to complete an environmental assessment or environmental impact statement, the BLM should impose hard deadlines within which a BLM field office must complete NEPA range analysis. Deadlines of this type would give permittees more certainty and give BLM range personnel defined schedules to work with
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Govito	Destry		SC	395	1	Permitting/ Leasing Process	BLM proposes to improve “grazing permit administration” and “permitting efficiency,” increase the use of Categorical Exclusions and streamline the protest and appeals processes. This spells out reduced environmental analysis and an attempt to limit opportunities for the public to be informed about and participate in grazing management decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1274	5	Permitting/ Leasing Process	BLM needs to conduct much more detailed + thorough grazing permits must extend for 5 years.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	MacKenzie	Michelle		CA	953	2	Permitting/ Leasing Process	BLM must require the use of best available science in all livestock grazing decisions. This must include expanding the use of EAs and EISs and creating no new categorical exclusions. Likewise, BLM should allow more public engagement by allowing the public to attend field visits and letting the public know about grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry and Diane		MT	960	9	Permitting/ Leasing Process	BLM must find a way to streamline the permitting and NEPA procedures. When it sometimes takes years to get through the process, it is counter- productive for the agency, land management, and producers who are dependent on permits to continue their livelihoods. BLM lands are multi-use and the public needs to be involved, but a more stringent timeline is required for the sake of efficiency and "stable flexibility" that a dynamic environment and economy requires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	21	Permitting/ Leasing Process	BLM must ensure that proper environmental analysis is completed for all proposed livestock grazing projects that may significantly affect the human environment and that the public is informed in a timely manner and has ample opportunity to participate in planning processes that affect these public lands, waters, wildlife and climate. Part of the bargain for taking advantage of subsidized fees for grazing private livestock on public lands is that permittees must accept that BLM has an obligation to carefully consider the environmental impacts of grazing on public lands and resources, and the public has a right to full and fair participation in those decision-making processes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tomera	Paul	Tomera Ranches	NV	784	3	Permitting/ Leasing Process	Because the EA and NEPA process is so complicated, environmental groups are often able to further delay a project with a generic protest. It might not be within the scope of this process, but the EA and NEPA process, for simple range improvements, needs to be simplified. If the scope of a CX could be expanded to include most riparian exclosures, water developments, fencing projects, and other range improvements projects could be implemented sooner, thus improvements in range conditions could be realized sooner.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Swasey	Amber	Mesa County	CO	822	1	Permitting/ Leasing Process	As with most Federal review processes, the length of time required to process a new permit or a renewal from start to finish is excessive. According to the Land Health Evaluations poster provided in the Public Meeting, Station 4 Promoting Land Health folder, current permits take an average of 657 days to complete NEPA and permit issuance.1 If livestock grazing is hindered by excruciating long permit processes and regulatory red tape, the permittee's operating costs increase, and as a result, there is an increased likelihood of producers scaling back and reducing numbers. Thus, Mesa County is supportive of any process that strives to increase the efficiency of federal reviews and thereby reduces timeconsuming and often costly processes. 1 Land Health Assessments poster, https://eplanning.blm.gov/epl-frontoffice/projects/nepa/1500093/20002574/250003048/LandHealthEvaluations.pdf , (last accessed on February 21, 2020)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	2	Permitting/ Leasing Process	As part of BLM's efforts to improve its grazing administration, BLM should rewrite any necessary grazing manuals to conform with current regulations and publish them on BLM's website. In addition, BLM should make any training given to line officers regarding grazing administration available to grazing permittees to ensure that permittees are fully cognizant of the rules, regulations, guidelines and any other parameters under which they are expected to operate.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mihal	Dianne	Stone Cabin Ranch, LLC	NV	1089	5	Permitting/ Leasing Process	Another issue with "Range Improvements" is lack of accessibility. Many roads and access locations have not been maintained by the agencies due to lack of funds or lack of personelle. Permittees needs to be able to access locations with trailers for cattle needs and range improvement maintenance.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Vivian		NV	1134	3	Permitting/ Leasing Process	An EA should not be required on improvements requested, or required. They take so long to complete, that the benefit may be gone by the time it is completed. Many EAs have been completed in the past. Information should be retained instead of requiring more.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry	Williams Coulee Grazing District	MT	961	4	Permitting/ Leasing Process	Although we do not have answers on how the BLM can streamline their permitting/NEPA process, something needs fixed since the time and expense of getting through the procedure seems to have gotten completely out of hand. Changing how the BLM issues decisions on temporary permits, expanded use of categorical exclusion, and simplifying protest/appeals processes could allow time and funds for BLM staff to have boots on the ground doing proactive grazing and allotment management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Callahan	Ellen		ME	425	1	Permitting/ Leasing Process	Allow for grazing permit retirement and long-term non-use for conservation purposes.Create no new categorical exclusions and expand use of EAs and EISs.Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions.public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spotts	Richard		UT	1235	5	Permitting/ Leasing Process	Allow for grazing permit retirement and long-term non-use for conservation purposes. * Create no new categorical exclusions and require honest EAs and EISs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Erma		NY	113	1	Permitting/ Leasing Process	Allow for grazing permit retirement and long-term non-use for conservation purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lagergren	Ginna		ID	570	1	Permitting/ Leasing Process	All new proposals must include and abide by Public input for Public Lands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harvey	Bill	Baker County	OR	747	5	Permitting/ Leasing Process	Adaptive management in allotment use: -In response to seasonal variations (early spring green-up, late spring green-up, too wet to get to allotment, drought, etc.) -Allow for mid-season removal and re-entry in autumn months
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	20	Permitting/ Leasing Process	A year before permit renew, meet with interested public, the permit holder, and range staff to discuss the ecological conditions of the allotment and design a grazing system that will restore habitat, if needed, and design a monitoring program with triggers to meet ecological goals.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baltzor	Catherine		OR	929	6	Permitting/ Leasing Process	A grazing permit is renewed for 10 years, however, if it is transferred or being leased by someone other than the owner, then this lease is for three years. This means within the 10 year permit renewal, this same permit could be renewed , due to a lease, 3 times during this same time frame. I would propose the permit lease would be for the remainder of the time on the permit before it is up for renewal (which could be up to 10 years). Removing the proposed decision and protest period would expedite this process
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sammons	Chris		CO	967	1	Permitting/ Leasing Process	25 years ago, a reservoir was built near my family ranch. As part of "wildlife mitigation" we voluntarily relinquished a permit we had held for over 60 years. To date, we have been unable to navigate the process with our local office to replace that permit. Our hope is that this much needed update modernize and streamline the administration regulations, and provide greater flexibility for local management. Specifically in our case, the opportunity to increase the BLM'S flexability to applying amended management practices such as grazing rotations and emergency grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff		AZ	1458	1	Permitting/ Leasing Process	10 yr permits should be catagorically excluded from NEPA, for renewal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Ben		AZ	1481	1	Permitting/ Leasing Process	10 year permits should be categorical exclusions from NEPA, for renewal *Section 4 permits for range improvements should be reinstated as stated in section 4 TGA
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Campbell	Marcia		WY	1111	1	Permitting/ Leasing Process	[comment:1111-1; 105]As a grazing permittee I welcome the flexibility in allowing targeted grazing. We have cheat grass and the opportunity to graze it when green and palatable to the cattle is welcome.We have requested permission for fencing to improve our grazing management, and both times it took seven years to approve, once in the 1980s and once in 2010s. This needs to be streamlined.[comment end]

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marnell	Lorraine		NM	998	5	Permitting/ Leasing Process	*Public accountability. *The alternative requires public input, response to public concerns, and reporting of outcomes, all for accountability to the public about consequences of grazing
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	French	Rand		NM	1399	1	Permitting/ Leasing Process	With my past experience, I have been asked by several within the ranching community to provide comments on the livestock permitting process. It's a little late for me to get to involved in wording, but here are some thoughts. 1. The 1 - 50 Animal unit ranches (used to be called section 8 allotments) should be Categorically Excluded as long as there are no T/E issues. 2. The remaining 16,414 should be prioritized by sensitivity species, riparian habitats, fragile soils, cultural resources etc.) 3. Complete Range Health Assessments by ecological range site (the best you can lump the better) 4. Then an EA can be completed for each habitat/rangeland type. 5. Once that one EA has been approved, all associated allotments that fall within those range sites, can utilize the "DNA" (Determination NEPA Adequacy) process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	57	Permitting/ Leasing Process	We see no justification for streamlining the current protest and appeal procedures, which allow "Any applicant, permittee, lessee or other interested public" to protest proposed grazing decisions in writing or in person to the authorized within 15 days after receipt of such decision. However, due to the time required to gather information to justify a protest, we recommend that the fifteen-day period be extended to 30 days. It is critical that BLM continue to allow interested members of the public to have the same opportunities to protest and appeal that are provided to applicants, permittees and lessees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spratling	Craig	N-1 Grazing Board Nevada	NV	812	1	Permitting/ Leasing Process	We need to have more flexibility and not be locked into the same dates year after year. Whether it is wildfire fuel reduction, allowing plants to recover some years, weed prevention, year to year variation in a ranch's operation, encouraging biodiversity by allowing some plants to thrive some years and other plants to thrive other years by varying the grazing from year to year, etc. are some of the reasons that we need more flexibility in our permits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	28	Permitting/ Leasing Process	This request for flexible permitted numbers and periods of grazing has serious legal hurdles to pass over. One of the primary purposes of the Taylor Grazing Act, the Public Rangelands Improvement Act and the creation of the BLM itself, is the need for BLM to control livestock on BLM-administered lands. A method to accurately determine ownership of livestock and to have an accurate accounting of all livestock on BLM-administered lands forms the foundation on which all other aspects of the BLM's livestock permitting and management program rests. To respect the law, limits on the number and timing of grazing will still be needed in permits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Woods	James		CA	1129	2	Permitting/ Leasing Process	There is nothing about livestock grazing that comes close to qualifying for an NEPA Categorical Exclusion.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hellyer	Jim		WY	709		Permitting/ 1 Leasing Process	There is a great need to improve permit efficiency. Not only do routine transfers between parties need to be sped up, but other requests such as adjusting time of use needs to be flexible too. For example, it would be very beneficial to the range and our operation if we could utilize the aums we have in times outside of the permitted season. It is not practical to go to the local office and request use outisde of specified permit time frame because the agency could never process a request in time. Again, an example, if it's an early spring and we have the opportunity to go out early and therefore go in to the office two months early it would still take 6 months for the Agency to make a decisoin and by that time the spring is over and summer is half way gone. The solution would be to authorize range and permit wide 30-45 days of operational flexibilitiy on either end of the season so that operators simply file a notice and the agency documents the notice. Nothing more. No studies, no lenghty analysi....just a notice that the operator is exercising permit flexiblility.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reukauf	Lon	Cherry Creek Ranch	MT	1117		Permitting/ 5 Leasing Process	The use of waterbars (dirt diversions in roads to prevent water from running down them for extended distances) to prevent road and trail washouts and erosion should be able to be done without NEPA or EIS. A procedure should be developed that allows permittees to install water bars at no cost to the BLM. Each waterbar could be GPS noted with a minimum of paper work and expense. The public use of these roads, especially during a wet hunting season, takes a hard toll on road conditions. If the deep ruts and road damage is not addressed intelligently then very quickly erosion ruins roads and trails turning them into deep ditches. Existing road repair is not allowed without difficult to receive permitting.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlisle	Celeste	Return to Freedom Wild Horse Conservation	CA	1016		Permitting/ 3 Leasing Process	The scoping document mentions looking for ways to involve the public, but not cause undue burden on government employees. Understandable, but this requires very thoughtful consideration. The public IS involved in public lands use issues. The EA should include redirection of the public involvement process towards healthier, more meaningful discourse and exchange of ideas and expertise throughout the process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davies	Mary		OR	833		Permitting/ 1 Leasing Process	The permit transfer should only be processed every 10 yrs.. There is no need for a 3 year when it had been in good standing with only a name change involved.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dufurrena	Timothy		NV	1094		Permitting/ 1 Leasing Process	The permit process is extremely lengthy and stultified. Changes to a grazing permit are currently only possible as part of the renewal process. It would be efficacious to allow the permittee and ssociated AO to respond to landscape level changes due to drought, fire etc in the calendar year or soon after without a full-blown EA.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892		Permitting/ 1 Leasing Process	The NEPA process has become a tremendous burden on many ranchers and the BLM. Many UCCA members have issues getting projects approved in a timely manner. Projects such as fencing, water, and vegetation projects are taking years to make it through the NEPA process. The ranchers propose these projects to improve range conditions not only for their livestock but for wildlife and water shed management as well. The delay of these projects through the NEPA process causes ranchers and the BLM to have less managing options in their grazing plans. Possible solutions could be to reduce the type of projects that require a full NEPA process. For example, if a rancher request to install a 2" underground waterline to improve water availability and grazing distribution this should not require a full NEPA, but rather a simple archaeological and right-of - way clearance.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoffman	Ted		ID	1019		Permitting/ 1 Leasing Process	The grazing regulations should provide for timely changes, that is, changes in the current grazing season for the amount and the timing of grazing use in response to moisture conditions, forage production, weed production, and fuel production for wildfire occurrence.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lyons	Scott	Box Elder County Commission		1140		Permitting/ 9 Leasing Process	The BLM's grazing regulations should be updated to better accommodate rotational grazing (also known as deferred grazing, rest-rotation grazing, and other terms). Rotational grazing significantly benefits rangeland health livestock, and has successfully been implemented on a large scale at several sites in Utah. Projects such as the Three Creeks Grazing Improvement Project in Utah's Rich County can be designed to enhance forage for livestock, improve wildlife habitat, and protect water quality. Rotational grazing is also an effective way to maintain existing levels of AUMs in situations where rangeland health deteriorates due to drought, over-use by wild ungulates, or other conditions. Unfortunately, existing BLM regulations are not conducive to implementing rotational grazing systems on BLM allotments, and the NEPA analysis for such projects can take many years. (The Three Creeks Project in Utah is one such example, which took over seven years to complete.) Out-of-date regulations have made rotational grazing projects a particular target of litigious organizations which oppose rotational grazing and seek to delay projects indefinitely. Updated BLM regulations should help BLM range personnel perform timely NEPA analysis for rotational grazing projects, as well as related administrative tasks such as consolidating grazing allotments. Rangeland health across BLM lands in the western United States will improve if the BLM facilitates rotational grazing and works cooperatively with interested permittees so make such systems a reality.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lyons	Scott	Box Elder County Commission		1140	4	Permitting/ Leasing Process	The BLM should ensure the process of completing NEPA analysis for grazing permits is timely and efficient. NEPA analysis for permit renewal in Utah often takes far too long, and can even take years. These delays cause uncertainty for livestock permittees that make it extremely difficult to plan ahead or invest in a livestock ranching business. BLM regulations should require BLM field offices to conduct NEPA analysis for grazing permits in a timely, efficient manner, and if necessary to prioritize grazing permit NEPA over other BLM NEPA projects. Just as the Council on Environmental Quality has recently released a proposed rule that would place hard time limits for federal agencies to complete an environmental assessment or environmental impact statement, the BLM should impose hard deadlines within which a BLM field office must complete NEPA range analysis. Deadlines of this type would give permittees more certainty and give BLM range personnel defined schedules to work with. Livestock grazing will better function as a useful management tool if NEPA analysis happens promptly and efficiently.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	27	Permitting/ Leasing Process	The BLM should be seeking more public input and Indigenous input in order to properly and accurately tell these stories, and grazing permit renewals should necessarily entail in-depth analyses of the history of the places and peoples affected by continued livestock use.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cunningham	Sean		OR	1231	6	Permitting/ Leasing Process	The BLM should allow the Authorized Officer to use adaptive management of the grazing permits. Given the changing climate and economic conditions is it important for grazing permittees to be able to change the seasons of use and numbers of cattle or type and kind of livestock (Yearlings, sheep, goats) to address current issues. As long as the proposed changes are beneficial or neutral to the health of the land, the operator should be giving the flexibility of adaptive management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	581	10	Permitting/ Leasing Process	The BLM must not expedite grazing permitting unless and until a scientifically-based evaluation is conducted of the proposed allotment permitted for grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rosquist	Amy	Six County Association of Governments	UT	1170	8	Permitting/ Leasing Process	The BLM currently has the ability under a Categorical Exclusion to renew grazing permits with existing terms and conditions. This is an efficient process that benefits permittees, and makes smart use of BLM resources. This Categorical Exclusion should be extended to all permit renewals, even when terms and conditions change. Thousands of permits have now been analyzed with Environmental Assessments (EA) that resulted in a Finding of No Significant Impact (FONSI). Renewals with terms and conditions that are substantially similar to EA' s that were previously completed should be Categorically Excluded and not require an additional NEPA analysis. Ultimately this will allow both permittees and BLM personnel to spend less time on paperwork and more time working on the range, taking care of livestock and managing the land. In situations where there are previously identified issues that result in the need for additional analysis, that analysis could occur prior to future permit renewals on those specific allotment. But overall policy should be that permit renewal is categorically excluded from the NEPA process, even under new terms and conditions. The BLM should utilize existing EA whenever possible and avoid duplication of previous paperwork and analysis.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlisle	Celeste	Return to Freedom Wild Horse Conservation	CA	1016	2	Permitting/ Leasing Process	Sweeping categorical exclusions for some types of grazing activities, even grazing which may seem to have very little to no environmental impact, are inappropriate. NEPA was established to protect our public lands in general, and though bureaucratic and tedious, assessing the impact of a use – be it a grazing cow, siting for a new mine, or determining carrying capacity for wildlife – is the very point of NEPA. The EA should not analyze CEs for any sort or type of grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	alexandra	Kathryn		WA	654	2	Permitting/ Leasing Process	Streamlining protests and appeals – This is likely a reference to a desire by the agencies to reduce timelines for public involvement, increase or codify exhaustion requirements, and to further limit opportunities for the public to be informed about and participate in .
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ranch	LeValley		CO	1084	2	Permitting/ Leasing Process	Specific to permit renewal, the regualtion should make clear that a permit renewal that does not increase permitted use by more than 10% should be processed under a categorical exclusion. This type of renewal is routine and does not require additional NEPA review. This includes range improvements.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Simkins	Connie	N-4 State Grazing Board	NV	1410	8	Permitting/ Leasing Process	Since the Babbitt Range Reform initiative went into effect, we have also noted a near abandonment of Allotment Management Plan (AMP) development throughout the BLM administered land areas. Instead, the agency issues a permit with specific conditions (permitted AUMs, on and off dates, etc.) and an Environmental Assessment (EA) for public review and comment. This approach is not a plan brought about by BLM and permittee cooperative planning, but rather a dictate of updated permit conditions with AUM numbers and dates. BLM needs to prioritize AMPs as the most important land use activity plan when addressing livestock grazing. When an AMP is developed cooperatively with the permittee and approved, it becomes the roadmap for management over the next 10 years, while outlining the planned management and improvements to be installed over that period. The AMP also outlines the resource objectives, monitoring process and records the results yearly while laying out what changes the BLM and operator may agree to for the next grazing season. The AMP is the first place a new Range Conservationist should go to determine where things are with a specific allotment and it allows for an easy transition to continue forward in managing the allotment.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoffman	Ted		ID	1021	2	Permitting/ Leasing Process	Providing interested public status to anyone and everyone has only increased the cost and time of decision-making without improving the quality of the process. Interested public should be defined as individuals who have requested that status with regard to a specific allotment and only when they have provided comments on that specific allotment during a public comment process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jacobson	Susan		CO	631	2	Permitting/ Leasing Process	Provide a means to retire grazing permits from the system.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keeler	Murray & Judy		NM	1018		7 Permitting/ Leasing Process	Permitting Deficiencies and Efficiency Suggestions As a federal regulatory agency, the BLM should be held to the highest standards. We concur that Current Billing; Permit and Lease Renewals/Transfers need to be streamlined. We also concur it takes too long for the BLM to process a permit. We will leave streamlining the NEPA regulations and the permitting process to the experts in both these fields. These are the recommendations we offer for improved permitting efficiency: * Presently rangeland monitoring is inconsistent. Variable methods used to gather data and analysis of the data does not allow for reliable trends to be documented. * Rangeland Health cannot be determined over a short period of time. Grazing trends need to be determined before specific changes are made to the management of a grazing allotment. * Some of the current monitoring methods used by the BLM are not scientifically based. This allows opinions to set the standard for the preferred management strategy. * Rangeland health assessments in the West can be positively or negatively influenced by multiple short-term factors including rainfall amounts, heat indexes, seasons, wildlife and the timing of monitoring. These factors must be considered when evaluating a grazing allotment. * The ever-changing BLM rules and regulations cause uncertainty in the ranching community. * Reductions in authorized livestock grazing, without scientific data, can have an adverse economic impact on ranching families. * Reductions in authorized livestock grazing also has an adverse economic and social impact on the small, rural communities that are surrounded by these grazing allotments. * Objectives of livestock grazing should be measurable and include consultation, cooperation and coordination at a local level. * If the objectives are measurable and duplicatable, it will help stabilize ranching families and the livestock industry in New Mexico. * Grazing decisions by the authorized officer should be scientifically valid and defensible. The need for scientific data to accomplish a goal should become the standard for future management decisions. * The perception of the public that livestock grazing still contributes to the decline of the western rangelands needs to be addressed by the BLM. * Allotment owners need more flexibility to accomplish management objectives. Outcome Based Grazing appears to offer the flexibility a grazing allotment owner needs to improve the allotment. * Restore New Mexico should be used as an example of what can be accomplished when the allotment owner sets the goals and the federal agencies provide the technical support and share the financial costs to accomplish the goals through cooperation and coordination. * Range Improvement Funds should be returned to be used as they were intended; to improve the rangelands, not cover administrative costs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bowers	James	Horseshoe I Ranch	MT	1403		1 Permitting/ Leasing Process	Permit + Lease Renewals: Streamline renewals excluded from NEPA. PErmit + Lease Transfers: Issue permits + leases without decision when only a name change is involved. Also a 10 year minimum term on the permit would be beneficial.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Maryboy	Kenneth	San Juan County Commission	UT	1427		3 Permitting/ Leasing Process	One potential change would be to eliminate the Proposed DecisionIProtest period in certain grazing permit renewals which qualify as categorical exclusions under the National Environmental Policy Act. A Proposed Decision appears to be an unnecessary step for an action that can be categorically excluded (actions with little or no controversy or effect on the environment and no appreciable change from the previous authorization). Elimination of the Proposed DecisionIProtest period in these instances would shorten the renewal process by at least IS days and even more if a protest is filed and must be considered prior to issuance of a Final Decision.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bowers	James	Horseshoe I Ranch	MT	1403	3	Permitting/ Leasing Process	Non Renewable Permits + Leases: Eliminate Proposed Decision and Protest Period to facilitate timely implementation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ackerman	Laura		WA	508	3	Permitting/ Leasing Process	Muchmore public involvement! It's not just grazers who own the land
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	alexandra	Kathryn		WA	654	4	Permitting/ Leasing Process	Expanding the use of categorical exclusions – i.e. completing fewer full and fair environmental analyses – and undermining public participation opportunities in the process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	56	Permitting/ Leasing Process	Expanding or clarifying the use of categorical exclusions to "improve permitting efficiency" is unwarranted and out of the scope of the notice of intent which states an intention to modify only the grazing regulations at 43 CFR part 4100.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	1	Permitting/ Leasing Process	Each grazing permit should allow for maximum flexibility and adaptive measures during seasons of use. Decisions should be based on current weather, climate and forage conditions. Seasons of use for each allotment should not be rigid or absolute in order to manage the forage resource more effectively to meet forage standards. Permits should allow for the flexibility of livestock numbers within an allotment to allow for short duration, high density grazing to control annuals and allow for longer seasons of rest. The same would apply for longer seasons of use during forage dormancy
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoots	Dan L.	Bureau of Land Management, Egan Field Office	NV	1433	1	Permitting/ Leasing Process	Dramatically Improve Distribution of Livestock 1) Drift Fencing to prevent stockpiling of Livestock 2) Water Development a) Drill wells b) Develop Springs; piping and troughs c) Pipe waters to dry areas 3) Allotment Fencing and cross fencing with rotation allowed to prevent spot overuse and grazing rotation too improve livestock use of feed. 4) Rest and rotation pasture allotments 5) Reseeding of burned areas into crested wheat pasture. This would prevent future fires with improved grasses. Ie. not allowing cheat grass infestations and not planting high fuel brush- waiting for lightning strikes or motor vehicle sparks. Consultation on between Permittees and BLM Managers Rangeland Specialists is extremely Valuable.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Glebs	JOHN		MO	448	2	Permitting/ Leasing Process	Create no new categorical exclusions and expand use of EAs and EISs. Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions. Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Erma		NY	113	2	Permitting/ Leasing Process	Create no new categorical exclusions and expand use of EAs and EISs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mayer	Christopher		NV	824	2	Permitting/ Leasing Process	<p>Comment 2 This comment is in reference to NEPA categorical exclusion authorities, specifically referencing the handbook section as follows below relative to “Issuance of livestock grazing permits/leases where: ”. a. The new grazing permit/lease is consistent with the use specified on the previous permit/lease, such that (i) the same kind of livestock is grazed, (ii) the active use previously authorized is not exceeded, and (iii) grazing does not occur more than 14 days earlier or later than as specified on the previous permit/lease, and b. The grazing allotment(s) has been assessed and evaluated and the Responsible Official has documented in a determination that the allotment(s) is (i) meeting land health standards, or (ii) not meeting land health standards due to factors that do not include existing livestock grazing. The same or similar rationale applies here as above. If the terms and conditions would not change this should not be a designated CX. The grazing permit that would be issued to the new transferee would have already if fully processed and renewed been sent to the public for ccc for the proposed (protest and if needed the final decision Public and permittees already have had an opportunity to CCC therefore this requirement for a CX and decision should be eliminated. This is an action designated as a CX as referenced here: Appendix 4 - 151 H-1790-1 - NATIONAL ENVIRONMENTAL POLICY ACT HANDBOOK – (Public) BLM MANUAL Rel. 1-1710 Supersedes Rel. 1-1547 01/30/2008 11. Issuance of livestock grazing permits/leases where: a. The new grazing permit/lease is consistent with the use specified on the previous permit/lease, such that (i) the same kind of livestock is grazed, (ii) the active use previously authorized is not exceeded, and (iii) grazing does not occur more than 14 days earlier or later than as specified on the previous permit/lease, and b. The grazing allotment(s) has been assessed and evaluated and the Responsible Official has documented in a determination that the allotment(s) is (i) meeting land health standards, or (ii) not meeting land health standards due to factors that do not include existing livestock grazing.</p>
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cunningham	Sean		OR	1231	4	Permitting/ Leasing Process	BLM's process to renew grazing permits is too complicated, costly, and time-consuming, as evidenced by the significant backlog and strained budgetsAllotments that are determined from quantitative monitoring to have land health in a positive or stable trend should have their grazing permits renewed under a categorical exclusion under the NEPA as authorized under Section 3023 of Public Law 113-291. The regulation must make clear in Part 4100 that a permit renewal that does not increase permitted use by more than 10% should be processed under a categorical exclusion. This type of renewal is routine, does not contain significant changes, and therefore does not require an environmental assessment or environmental impact statement. Furthermore, once an allotment management plan is approved, range improvements undertaken as part of implementing that plan are not new decisions subject to administrative appeals or further NEPA analysis.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Miller	Charles		MT	40	1	Permitting/ Leasing Process	BLM may consider the use of Catagorical Exclusion and Findings of No Significant Impact to speed these Range land improvements and diversify grazing impacts, This woul apply specifically for fresh water ground water wells powered by wind, conventional electricity, or solar power.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reukauf	Lon	Cherry Creek Ranch	MT	1117	1	Permitting/ Leasing Process	As a rancher with 4 different BLM allotments I have volunteered to do improvements to facilitate more ecologically beneficial grazing of both livestock and wildlife. These improvements have consisted of cross-fencing, additional water pipelines and wells also erosion control on roads and trails. I have willingly supplied both materials and labor because I feel I have a good financial deal by being able to lease these lands. The problem has been that even with me supplying all the materials, labor, and machine work; the BLM paper work that is needed for the beginning of a project takes as long as 4 years. A lot of this excessively long wait is caused by overuse of NEPA and Environmental Impact Statements. Streamlining and Simplifying this process would help land managers greatly in their efforts to do a better job of managing BLM Lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schenk	Sherry		CO	1406	2	Permitting/ Leasing Process	Another issue is the limitation the proposed regulations make on public input. Decreasing or stopping public input means that locals who are most often on grazed allotted lands will not be able to have input into future decisions about garzing management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dieterich	Michele		MT	235	3	Permitting/ Leasing Process	Allow for more public engagement including making monitoring reports available for public perusal. Notify the public of grazing permit decisions and invite them for site visits
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Franko	Rich		MT	1422	2	Permitting/ Leasing Process	Allotment grazing permits should be for 30 years instead of for 10 years.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon		NM	1402	34	Permitting/ Leasing Process	Affected Interest. Limited to individuals or organizations that have an active resource interest in a specific grazing allotment, such as: permittee, landowner, state land trust officer, state game and fish, grazing advisory board whom have been approved by the BLM Authorized Officer. Background: Concern that outside groups with "no skin in the game" have too much involvement in individual grazing allotments. The grazing allotment is a financial investment and maybe the only source of income for a family and should not have to operate at the mercy of a grandmother in Florida who have limited knowledge of western conditions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Shephard	Ed	Public Lands Foundation		1128	4	Permitting/ Leasing Process	Administrative-permit processing It takes 7-10 years for BLM to process a grazing permit which is entirely too long. Regulations should propose ways to shorten approval time. In addition, recent changes in FLPMA, NEPA, ESA, and the Clean Water Act since 2006 e.g., setting priorities for processing permits, identifying which permits can be renewed using categorical exclusions should be covered. In addition, is there a need for a decision for every permit issued?
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Findling	Karl		OR	1135	5	Permitting/ Leasing Process	5. Expanding the use of categorical exclusions - The BLM shouldn't complete fewer full and fair environmental analyses - and undermine the public participation opportunities in the process. BLM Should: 1. Create no new categorical exclusions and expand use of EAs and EISs. 2. Other causal factors in reductions and degradation to wildlife habitat need to be addressed as well, such as Wildhorse management, threats from human-caused disturbances, renewable energy siting, and wildfire. 3. The ongoing need for BLM to address the numerous, outstanding allotments not meeting the "Standards for Rangeland Health," and promptly completing the evaluations on all remaining allotments. Grazing is allowed on a large majority of BLM lands, and with no measurable improvements over the last two decades, the status quo, nor a backslide will should not be an outcome that is desired.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Depoali	Ed			1420	6	Permitting/ Leasing Process	4. Grazing permit renewals. A perfect example of the carryover gridlock from rangeland reform. Way too much time and money is spent on this and other non-crisis issues. Now, it may be less time consuming for the atomic energy commission to get approval for a nuclear test than to renew a grazing permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Winkler	Rich	Malpai Borderlands Group		1232	2	Permitting/ Leasing Process	3. Make maximum use of categorical exclusions and other shortcuts in the laws.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	907	3	Permitting/ Leasing Process	· Livestock grazing on BLM lands is permitted, whereas many of the other multiple-uses are not, therefore ranchers need to be meaningfully included in the BLM decision making process because our families are the ones directly affected by those decisions. · Greater involvement by ranchers in decision making process will lead to better results as we will want to meet the common goals we have had a direct hand in creating. For example, working together to develop objectives that have a realistic expectation to improved rangeland conditions through grazing management will have the dedication of both the livestock producer and the agency.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baltzor	Catherine		OR	929	4	Permitting/ Leasing Process	When a permit changes ownership and the only thing different on the permit, is the name, a Cx would streamline this process. I also think in this instance, since it is not a renewal it should be issued without a decision

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Echevarria	Marty		NV	838	1	Permitting/ Leasing Process	We urge you use flexibility and adaptive management focusing on outcome based grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cockrell	Will & Debra		CA	1017	2	Permitting/ Leasing Process	-We support the principle of changing whatever necessary regulations that are needed to be corrected to provide for any livestock grazing permit that is being renewed and does not increase the preference by more than 10 percent that a categorical exclusion be provided which does not require an Environmental Assessment (EA) or and EIS. Likewise, once an allotment management plan has been approved, range improvements necessary to be used in implementing that plan within the scope of the plan are not new decisions to be dealt with through administrative appeals or National Environmental Policy Act analysis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rodriguez	Shamaria	Rhoads Ranch	NV	1251	2	Permitting/ Leasing Process	We realize & agree range needs to be rested after a fire. However, a wet year often follows a fire a year or two later & feed comes back abundantly. On years like that it would help the range and us if we could graze it when its appropriate. It would reduce the fuel load & the chance of reburning. Being more flexible in managing after a fire would be beneficial for all.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Rankin		NM	1179	3	Permitting/ Leasing Process	We live in an area dominated by oil extraction. When an oil well location is permitted, we are not consulted on whether or not such location is removing an essential part of our grasslands and we receive no monetary compensation, even though we are the surface owners and the ones who are most affected. We lose vital forage for livestock and wildlife alike. Allotment owners must be included in the decision making process when related to grazing on their allotments and including, but not limited to, exchanges-of-use carrying capacity, crossing permits, designated recreation areas, mining, and mineral extraction. Current regulations disregard meaningful consultation, cooperation, and coordination with allotment owners and lessees. The land is not owned by the "public", but is held in trust and managed for multiple uses on behalf of the public. That is why an allotment is known as a split estate. The public in general is not affected and we can attest with pictures of misuse that they do not care how they treat the land, and do not have a vested interest, nor do they have right, or title, as defined by the Taylor Grazing Act. The "interested public" should be removed from the equation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1230	2	Permitting/ Leasing Process	We are very concerned that claimed efficiency measures will be used to short-cut detailed hard look analysis based upon comprehensive baseline data
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dietz	Victoria	Washakie County Conservation District	WY	1000	7	Permitting/ Leasing Process	WCCD recognizes the necessity of change for improving the permitting efficiency and the permitting process. A more efficient and consistent permit renewal process is needed that is less burdensome on BLM and provides assurances to the permittees' that have well-managed allotments.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mackay Dean	Shelley		MT	1380	4	Permitting/ Leasing Process	Water is critical for livestock and wildlife health. It is imperative that permittees be able to develop and maintain water sources and pipelines using equipment without having to jump through years of bureacratic hoops.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Crowder	Jessica	Western Landowners Alliance	WY	1082	6	Permitting/ Leasing Process	Transfers of grazing preference, when the only change is the name (one livestock operator to another) on the permit or lease, BLM should not require the same level of analysis as a change in management or use. These decisions should also not require a protest period prior to issuance of a final decision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Simkins	Connie	N-4 State Grazing Board	NV	1410	11	Permitting/ Leasing Process	Training and Mentoring of BLM Range Specialists The N-4 Board has recognized a significant failing of the BLM to carry out the necessary introductory training of young, beginning Range Conservationist both in classroom, and the subsequent mentoring by experienced senior-level Rangeland Specialists in the field. In addition, permittees are experiencing continual movement of these specialists whereby they rarely are in place long enough to become fully acquainted with the allotment permits or the permittees they are responsible for. The N-4 Board strongly recommends retaining Range Conservationists at the location until they are adequately trained and able to function as such. Range Specialists should not be required to move for a promotion but rather promote in place if they are satisfied with their location and effectively handling their work assignments. The N-4 State Grazing Board is aware that the livestock industry has provided detailed comment and recommendations with respect to the existing grazing regulations and stand fully in support of those suggestions. The above comments are meant to supplement and or expand on a number of those Industry comments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hall	D. Shane	Crawford Cattle LLC	NV	615	1	Permitting/ Leasing Process	-Timing and Season of Use Flexibility -Rangeland science is nearly united in declaring that having livestock graze the same pasture, at the same time every year is not conducive to land health. The alternative would to be able to graze pasture A this Spring, rest it next Spring but graze it next Fall. However, with the stringent requirements at this time this is not possible as so many EIS's would need to be performed with each possible grazing scenario. The inflexibility is hindering range health
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cockrell	Will & Debra		CA	1017	9	Permitting/ Leasing Process	-There needs to be some kind of protection for the permittee's side if a WSA designated area is turned into a Wilderness Area. Without having to go through hours and meetings of working out a plan with the Friends of the Wilderness. The Permittee's Need Protection too!!
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cockrell	Will & Debra		CA	1017	7	Permitting/ Leasing Process	-There needs to be more flexibility built into grazing permits to allow for adjustments to be in the management practices as issues and concerns arise

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Prunty Rianda	Kyla		NV	902	4	Permitting/ Leasing Process	There needs to be greater flexibility in season of use and AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hyatt	Jim		NM	1023	1	Permitting/ Leasing Process	There needs to be a more streamlined, simplified approach within the BLM District office and its different departments to get projects approved in a timely manner for permittees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	3	Permitting/ Leasing Process	The requirement for crossing authorizations being the same process as a typical 10 year grazing permit or lease may be detrimental to permittees/lessees and grazing efficiency. When it is time to move livestock, the permittee/lessee does not have years to wait for permission from an overloaded bureaucracy. Even though crossing authorizations are subject to categorical exclusions, they are still required to produce a Proposal Decision and provide a Protest Period. Workload and time will be greatly reduced should an issuing decision be effective immediately by eliminating the Protest Period.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	12	Permitting/ Leasing Process	The regulations should require, in coordination with ranchers, management decisions are based upon the best rangeland science, that flexibility is built into grazing permits to allow for adaptive management as issues and concerns arise, and that that quality and quantity of data collected can support all decisions made.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	3	Permitting/ Leasing Process	The regulations should make allowances to ensure vacant allotments are made available for grazing when wildfire, or some other issues outside the control of the permittee prohibits the use of their normal allotment. This process should not require individual NEPA analysis since each vacant allotment would have previously had a NEPA analysis and it should allow the authorizing officer to make quick decisions using a Categorical Exclusion (CAT EX) or Determination of NEPA Adequacy (DNA) without delaying the timely use of the alternative forage when needed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Peila	Lori		OR	947	1	Permitting/ Leasing Process	The purpose of the short term grazing options are to provide the operator and BLM representatives the opportunity to address resource concerns in a timely manner. The Non Renewable Permits and Leases, Permit and Lease Flexibility, Crossing Authorization, and Targeted Grazing are all areas where there is a need for our BLM employees to have the flexibility to address the permitted resource. The above options need to have date and season flexibility added to them. This would allow them to enhance the resource by targeting the annual grasses and utilize grazing as a wildfire prevention tool. Allowing this type of management to be carried out under a Categorical Exclusion (CX) and would avoid the lengthy paperwork and comment periods, which sometimes cause the agency to lose the window of opportunity for implementation.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cornez	Sandi		OR	531	2	Permitting/ Leasing Process	The public neds to be informed and participate in any grzing management decisions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Martinez	John		CA	556	1	Permitting/ Leasing Process	The public deserves more, not less, of a say in grazing decisions on public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rhoads	Dean	Rhoads Ranch		1165	3	Permitting/ Leasing Process	The process needs to be streamlined and improved. An example of this cumbersome process is a new fence between a neighboring ranch and ours that would have better distributed the cattle and feed for both ranches. We were told this would take a minimum of 5 years-probably longer- and cost at least \$50,000. Needless to say, this improvement will not happen.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frandsen	Fred	Washakie County Commissioners	WY	1246	7	Permitting/ Leasing Process	The process for renewing a grazing permit is complicated, inefficient, and expensive for the agency and permittees. Any options to streamline the permit process to reduce the time and resources required for renewals should be considered. Any improvements would not only save the BLM expenses and resources but also allow the permittees to better manage their allotments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallwood	Lori	Big Horn County Commissioners	WY	1223	9	Permitting/ Leasing Process	The process for renewing a grazing permit is complicated, inefficient and expensive for the agency and permittees. BLM should consider streamlining the process to reduce the time and resources permit application and renewal requires and to address the existing permit renewal backlog. For example, consider categorically excluding permit renewals which do not increase or decrease permitted grazing use by more than ten percent.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Meyer	Cathy	Lower Wind River Conservation District	WY	1384	3	Permitting/ Leasing Process	The LWRCD supports all users of the land be required to have a permit. This would not only include energy and livestock grazing, but also hunters, hikers, campers, bird watchers, horseback riders (for pleasure) and ATV riders. With that would be an educational program to teach all to respect others using the land-i.e. leave gates as you found them; take your trash with you; put out camp fires; allow others their space; shoot only what you have a permit for (not signs, water troughs, windmills, etc); keep pets from chasing wild life; don't travel alone or on dirt roads in bad weather.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	23	Permitting/ Leasing Process	The grazing permit renewal process has proven to be inefficient and has not allowed adequate and effective opportunity under the Federal Land Policy and Management Act, 43 U.S.C. § 1752(h), to focus on the NEPA process. We have included an attachment to these comments which outlines recommendations to improve this process and to achieve grazing permit decisions that have benefitted from ample public review and permittee involvement.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bushman	Darin	Piute County	UT	1263		Permitting/ 8 Leasing Process	The BLM's grazing regulations should be updated to better accommodate rotational grazing (also known as deferred grazing, rest-rotation grazing, and other terms). Rotational grazing significantly benefits rangeland health livestock, and has successfully been implemented on a large scale at several sites in Utah. Projects such as the Three Creeks Grazing Improvement Project in Utah's Rich County can be designed to enhance forage for livestock, improve wildlife habitat, and protect water quality. Rotational grazing is also an effective way to maintain existing levels of animal unit months ("AUMs") in situations where rangeland health deteriorates due to drought, overuse by wild ungulates, or other conditions. Unfortunately, existing BLM regulations are not conducive to implementing rotational grazing systems on BLM allotments, and the NEPA analysis for such projects can take many years. (The Three Creeks Project in Utah is one such example, which took over seven years to complete.) Out-of-date regulations have made rotational grazing projects a particular target of litigious organizations which oppose rotational grazing and seek to delay projects indefinitely. Updated BLM regulations should help BLM range personnel perform timely NEPA analysis for rotational grazing projects, as well as related administrative tasks such as consolidating grazing allotments. Rangeland health across BLM lands in the western United States will improve if the BLM facilitates rotational grazing and works cooperatively with interested permittees so make such systems a reality.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wardlaw	Tricia		OR	976		Permitting/ 3 Leasing Process	The BLM's streamlined protests and appeal process will reduce timelines for public involvement, increase or codify exhaustion requirements, and further limit public involvement in decisions regarding livestock grazing on public lands and within Wilderness, so I'm opposed to this revision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ocean	David		CA	973		Permitting/ 5 Leasing Process	The BLM should not streamline the protests and appeal process. This will reduce timelines for public involvement, increase or codify exhaustion requirements, and further limit public involvement in decisions regarding livestock grazing on public lands and within Wilderness, so I'm opposed to this revision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966		Permitting/ 6 Leasing Process	The BLM should not create any new categorical exclusions for EAs and EISs, but the BLM should assess if the categorical exclusions still apply. Any decisions that fall under a categorical exclusion need to maintain the protest period as to allow for public input. The current length of protest periods should be maintained and not shortened. This will allow enough time for protest preparation and anything less would risk inadequate detail for decision process. It is critical to continue to allow for public input before final decisions are made.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310		Permitting/ 24 Leasing Process	The BLM should modernize the current interested persons notice requirements The current BLM grazing regulations contained archaic and outdated notice requirements for notifying and working with the interested public. For example, the BLM is required to send certified mail to all interested publics when working on terms andconditions in a permit. Also, the BLM could modernize how notices would be sent by using websites and email, in-lieu of utilizing certified mail

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bushman	Darin	Piute County	UT	1263	3	Permitting/ Leasing Process	The BLM should ensure the process of completing NEPA analysis for grazing permits is timely and efficient. NEPA analysis for permit renewal in Utah often takes far too long, and can even take years. These delays cause uncertainty for livestock permittees that make it extremely difficult to plan ahead or invest in a livestock ranching business. BLM regulations should require BLM field offices to conduct NEPA analysis for grazing permits in a timely, efficient manner, and if necessary to prioritize grazing permit NEPA over other BLM NEPA projects. Just as the Council on Environmental Quality has recently released a proposed rule that would place hard time limits for federal agencies to complete an environmental assessment or environmental impact statement, the BLM should impose hard deadlines within which a BLM field office must complete NEPA range analysis. Deadlines of this type would give permittees more certainty and give BLM range personnel defined schedules to work with. Livestock grazing will better function as a useful management tool if NEPA analysis happens promptly and efficiently.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Florence	Lenn	Florence Family Farm		1278	2	Permitting/ Leasing Process	The BLM should empower its range personnel to make rapid, science-based decisions to authorize early on dates or late off dates, as conditions allow. The NEPA analysis for a BLMtrailing permits should consider the environmental impact of early on dates and late off dates during favorable years, so that no additional NEPA analysis would be necessary to authorize such flexibility when favorable conditions occur.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Singleton	Annette	Summit		1305	7	Permitting/ Leasing Process	The BLM currently has the ability under a Categorical Exclusion to renew grazing permits with existing terms and conditions. This is an efficient process that benefits permittees and makes smart use of BLM resources. This Categorical Exclusion should be extended to all permit renewals, even when terms and conditions change. Thousands of permits have now been analyzed with Environmental Assessments (EA) that resulted in a Finding of No Significant Impact (FONSI). Renewals with terms and conditions that are substantially similar to EA's that were previously completed should be Categorically Excluded and not require an additional NEPA analysis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Pauline	Otero County Cattleman's Association		1201	16	Permitting/ Leasing Process	The 3 year minimum on permit/lease transfers should be extended up to 10 years. This would eliminate duplication of paperwork, workload, and time. The requirement for crossing authorizations being the same process as a typical 10 year grazing permit or lease may be detrimental to permittees/lessees. When it is time to move livestock, the permittee/lessee does not have years to wait for permission. Even though crossing authorizations are subject to categorical exclusions, they are still required to produce a Proposal Decision and provide a Protest Period. Workload and time will be greatly reduced should an issuing decision be effective immediately by eliminating the Protest Period.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010		Permitting/ 2 Leasing Process	Streamlining these important processes through the creation of new categorical exclusions, and subsequently reducing the number of activities subject to NEPA review, would undermine the ability of BLM and this country's citizens to assess the environmental impact of the agency's decisions. Environmental Impact Statements (EIS) and other interim "checks" on the rulemaking process are essential to informing both the agencies and the public of impacts to natural resources and the environment. The argument that NEPA review should be curtailed because it utilizes agency resources is contrary to the intent of NEPA, and indeed the spirit of natural resource management in the United States. NEPA requirements are essential to ensuring that agencies are carefully considering the environmental impacts of their actions. These critical assessments require the agency to consider not only the immediate impacts of their actions on the human environment, but also the effects of these actions in combination with other impacts to the resource at issue. These assessments help catch problematic aspects of a proposed action early on and encourage the agency to make needed adjustments. Doing so promotes environmental, social, and economic sustainability while also maintaining public trust. It is essential that BLM,continue to perform a careful review of the environmental impacts of its actions, and not expand the use of categorical exclusions beyond that intended by Congress.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Atkinson	Susan		CO	633		Permitting/ 3 Leasing Process	Streamlining protests and appeals – This is likely a reference to a desire by the agencies to reduce timelines for public involvement, increase or codify exhaustion requirements, and to further limit opportunities for the public to be informed about and participate in .
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Marvel	Peter		NV	915		Permitting/ 4 Leasing Process	Sreamline the regulations to ease the ability to implement range improvement projects. This includes wells, pipelines, reservoirs and spring developments.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Pauline	Otero County Cattleman's Association		1201		Permitting/ 15 Leasing Process	Some permit/lease renewals and permit/lease transfers qualify for categorical exclusions (CE) and are excluded from the NEPA process. Yet, they both are still required to have a Proposed Decision and Protest Period. In following with this administration's policy of expediting and streamlining federal actions, when there are no extraordinary changes with the permit or lease, it would be prudent to reduce issuance time and eliminate the protest period.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892		Permitting/ 20 Leasing Process	Riparian areas The BLM should enact regulation to expediate any proposed project that would provide water and vegetation resources outside of riparian areas. For example, a local permittee has recently received a functional at-risk rating on a riparian area. The permittee has proposed water and vegetation treatment projects outside the riparian areas to reduce grazing pressure in the riparian area. These projects should be expediated through the process with very limited NEPA requirements

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bottari	Paul		NV	1205	6	Permitting/ Leasing Process	Renewal and transfer of grazing permits should be made simpler and more efficient. If a grazing permit is transferred with ownership of a ranch it should be a simple change on name on the permit. The new owner should be treated the same as the past owner. As far as renewals go the renewal should not have to go through a open public review with a protest period. This is an unnecessary delay and time-consuming process for the public land managers and their time could be spent more effectively actually managing the land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Simkins	Connie	N-4 State Grazing Board	NV	1410	1	Permitting/ Leasing Process	Public land management is an everchanging, evolving action and, as such, the process with which the BLM makes new management decisions should be responsive and in the best interest of the public lands being managed. The endless delay of the renewal and approval process is in direct opposition to the goals of the NEPA process. The Board understands that NEPA was created as a way to protect the environment by creating a system of checks and balances in an attempt to effectively evaluate the impact that proposed changes might have or have had. However, the process has effectively achieved the exact opposite in that the NEPA process takes such a significant amount of time and money that essential management decisions are not being made.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	29	Permitting/ Leasing Process	Public involvement The new regulations need to clarify and make decisions in a transparent process. Plans to reduce already minimal opportunities for public engagement by broadening categorical exceptions to NEPA will provide short term agency benefits but, over the long term, make decisions more vulnerable to legal challenge. Actions that worsen ecological conditions and damage the productivity of the land will become known and face legal problems for BLM. Involving everyone early and providing clear, accurate and complete information helps build trust. Responding to input increases the fairness of the decision process and offers a broader understanding of the issues at hand.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Prunty Rianda	Kyla		NV	902	2	Permitting/ Leasing Process	Permit renewals should not be subject to a protest period. Eliminating the protest period could speed up the renewal process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jackson	Peter	Riddle Ranches, Inc.		1211	3	Permitting/ Leasing Process	Permit renewal process should be smooth and easy. We have heard stories that it was long and tedious. It was made to sound like it was a new permit and had to have all new studies and analysis. It needs to be more efficient.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rimmer	Karen		WY	1345	3	Permitting/ Leasing Process	Permit Renewal Process - Converse County encourages BLM to reassess the adequate level of NEPA necessary to renew a permit. If permits do not require any significant changes and the allotment is meeting Rangeland Health Standards and Guidelines, then the permit renewal should be conducted by utilizing a Categorical Exclusion (CE) verses an Environmental Assessment (EA). For example, consider categorically excluding permit renewals which do not increase or decrease permitted grazing use by more than ten percent. Furthermore, BLM should consider extending the permit terms for 10 to 20 years. This approach would also be more cost and time effective while reducing staffing resources needed to conduct NEPA that is not warranted.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Caines	Philip	Caines Land & Livestock	WY	1496	1	Permitting/ Leasing Process	Permit Processing: Given the indicated initiation conditions, it would appear that every permit needs processed at least each 10 years at its expiration. With the stated 5-7 year processing time line, it may be more effective and efficient to extend the permit term to 20 years. That would at least eliminate those permits that don't have other initiation events. That in itself could probably free up significant resources to decrease the time line for permit issuance.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Sandra	Montana Grass Conservation Commission	MT	1386	1	Permitting/ Leasing Process	Permit Delays and Grazing Permit Renewals: National Environmental Policy Act (NEPA) for grazing permits is a much too lengthy process. Often a simple permit renewal that has no changes will take more than 6 months to renew which causes financial strain and uncertainty to the permit holders. -Once an allotment management plan is approved, range improvements that are part of implementing that plan should not be new decisions subject to administrative appeals or further NEPA analysis. This will allow other agencies to streamline their programs process while decreasing monetary losses. For example, NRCS EQIP programs are on a different timeline and deadlines have not been met as a result of long approval processes with the BLM. Causing monetary losses for the permit holders.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Caines	Philip	Caines Land & Livestock	WY	1496	3	Permitting/ Leasing Process	Permit and Lease Transfers: I support eliminating decisions when the only change is to the name on the permit. I do not support lengthening the 3 year transfer period. I believe the 3 year period is long enough to give the transferee incentive to take adequate care of the allotment, while short enough to allow the transferor the opportunity to end the transfer if the allotment is not being adequately cared for.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schultz	Brad		NV	1327	3	Permitting/ Leasing Process	Permit and Lease Renewals: Grazing regulations needs to develop a process for rapid renewal of permits when there are no important changes for biological, ecological, or management issues se since the last permit renewal, and the operator has annually met all terms and conditions and not been negligent in their management. When these conditions occur, a lengthy permit renewal process is nothing more than a process oriented, box checking exercise that comes with great opportunity cost for agency staff. Development of a decision support tool that asks the appropriate questions, via an interdisciplinary process, should be sufficient to provide adequate support for a quick decision. An integral part of this approach is having adequate monitoring data across the term of the existing permit. If agency staff can spend more time collecting data and less processing paper (i.e., conducting lengthy and unneeded analysis for permit renewals), but still reach valid conclusions due to an adequate decision support system then there is a positive feedback for both the agency and the operator. This approach also may create incentives for establishing more "cooperative permittee monitoring" efforts. Adequate monitoring data and its interpretation is one of the greatest roadblocks to permit renewal. If there is a rapid process for permit renewal, and the permittee believes the process is valid, they may be more inclined to take an active role in collecting monitoring data. That would be a win-win outcome.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Peila	Lori		OR	947	2	Permitting/ Leasing Process	Permit and Lease Renewals need to be handled in a timely manner. If the permit is in compliance and found to be meeting the conditions it should be renewed with the approval of the range specialist, overseen by district guidelines. Leases renewals in good standing should be under 10 year renewals freeing up time for BLM employees for on the ground management. Being able to add this to the CX subset for Rangeland management would free them up for much needed project work

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris			1188		Permitting/ 1 Leasing Process	PERMIT AND LEASE RENEWALS - I would like to streamline permitting and renewal of BLM grazing permits, but I recognize the elimination of protest periods as a double edged sword. Not only would interested groups like (Western Watersheds, USHS, etc) lose the right to protest, but ranchers themselves would lose this essential right. If terms are not fair and science based, permit holders must retain the right to protest. Further permits should be available for more than 10 year renewals. 20-30 year renewals make far more sense in that much of the western landscape is threatened by wildfire and additional livestock grazing is required to reduce dangerous fuel loads. The only way most ranchers will be able to keep and stock additional livestock on the federal permits is by borrowing in order to do so. 10 years or less of permit surety is not enough to guarantee time for repayment of loans.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Blair	Dan			1190		Permitting/ 8 Leasing Process	Our recommendation: * Create no new categorical exclusions and expand use of EAs and EISs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966		Permitting/ 9 Leasing Process	Offering value and flexibility in land use and management, the impact on the land can still be significant. Documentation with a decision is critical to maintain adequate review and to document this review and desired impact. Moving to a decision without adequate public input and the ability to protest should not be considered since it is a vital step in moving to sound decisions that account for specific impact concerns.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Jen			1241		Permitting/ 9 Leasing Process	No new categorical exclusions should be made and the use of EAs and EISs should be expanded.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488		Permitting/ 8 Leasing Process	New range developments need quick and timely approval. New range developments can improve forage use and cattle distribution. New effective range developments to meet standards and guidelines should be analyzed and considered on an annual basis for each permit. Depending on the scope and size of the range project the NEPA process may be avoided where minimal disturbance would occur.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Katlyn	Nevada State Grazing Board N2	NV	1174		Permitting/ 2 Leasing Process	NEPA Process in General Permit renewals and approvals have been negatively impacted by the tedious nature of the National Environmental Protection Act, or NEPA, for years. The Board is highly aware that this slow-moving process operates directly against the Environmental Protection Agency's objective for federal land management agencies to evaluate all of the effects from the proposed actions, including economic, environmental, and social through the NEPA process. This process has negatively affected essential land management activities and managers, namely permit renewals, approvals, and permittees. As a result, the Board believes that Nevada's public lands are being continuously degraded due to the amount of both wasted time and resources currently being spent on the NEPA process. The Board also feels that the process through which the BLM makes management changes and decisions should be evolutionary to keep up with the everchanging nature of Nevada's public lands. Public land management should be responsive in order to keep up with the constant changes on BLM lands. The current NEPA process is so prolonged that effective management is near impossible. While the Board fully understands that NEPA was created to both protect the environment and keep any negative land management changes at bay, the process has unfortunately halted any changes made at all. This has particularly delayed or stopped any positive management changes regarding grazing management and unfortunately has contributed to the spread of invasive annual species, such as cheatgrass, increased fine-fuel loads that directly lead to catastrophic fires, and the overall degradation of sagebrush ecosystems in Nevada. The ability to manage public lands effectively without having to wait decades for those actions to be approved is an essential change that needs to be made for land managers. Direct, on-the-ground observations need to be a stronger guiding force in the NEPA process in addition to the best available science.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sparks	Tom		MT	1110		Permitting/ 2 Leasing Process	Nearly all of our permit renewals have been accomplished in a timely manner. This has been due to the categorical exclusion and little or no objection during the comment period. I do think the comment period is necessary after a proposed decision has been made; however, the comment period should not be extended beyond the original period, thereby speeding up that part of the process. Also if transfer of permit ownership (those with no changes other than a name change) could be done in a simple, prompt manner, it would decrease the time required for a transfer of permit
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Simkins	Connie	N-4 State Grazing Board	NV	1410		Permitting/ 6 Leasing Process	Multiple Use Advisory Council (MUAB) (State and District) In addition to the permitting process being inundated with new directives and fewer and fewer BLM field Range Specialists, the existing overall BLM District process for working with representative groups was also abandoned for a new process that established Resource Advisory Committees (RAC). The RACs replaced the existing Multiple Use Advisory Boards (MUAB) which had for years demonstrated exceptional ability and effectiveness in assisting the BLM to oversee the Land Use Plans, including the implementation and update of these plans. While there is presently a pause regarding reappointment of RACs throughout the west, BLM should review the past MUAC model to learn more details on the manner that these councils functioned. The N-4 State Grazing Board has worked with BLM over the past 40+ years on grazing related matters needs. Over this period of time we have found the MUAC and the District Manager's GAB, while functioning, to be a most effective means of dealing with multiple use and rangeland management on BLM administered lands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	4	Permitting/ Leasing Process	More Flexibility in Season of use and AUMs The UCCA would like to see the regulations and policies of the BLM allow for more flexibility in the dates of use and the allowable AUMs
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sacco	Rex	Sacco Brothers Land & Livestock LLC	UT	1283	2	Permitting/ Leasing Process	More decisions should be made using permittees input and given more consideration. These areas should include but not only apply to reviews of biological assessments and evaluations. Agency personnel and wildlife agencies should share decision making with permittees. Coordination of planning is paramount in continuing viable habit for all species. In conflicting issues, Utah has a mediation process and MOU in place that the Federal agencies have signed on to. This should also be another subject to utilize this process. For purposes of clarification, returning historical definitions and language from the Taylor Grazing Act would be necessary.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cahill	Matthew	The Nature Conservancy	OR	1275	9	Permitting/ Leasing Process	Many of the components necessary for incorporating flexibility currently exist in the regulations and we encourage the BLM to clarify how to utilize them appropriately. Again, we urge the BLM to take a conservative approach with revision to ensure broad stakeholder support for the outcome.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	6	Permitting/ Leasing Process	Maintenance of infrastructure. Many UCCA members have had issues receiving approval from the BLM to maintain infrastructure such as fences, water systems, roads and trails. Although the permittee has signed a maintenance agreement that requires them to maintain structure and they should not need permission they often receive push back from BLM in maintaining these structures. Also, when the access routes to these structures fall into disrepair the permission to repair these access routes is denied. So, while the BLM maintenance agreement requires the permittee to maintain the existing infrastructure the ability to maintain the access to these structures is denied. A possible solution would be to make the regulations clear that the permittee can maintain historic structures and the access to these structures.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lou Schafer	Jonna	Otero County Public Land Use Advisory Council	NM	1335	10	Permitting/ Leasing Process	Livestock grazing is permitted and paid for, whereas many of the other multiple-uses are not. Therefore, permittees/lessees must be included in the decision making process when related to grazing on their allotments and including, but not limited to, exchanges-of-use carrying capacity, crossing permits, designated recreation areas, mining, and mineral extraction. Section 8 of PRIA mandates that the Secretary 'shall' carefully consultate, cooperate, and coordinate, with the lessees, permittees, and landowners involved. Current regulations disregard meaningful consultation, cooperation, and coordination with grazing permittees and lessees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Doverspike	Mark		OR	994	6	Permitting/ Leasing Process	It ought to be allowed to use the least difficult process, ie. a CE over an EA or EIS to get the job desired accomplished. Cleaning a waterhole or spring should be part of the permit without needing additional paperwork. If additional paperwork is required it should be a CE, not the more intensive versions to do maintenance.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	14	Permitting/ Leasing Process	It is critical that the public have robust opportunities to participate in grazing-related decisions, both at the planning level and the site level. We oppose any changes to the grazing regulations that would reduce public engagement opportunities. While the BLM may argue that it is sufficient for the public to engage in larger scale planning processes that address grazing, we strongly assert that the public also needs meaningful opportunities to engage in smaller scale grazing decisions (e.g., issuance of permits/leases) as well. This level of engagement can be particularly important for wildlife where, for instance, specific breeding or brooding areas must be protected. In providing these public engagement opportunities, the BLM must not erect barriers that make it difficult for the public to know of or participate in grazing decision-making as was attempted in the thwarted 2006 revision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	17	Permitting/ Leasing Process	Intent is to preserve grazing use, with its benefits to fire reduction and to vital county economy linked to grazing by prohibiting the "purchase to retire the grazing permit". If a purchaser's decision is to cease grazing appurtenant grazing permits, those permits should be awarded to other livestock operators.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schuldt	Cheryl	North Blaine Co Coop State Grazing District	MT	957	3	Permitting/ Leasing Process	Increasing the efficiency of permit and transfer processing will also increase revenue generated. Financial reports obtained at the scoping meetings document the lack of revenue. The number of unprocessed permits has steadily increased since 2008 while the number of fully processed permits has experienced a downward trend.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Sandra	Montana Grass Conservation Commission	MT	1386	7	Permitting/ Leasing Process	Increase permits from 10-year to 20-year permits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	4	Permitting/ Leasing Process	In effect, limiting and excluding the interested public from the above-mentioned aspects of public land management in the name of administrative efficiency would ignore the valid interests of a wide range of Americans and give far more weight to the interests of ranchers who wish to use public lands for grazing. While grazing is a valid use of public lands under FLPMA, uses for recreation and conservation cannot be ignored, and excluding interested individuals from management decisions affects their interests and simultaneously precludes their right to be involved in the process. Relaxed standards for reviewing and assessing agency action allow private interest groups to effectively capture natural resource agencies to further their extractive agendas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	17	Permitting/ Leasing Process	In analyzing any proposals to limit public involvement in grazing administration or management, the BLM must explain why certain field offices are capable of meeting their legal and regulatory responsibilities under the existing regulations including substantial public participation while others are woefully behind. How many field offices have fully adopted the approach detailed in H-4180-1 and how many have not? The EIS should also include specific examples of where public participation has caused a significant delay in grazing administration or management where the project or proposed decision did not require alteration due to inadequacies in the analysis or ruling by federal courts that the decision was in violation of law.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	22	Permitting/ Leasing Process	In addition, range improvements should be excluded from archeological surveys whenever the area has previously been surveyed. Once surveyed, no further surveys should ever be required in that location, no matter how many "projects" are completed in that location. Our members have repeatedly complained of costly delays and endless deferrals waiting for an archeological survey prior to beginning work on an important project which would greatly enhance the range. Many times, this is the case where a survey has previously been completed, but line officers require one every time a project is completed. This wasteful and redundant practice is not only costly, but effectively preventing rangeland improvements through needless additional surveys.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Rama			1191	9	Permitting/ Leasing Process	In addition to the permitting process being inundated with new directives and fewer and fewer BLM field Range Specialists, the existing overall BLM District process for working with representative groups was also abandoned for a new process that established Resource Advisory Committees (RAC). The RACs replaced the existing Multiple Use Advisory Boards (MUAB) which had for years demonstrated exceptional ability and effectiveness in assisting the BLM to oversee the Land Use Plans, including the implementation and update of these plans. In addition to MUAC, the BLM District offices also had the benefit of Grazing Advisory Boards (GAB) to assist the District Managers (DM) in their oversight of grazing throughout the District. As such, the DM could call on the GAB to assist in priority setting each year for resource needs relating to grazing issues, conflicts and range improvement needs. The GABs were periodically called on to assist the DM with a specific grazing permittee issue that needed to be addressed. The GACs were shown to be invaluable in this regard. In seems the federal advisory committees were used as a means to force abandonment of the use of MUABs and GABs at the time. Certainly, this grazing regulation update now provides the opportunity to reinstate the earlier and more effective advisory boards.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kennedy	Jeremy		OR	931	1	Permitting/ Leasing Process	If a permit is transferred with in the 10 year cycle I see no reason to complete a new nepa.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anon	Anon			1253	1	Permitting/ Leasing Process	I think the process of permit renewals takes too long and could be more efficient. Part of the problem is all the environmental impacts assements done by BLM employees
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Farr	Roy			1243	1	Permitting/ Leasing Process	I think the local BLM field officers should have more authority so they can better work with the ranchers in their area. Both have more experience with the country, and should have a higher level of input.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gordon	Mark			1264	1	Permitting/ Leasing Process	I support expanding the use of Categorical Exclusions where appropriate and streamlining the decision making process in order to allow BLM to improve the efficiency of the permitting and lease process. One example of a process that is already being implemented in part by BLM is the use of Outcome Based Grazing (OBG) Authorizations. The BLM should consider expanding the use of OBG across landscapes and multiple field offices, where appropriate.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burgess	Jeff		AZ	804	1	Permitting/ Leasing Process	I suggest that you should focus on making it easier for the general public to know what's going on between the local BLM staff and the grazing permittees. One example would be to proactively distribute information about how people can become designated as an interested public for a BLM grazing allotment. Also, you can post more grazing-related public documents to your websites, so people don't have to make requests from your staff to see them.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vanderryn	Judith		CO	1423	1	Permitting/ Leasing Process	I believe that the public, who are the owners of these lands, should be MORE involved in hearings concerned with the management of public lands, rather than being bypassed, as these regulations propose to do.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Morrison	Colleen		IL	1006	4	Permitting/ Leasing Process	I am against any attempt by the BLM to limit public knowledge and ability to be involved and express their opinions and concerns.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Micah	12 Ranch	OR	1249	2	Permitting/ Leasing Process	Greater grazing flexibility is needed across BLM grazing grounds. Current practices of same season grazing is leading to a degradation of our rangeland resources.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Sindy	State of Utah	UT	1310	17	Permitting/ Leasing Process	Grazing permit renewals should be included as a Categorical Exclusion (CE) under the NEPA process. Grazing permit renewals substantially similar to completed Environmental Assessment EA's should be categorically excluded. CEs speed up the NEPA process and decrease administration costs. The NEPA process is lengthy and expensive for all parties involved. BLM personnel should be given the opportunity to implement best management practices that would improve the health of the land
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Buzzetti	Rachel	Central Committee of Nevada State Grazing Boards		1158	7	Permitting/ Leasing Process	Grazing Permit Renewals -have been a very cumbersome, complicated, and costly process not to mention have thus created a tremendous backlog on the BLM, whose budget is linrited. We would strongly encourage that the regulation make clear in part 4100 that a permit renewal that does not increase permitted use by more than 10% is a categorical exclusion that does not require an environmental assessment or environmental impact statement. Furthermore, once an allotment management plan is approved, a range improvement implementing that plan within the broad scope of the plan are not new decisions subject to administrative appeals or further NEPA analysis.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892		Permitting/ 3 Leasing Process	Grazing permit renewals The UCCA does not believe a 10-year renewal process is necessary for grazing permits. Grazing allotments are monitored continuously by BLM range specialist and the ranchers therefore concerns are being addressed usually on a year to year basis. The 10-year renewal often serve no purpose to improve range conditions. The 10-year renewal often only restates the management strategies that have been effective the previous years. It also creates additional unnecessary paperwork for the BLM. We know that some of these renewals now require over 100 pages of documents to complete. A possible solution is to do away with the 10-year renewal requirement. The ranges are being monitored and management practices ore being updated on a yearly basis already. Perhaps the 10-year process could be considered a review and not a renewal and the review should not require NEPA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Huston	Erin	California Farm Bureau Federation	CA	982		Permitting/ 22 Leasing Process	Grazing Permit Renewals It is our understanding that BLM would like to include permitting efficiency as part of this scoping process. However, it was not clear to us where in Part 4100 of the regulations this is emphasized. Grazing permit renewals continues to be complicated, costly and time consuming for permittees. This has caused a significant backlog for the Agency and is unnecessarily straining limited resources.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Simkins	Connie	N-4 State Grazing Board	NV	1410		Permitting/ 7 Leasing Process	Grazing Advisory Board In addition to MUAC, the BLM District offices also had the benefit of Grazing Advisory Boards (GAB) to assist the District Managers (DM) in their oversight of grazing throughout the District. As such, the DM could call on the GAB to assist in priority setting each year for resource needs relating to grazing issues, conflicts and range improvement needs. The GABs were periodically called on to assist the DM with a specific grazing permittee issue that needed to be addressed. The GACs were shown to be invaluable in this regard
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	HANSEN	NIELS		WY	794		Permitting/ 4 Leasing Process	Flexibiliy: There are numerous studies recognizing the value of managed livestock grazing to achieve range management objectives. BLM regulations should be streamlined to allow more flexibility in tools such as timing and herd size when used for fuel load management (fire control), landscape scale treatment of invasive species and habitat improvement for Endangered Species to name a few. Livestock grazing is the most cost effective tool BLM has to address landscape scale issues and the regulations should recognize it and endorse it.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kinsey	Anne	Oregon Cattlemen's Association and Oregon Public Lands Committee	OR	999	43	Permitting/ Leasing Process	Finally, in cases where an adverse determination has been made, BLM should also adopt the following process to renew a grazing permit: * Applicable monitoring data must be collected with careful quantification and application of scientific protocols. * BLM should prepare a draft allotment assessment without a pre-determined assumption that the causal factors relate to livestock grazing. * BLM should notify permittee(s) that submission of a permit renewal application is required. While it is appreciated that the permittee(s) may not know at the time of the application as to BLM's causal factor determinations, the permittee(s) will be given an opportunity to submit the permit renewal application. * BLM should issue final rangeland determination and land use plan objectives determination, along with notice as to the permittee(s) and to the public of either of the following: o If there are no adverse determinations, and if the permittee(s) does not apply for any substantially new or different terms and conditions, BLM should provide notice to the permittee(s) and to the public that BLM will prepare a categorical exclusion, as authorized by the Federal Land Policy and Management Act, 43 U.S.C. § 1752(h), and issue a proposed decision to renew the grazing permit o If there are adverse determinations and/or if the permittee(s) applies for a permit renewal with substantial new or different terms, BLM should provide notice to the permittee(s) and to the public that BLM will prepare a NEPA document for public comment. This notice should also ask the permittee(s) to submit any modified permit renewal application to be assessed in any NEPA document. o If adverse determinations are made and an affected permittee owns or controls private grazing resources in an amount equal to or greater than 10% of any pasture or the allotment as a whole, the permittee may request and BLM will develop an AMP or functional equivalent management plan to be analyzed in any NEPA document. * Following required analyses and determinations, BLM should follow regular NEPA protocols. * If necessary, BLM should supplement the final NEPA document, and issue a final decision.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hennessy	Eileen		ME	1199		Permitting/ 5 Leasing Process	Finally, I fiercely oppose a streamlined protests and appeal process by the BLM to reduce timelines for public involvement, increase or codify exhaustion requirements, and to further limit public involvement in decisions regarding livestock grazing on public lands and within Wilderness.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carney	Cheryl		TX	179		Permitting/ 10 Leasing Process	Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Atkinson	Susan		CO	633		Permitting/ 5 Leasing Process	Expanding the use of categorical exclusions – i.e. completing fewer full and fair environmental analyses – and undermining public participation opportunities in the process.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baltzor	Catherine		OR	929	3	Permitting/ Leasing Process	Expanding or adding to the already approved uses of a Cx would enhance efficiency in the permitting process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harshbarger	Jean	4W Ranch	WY	1435	1	Permitting/ Leasing Process	Do not allow permits to be permanently retired. You lose the most valuable tool - ranchers. I watch over and care for the land [Illegible text] and domestic animals to help manage forage and provide food and other benefits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Logan	donna		PA	221	6	Permitting/ Leasing Process	Create no new categorical exclusions and expand use of EAs and EISs. Facilitate greater levels of public engagement, including through posting monitoring reports online for public review, inviting the interested public to attend field visits, and notifying the public of all grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mayer	Christopher		NV	824	1	Permitting/ Leasing Process	<p>Comment 1 This comment is in reference to NEPA categorical exclusion authorities, specifically referencing the handbook section as follows below relative to “Approval of transfers of grazing preference”. However a decision document that meets program specific guidance in this case is required. As referenced below also. When transfers of grazing preference are approved, part of the process includes issuing and approving a grazing permit. Grazing permits issued and approved associated with grazing transfers do not change the terms and conditions. If they were to change then a NEPA document and decision would be as currently be required. If the grazing period only includes a name change that should not require issuance of a decision because the terms and conditions would not change. In addition. The grazing permit that would be issued to the new transferee would have already if fully processed and renewed been sent to the public for ccc for the proposed (protest and if needed the final decision . Public and permittees already have had an opportunity to CCC therefore this requirement for a CX and decision should be eliminated. This is an action designated as a CX as referenced here: Appendix 4 - 147 H-1790-1 - NATIONAL ENVIRONMENTAL POLICY ACT HANDBOOK – (Public) APPENDIX 4 BLM Categorical Exclusions The following actions are designated as categorical exclusions (CXs) pursuant to 516 DM 11.9 BLM MANUAL Rel. 1-1710 Supersedes Rel. 1-1547 01/30/2008 D. Rangeland Management 1. Approval of transfers of grazing preference. 20 H-1790-1 - NATIONAL ENVIRONMENTAL POLICY CT HANDBOOK – (Public) BLM MANUAL Rel. 1-1710 Supersedes Rel. 1-1547 01/30/2008 4.2.3.2 Documentation Requirements When Using CXs Not Established by Statute If you document which categorical exclusion applies, you must use the form provided in Appendix 6, Categorical Exclusion Documentation Format When Using Categorical Exclusions Not Established by Statute. This form must be included in the case or project file. This form does not constitute a decision document, and you must issue a decision document that meets program specific guidance</p>

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	13	Permitting/ Leasing Process	Change in management plans or new uses The UCCA would like the BLM to be required to inform the permittee in writing of all changes in management plans or uses on any of the permittees effected allotments. The BLM has at time allowed for new uses on allotments without notifying the permittee. Theses new uses can create forage damage and infrastructure disruption that is sometime mistakenly attributed to grazing. These new or increased uses may also increase grazing pattern disruption and may require infrastructure construction for the new use. Requiring BLM to notify the permittee before all changes would allow the permittee to adapt management strategies and work with other users to reduce potential conflict. Also, many of the traditional trail systems and infrastructure developed by permittees have become popular for use by other uses such as atv, hiking, camping, mountain biking and hunters. While the UCCA recognizes these other uses as important to local communities, we do not believe the BLM should enact any regulation that would exclude permittees from the use of their traditional trails or structures.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dieterich	Michele		MT	235	2	Permitting/ Leasing Process	Categorical Exclusions are not necessary to strealine process. The process is sound. Public comment and input is essential on public lands. The BLM does not adequately assess grazing lands and permits as it is. There is no reason to streamline or reduce analysis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cotter	Justina		AZ	437	1	Permitting/ Leasing Process	BLM proposes to improve “grazing permit administration” and “permitting efficiency,” increase the use of Categorical Exclusions and streamline the protest and appeals processes. Reducing environmental analysis and limiting opportunities for the public to be informed about and participate in grazing management decisions is anti-democratic. These are our lands, and we should have every opportunity to engage with government officials on the decisions that they are making in our name. If anything, this is only becoming more important as the government makes decisions that impact our ability to mitigate climate change.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	10	Permitting/ Leasing Process	BLM itself acknowledges that modification ofor renewal of a grazing permit is a 3-5 year process regardless of the number of such permits that must be completed. During the permit renewal effort in the Owyhee Field Office in 2013 the fixed action time lines resulted in hurried and dubious determinations that relied on badly out dated data, data that is erroneous on its face and in many cases there was a complete lack of essential information. Further, the legal time line caused BLM to arbitrarily excluded any consideration of range improvements and thus denied opportunity to address RHS issues without making huge cuts in permitted use. Nonetheless, BLM issued decisions resulting in massive reductions in grazing use that will be in effect for 10+ years.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smallwood	Lori	Big Horn County Commissioners	WY	1223	1	Permitting/ Leasing Process	Big Horn County asks that BLM consider revising the grazing regulations to allow greater management flexibility on a district and field office level and permit-to-permit. Conditions vary significantly from one allotment to the next throughout the West and land managers should have the authority to respond efficiently and effectively to specific rangeland needs. For example, so long as resource conditions are favorable, BLM should allow permittees to adjust the dates on which they move livestock on and off of rangelands. Often, in the Mountain West, a long winter can impede a permittee's ability to get on public lands for grazing or a warm spring may call for earlier entry. Presently, the dates provided in a permit are rigid-there is no deviating from them without additional analysis. BLM should consider granting for timing flexibility when conditions permit or require.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Graves	Wayne		WY	1383	2	Permitting/ Leasing Process	Base property requirements should not be changed. Protest period opportunities should remain. Weed control should be expanded. Leases with good management and condition should be streamlined for renewal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sun	Dennis			1195	1	Permitting/ Leasing Process	As a rancher with Section 15 BLM lands, I would like to see those Section 15 lands returned to a lease instead of a permit. The BLM lands and all of my private and state lands are so intermingled, I need to manage them as one. It would give me much more flexibility with livestock management and to assess range conditions, as my permit now is from May 1 to October 31. Under a permit, it takes some time to change management, due to a drought or improved range conditions. Under a lease, I would be agreeable to undertake approved monitoring practices to validate that I'm doing a good job, as I'm already under a self monitoring program and have been the last 30 years. If my pastures are range-ready for turnout before May 1, I would like to have the opportunity to turn out and let the range conditions determine when I leave with the cattle, not go by the calendar. Being under a lease would allow for better management of all lands, would also lessen the workload of my Range Con and as we realize, flexibility provides for better management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	1	Permitting/ Leasing Process	-Any Animal Unit Months (AUM) authorized by such permits should not count toward the permitted AUMs of an existing preference grazing right or term permit -The issuance of such permits should be categorically excluded from NEPA analysis -Such permits should not be issued if they conflict with existing preference grazing rights or term permits -Such permits should be administered with the appropriate regulatory flexibility (as expounded in BLM Instruction Memorandum No. 2018-109) necessary to achieve the desired management objective -BLM may issue decisions authorizing nonrenewable grazing permits in full force and effect under subpart 4160 of title 43
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Maryboy	Kenneth	San Juan County Commission	UT	1427	4	Permitting/ Leasing Process	Another opportunity would be to provide for more flexibility in the terms and conditions of the permit to allow the grazing permittee and BLM to make timely changes in the grazing operation to make judicious use of unexpected range conditions such as excess forage or fire fuels. Such timely action would contribute to improved range condition and decrease the potential for wildfire. Without this pre-approved flexibility the opportunity for timely response would likely be lost due to the time consuming procedural steps necessary for approval of an unplanned response.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sun	Dennis			1195	2	Permitting/ Leasing Process	Also, I have part of a set of corrals on BLM lands under a section 4 permit. I would like the opportunity to purchase or exchange those lands in a timely manner. I have a number of isolated 40 acre BLM lands that I would like to acquire, it is impossible to purchase or exchange for them now, never mind the lengthy NEPA process it would take.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Jen			1241	7	Permitting/ Leasing Process	Allow the public to comment on each permit renewal.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Jen			1241	4	Permitting/ Leasing Process	Allow more, not less public participation in the grazing program by posting monitoring reports online, inviting the public to attend field visits, notifying public of all grazing permit decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	14	Permitting/ Leasing Process	7. The regulations should allow extending the duration of grazing from 10 years to 20 years. The time it takes to follow the current permit renewal process is extensive and currently can take up to 5 years or more for a permit to be fully processed. The current timeline does not allow for any potential management changes to be assessed appropriately. Again, a true adaptive management approach under the regulations would help overcome some of these difficulties.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nagel	Clinton	Gallatin Wildlife Association	MT	949	7	Permitting/ Leasing Process	7. regulations that would create further categorical exclusions. Categorical exclusions are detrimental to a healthy landscape and are used as an excuse to expedite a specific cause or project. It undermines science and it undermines the public's voice to raise concerns to that project. Limit the use of categorical exclusions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	31	Permitting/ Leasing Process	4130.2 Grazing permits or leases -BLM must recognize Congressional instruction and modify the rules to state that all grazing permits shall be renewed pursuant to 43 U.S. Code § 1752 (h) which specifically requires the renewal of permits or leases by CAT EX so long as land health standards are being met and the current grazing management of the allotment will continue. In addition, CAT EX should be used for all preference renewals, regardless of whether current grazing management will continue, so long as the rules have been complied with as required in TGA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Searle	Bryan	Idaho Farm Bureau Federation	ID	802	21	Permitting/ Leasing Process	4120.3 Range Improvements - All range improvements which are contemplated in any existing land management documents, including AMPs, should not require any additional NEPA, but should move forward under a CAT EX under all but the most extreme cases. By definition, range improvements enhance the range. There should be no need to review the environmental effect prior to making a decision. Furthermore, range improvements typically would not rise to the level of a "major federal action" under the CEQ definition of such, especially under the NEPA updates being considered currently.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	10	Permitting/ Leasing Process	4. If a grazing allotment is maintaining proper outcomes and objectives that permit renewal should be expedited using a Categorical Exclusion (CE) instead of doing a full analysis through an Environmental Assessment (EA). Expediting permit renewal for these allotments would enable BLM to work on other important areas or projects.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	16	Permitting/Leasing Process	4) The BLM must allow and facilitate greater levels of public engagement, including increased access of public participation such as posting online monitoring reports for public review, inviting interested members of the public to attend field visits, and notifying and engaging the public to participate in all grazing permit environmental processes and decisions. Also, the BLM must increase not reduce transparency of its public involvement processes including notification and participation in environmental documents. The National Environmental Policy Act is a bedrock law passed in a bipartisan manner in 1969 to address environmental concerns, and encourage public participation in federal land management and resource issues. We emphasize BLM must NOT diminish public participation in these regulatory processes by shortening timelines for review and comment, limiting access to scoping, draft and final documents and decisions, and eliminating transparency.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	15	Permitting/Leasing Process	3) No new categorical exclusions should be allowed, and the use of EAs and EISs must be expanded and not diminished to allow full public participation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	14	Permitting/Leasing Process	2) The BLM must allow for grazing permit retirements, voluntary permit reductions and long-term nonuse for conservation purposes. Retirement of pastures and allotments must be allowed to provide more flexibility in grazing options as well as restore native habitats.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Pearce	Benjamin	Pearce Trust	NM	937	1	Permitting/Leasing Process	1) Pearce Trust supports the proposed plan to eliminate the protest period on NEPA exempt renewals. This will relieve some of the administrative pressure in local field offices and allow them to renew and processes new applications more efficiently.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Harvey	Bill	Baker County	OR	747	8	Permitting/Leasing Process	» Require BLM to: -Authorize permits il,la timely manner especially' temporary or emergency permits in response to wildfires -Monitor allotments 'and communicate regularly 'with allotment permit holders - be forthcoming 'with concerns about land health and what the permit holders should do to reduce or eliminate the concern -Use allotment closure, only as a last resort and, only until and health recovery (not permanently) -Notify owners of trespass livestock for immediate removal -Treat noxious weeds an, d invasive junipers annually

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	3	Permitting/Leasing Process	"Streamlining" the grazing permitting process sacrifices democracy by depriving citizens of their right to engage in the political process. Opportunities for public comment are critical to ensure that agencies receive a wealth of information from various sources. This allows the agencies to make an equitable and informed decision. "Sometimes agency officials may lack resources, lack expertise, or simply be so new to the job that they are unable to research or articulate defenses for their positions as well as a commenter might."4 It is essential that BLM allow for the public to provide their input on the activities happening on our public lands. BLM should ensure that "streamlining" the process will not allow for government agencies to cut corners, put economic efficiency before science, and devalue the voices of the public at large. In these new grazing regulations, BLM should strive for maximum public participation and involvement. 4 Donald J. Kochan. The Commenting Power: Agency Accountability Through Public Participation, 70 OKLA. L.REV. 601 (2018).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Frank		ID	1281	5	Permitting/Leasing Process	- Please simplify the grazing permit renewal process as well as provide more predictability to grazing access on federal land. The current federal approach is unpredictable and introduces significant risk to livestock producers that rely on some federal range as part of their annual operation. Impacts to individual producers results in a ripple effect that also impacts non-federal land grazers and other local rural businesses
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dearing	Jaydee abd Terry	Dearing Ranch	OR	1370	1	Permitting/Leasing Process	We support targeted grazing as a fine fuel management tool. The regulations will better facilitate use of this tool by incorporating the following changes: · The issuance of targeted grazing permits should be issued under programmatic NEPA (including this EIS) and site-specific applications categorically excluded from NEPA analysis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Ade	Kane County Commissioners	UT	1141	14	Permitting/Leasing Process	Unfortunately, existing BLM regulations are not conducive to implementing rotational grazing systems on BLM allotments, and the NEPA analysis for such projects can take up to 7 to 10 years or more. Out-of-date regulations have made rotational grazing projects a particular target of litigious organizations which oppose rotational grazing and seek to delay projects indefinitely. Updated BLM regulations should help BLM range personnel perform timely NEPA analysis for rotational grazing projects, as well as related administrative tasks such as consolidating grazing allotments
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Petersen	Ray	Emery County, UT	UT	1313	9	Permitting/Leasing Process	The BLM currently has the ability under a Categorical Exclusion to renew a grazing permits with existing terms and conditions. This is an efficient process that benefits permittees and makes smart use of BLM resources. This Categorical Exclusion should be extended to all permit renewals, even when terms and conditions change. Thousands of permits have now been analyzed with Environmental Assessments (EA) that resulted in a Finding of No Significant Impact (FONSI). Renewals with terms and conditions that are substantially similar to EA's that were previously completed shou ld be Categoricala lly Excluded and not require an additional NEPA analysis. Ultimately this will allow both permittees and BLM personnel to spend less time on paperwork and more time working on the range, taking care of livestock and managing the land. In situations where there are previously identified issues that result in the need for additional analysis, that analysis could occur prior to future permit renewals on those specific allotment. But overall policy should be that permit renewal is categorically excluded from the NEPA process, even under new terms and conditions. The BLM should utilize existing EA whenever possible and avoid duplication of previous paperwork and analysis.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	7	Permitting/ Leasing Process	Not all permit holders are the same in their commitment to maintaining range health. Transferring without a decision from the BLM will run the risk of inadequate review and accountability. The BLM should seek to add longer terms on the permit transfer, this would reduce admin cost and process while also reducing grazing flexibility. It appears this issue may stem from a permit staffing issue. Therefore, the BLM should address this with requests to hire adequate staff to be able to process permit changes in a timely fashion instead of cutting the process to account for lack of staff for processing
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Ade	Kane County Commissioners	UT	1141	1	Permitting/ Leasing Process	Kane County would like the BLM to consider exploring the effects of making grazing permits more flexible, allowing range cons and permittees to form grazing plans to consider conditions on the ground. This would allow for the agency to use the most up to date evidence based best practices for rangeland management. This would also help with the management of invasive annual grasses and the promotion of soil health. The BLM should also consider providing livestock producers with greater flexibility regarding on-off dates on BLM grazing allotments
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sedman	James	North Platte Valley Conservation District	WY	799	1	Permitting/ Leasing Process	Flexibility should be the main emphasis in any changes to grazing permits/leases. Resources can be more effectively managed and potential problems can be better addressed if lease holders have more built in flexibility in their leases and are more closely linked to conditions on the ground. This will help increase soil and resource health (a goal for local conservation districts), as well as provide for better management of invasive species. For instance, turnout dates should be flexible if cheatgrass and other early season weeds need management. Targeted grazing and outcome based grazing are some good examples of flexibility as well.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	Tony		ID	1087	2	Permitting/ Leasing Process	Categorical Exclusions for Trailing and Crossing Permits In the Grazing Improvement Act (S.258, 113th Congress 2014) an act which Benda personally testified in front of Congress on, the categorical exclusion for trailing and crossing permits was addressed. Often times the process was complicated and the timing and completion due to the NEPA analysis was not accomplished for the permit. BLM needs to establish functional and timely process and framework for these procedures and make sure that is conveyed to all field offices. BLM has the authority to use categorical exclusion for trailing and crossing, and the regulations should make that authority clear.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mori	Peter	Mori Ranches, LLC		1149	2	Permitting/ Leasing Process	2) Grazing permit renewals are taking too long to administer. We were told that if we needed to make any changes in our existing permit that NEPA would be required it may take years so we had to renew without some changes that would have been beneficial to the resource.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burton	David		UT	1057	1	Permitting/ Leasing Process	- It is important that decisions are allowed to be made on a local level. The field offices need to work closely with local individuals. This will help there to be a better understanding of the needs of the local resources and people. - Every area needs to have flexibility that allows for decisions based on different topography, climate, ecosystems, ect. Right now there are blanket policies that do not work for all situations. Each area is different than the next and this needs to be considered. - Ranchers should be allowed to propose potential projects and give input on other projects. They know the land and resources thoroughly as they work with them through their operations.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Federspiel	Mathieu		OR	751		3 Permitting/Leasing Process	Regarding Station 3, Opportunities for Involvement: This raises the concern of hiding processes from the public, of reducing the chance for public involvement, and of government overreach in creating processes for controlling public land without public involvement. The current NEPA process has been successful for decades and needs to continue in order to allow all interested parties the ability to comment on public land management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Federspiel	Mathieu		OR	751		2 Permitting/Leasing Process	Regarding Station 2, Improving Permitting Efficiency: This reads as an effort to hide the permitting process from public scrutiny. Issuing AUMs may be done on a yearly basis, and questions of rangeland health or fire control seldom change during the year; this would indicate poor planning. Permits must continue to be open to public review and go through a proper review process in order to avoid undue influence by select interests.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carollo	Dominic	Harney County	OR	1045		7 Permitting/Leasing Process	“Public Participation” – Harney County supports BLM’s decision to explore ways in which adequate public participation is protected, while also avoiding an unnecessary and unduly burden on the administrative process. Harney County supports increasing the efficiency of district offices and the conservation of agency resources by refining and tailoring the scope of public participation on a case-by-case basis appropriately.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sedman	James	North Platte Valley Conservation District	WY	799		2 Permitting/Leasing Process	Local input and management should also be central to any change implemented. We feel that the best practices for managing grazing (and other associated) resources are most effective when planned for and implemented at the local level. This includes local conservation districts, weed and pest districts, and the lease-holders themselves. Allowing more flexibility and local input provides better and more effective management for all stakeholders involved, not just the grazing lease holder. Weeds and other invasive species are better controlled and managed, as well as wildlife habitat benefits from these practices. Local partners such as conservation districts can provide resources for habitat and soil improvements as well, such as planting tree shelterbelts.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlson	James	Montana Natural Resource Coalition		1342	23	Permitting/Leasing Process	Issue: Ensuring permittee/lessee ease of access through improvement of permitting for trailing and crossing of livestock across public lands. Explanation: Because the purpose of TGA grazing lands is to support and protect the livestock industry, and because NEPA mandates balancing of the needs of the natural environment and those of the human environment, and the CEQ NEPA implementing regulations call for protecting and enhancing the human environment, EIS alternatives should explore adoption of permitting practices that more fully facilitate the movement of livestock across public lands with a lower administrative burden than permittees and lessees currently experience. Ease of permitting, including options to decentralize processing to the most local administrative unit possible, including grazing district boards, should be included as EIS alternatives. Where 43 CFR § 4130.8-3 says that a service charge may be assessed, at least one of the alternatives should call for waiver of the charge. Criteria: NEPA/CEQ: 42 USC § 4331. Congressional declaration of national environmental policy - "(a) Congress,,, declares that it is the continuing policy of the Federal Government, in cooperation with State and local governments, and other concerned public and private organizations, to use all practicable means and measures ... to create and maintain conditions under which man and nature can exist in productive harmony, and fulfill the social, economic, and other requirements of ... Americans." 40 CFR § 1500.2 Policy - "Federal agencies shall to the fullest extent possible: ... (f) Use all practicable means ... to restore and enhance the quality of the human environment..." 40 CFR 1508.4 Categorical exclusion "Categorical exclusion means a category of actions that do not individually or cumulatively have a significant impact on the human environment ... and for which, therefore, neither an environmental assessment nor an environmental impact statement is required." 43 CFR Part 4100: 43 CFR § 4130.6-3 Crossing permits - "A crossing permit may be issued by the authorized officer to any applicant showing a need to cross the public land or other land under Bureau of Land Management control, or both, with livestock for proper and lawful purposes. A temporary use authorization for trailing livestock shall contain terms and conditions for the temporary grazing use that will occur ..." 43 CFR § 4130.8-1(b) "... (b) Fees shall be charged for livestock grazing upon or crossing the public lands and other lands administered by the Bureau ..." 43 CFR § 4130.8-3 - A service charge may be assessed for each crossing permit ..." TGA: 43 USC § 315 - "... the Secretary shall grant to owners of land adjacent to such district, upon application of any such owner, such rights-of-way over the lands included in such district for stock-driving purposes as may be necessary for the convenient access by any such owner to
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Oster	Sherry		CA	1056	2	Permitting/Leasing Process	Create no new categorical exclusions and expand use of EAs and EISs.
Taylor Grazing Act								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Flores	Barbara		CO	1280	2	Taylor Grazing Act	The purpose of the Taylor Grazing Act was "to stop injury to the public grazing lands by preventing overgrazing and soil deterioration..." This seems to no longer be the goal of the BLM and the permittees. An increase in grazing use of our public lands, whether permitted or trespass would only serve to violate that Act also, Instead of making it easier for livestock owners to graze more livestock for longer periods, any regulation changes should further the goal of preventing overgrazing, considering wild horses and burros "comparably" with private livestock, and managing our public land according to the public's wishes.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	O'Keeffe	John	Oregon Grazing District 1	OR	1011	6	Taylor Grazing Act	Specifically, the BLM falsely maintains that: 1) No distinction is made in FLPMA between permits and leases. -This is incorrect. The BLM itself acknowledges that "[i]n sections 401 through 403 of FLPMA, which deals with grazing management on the public lands, the term "permit or lease" appears over 25 times together." That FLPMA consistently distinguishes "permit" from "lease" is a clear acknowledgement that the statute does not equate the two. What FLPMA does not do is rehearse the different management mandates for permits on Section 3 lands and leases on Section 15 lands. There is no need for FLPMA to do this. The distinction is made in the TGA, which (with a few negligible exceptions) remains in full force and effect.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	O'Keeffe	John	Oregon Grazing District 1	OR	1011	2	Taylor Grazing Act	we find that the existing regulations obscure the legally significant distinction made in the TGA between a grazing district under Section 3 of the TGA on which grazing is a primary, presumed use (and on which the BLM issues a grazing "permit")2 and "isolated or disconnected" lands that lie outside of grazing districts under Section 15 of the TGA which the Secretary may graze "in his discretion" (and on which the BLM issues a grazing "lease").3 The current regulations' failure to sufficiently recognize and clarify this critical distinction has caused confusion; the BLM wrongly interprets the regulations' silence on this distinction as indicating that "[m]anagement of the public lands in section 3 and section 15 are now the same," and as reaffirming that "[t]he clear intent of Congress is that BLM's grazing administration on all public lands be consistent for both permits and leases."4 Below, we give evidence that shows these assumptions are both incorrect and harmful. 2 43 U.S.C. 315b. 3 43 U.S.C. 315m. 4 From the BLM document The Taylor Grazing Act. This document was formerly posted at http://www.blm.gov/nv/st/en/prog/grazing/taylor_grazing_act.print.html , but has recently been removed. It has been reposted at http://wildhorsewarriors.blogspot.com/2009/07/taylor-grazing-act-blm-born-of-us.html and at https://fdocuments.in/document/the-taylor-grazing-act-hlrn-120-the-taylor-grazing-act-was-established.html
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Rankin		NM	1179	2	Taylor Grazing Act	We cannot sustain if we do not appropriately manage our land and we know this. Part of this could be mediated by reinstating "Grazing Advisory Boards" as per Section 18 of the Taylor Grazing Act.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Liroky	Roger		MT	1398	3	Taylor Grazing Act	The original goals of the Taylor grazing Act of 1934-36 need to be adhered to. One of the original precepts of that law was for food production. The others were to improve and enhance over time the range land resource.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stone	Gary	Otero County Cattleman's Association	NM	1201	9	Taylor Grazing Act	should a permittee/lessee prefer to construct improvements on their allotment at their own expense, they should not be forced to enter into a cooperative agreement nor strictly be limited to "removable range improvements'. Section 4 of the TGA does not refer to 'removable' range improvements. Private funding of installation and ownership of either permanent or removable improvements by Section 4 Permit must be reinstated. Section 4 affirms private ownership in that it states "No permit shall be issued which shall entitle the permittee to the use of such improvements constructed and owned by a prior occupant until the applicant has paid to such prior occupant the reasonable value of such improvements to be determined under rules and regulations of the Secretary of Interior".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Davis	Chance		SD	749	1	Taylor Grazing Act	My comments are concerningthe regulations on what were leases under Sec 15 of the Taylor Grazing Act. In South Dakota these lands are primarily intermingled with private lands and consequently need to be managed holistically within the ranch grazing plan. I would comment that these leases in South Dakota would be ideal for flexible and minimal regulation since historically 98% meet Standards and Guidelines for rangeland health. These lease lands do not work well in the one size fits all approach of the current grazing rule. BLM should prioritize monitoring rangeland health and quit trying to micromanage livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Pearson	Tammy		UT	1065	1	Taylor Grazing Act	I believe the intent of the Taylor Grazing Act was to give preference to grazing as the predominant use of the public lands in the West. The ability to settle the land and make a living was contingent on this use and early settlers were awarded the rights to graze the land and establish ranches and homesteads as they settled the land. These preferences predate the creation of the BLM when they were originally vested under the Taylor Grazing Act and administered by the Division of Grazing. The original grazing preferences and leases were eventually abandoned in favor of the permit system we have today. Over the years, grazing regulations and grazing permit allocations have seen significant changes. I believe we need to reassess the values and importance that were originally established under the Taylor Grazing Act that honored the ranching lifestyle and the roll cattle grazing plays on our public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fahlgren	John	Valley County Commissioners	MT	1143	2	Taylor Grazing Act	Any changes in BLM's grazing regulations must conform with the Taylor Grazing Act. Language should be strengthened to clearly state applicants for grazing permits in Taylor Grazing Act Grazing Districts must be engaged in the livestock business. These Grazing Districts were established for livestock grazing and should not be available for organizations or individuals not directly involved in the livestock business.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	3	Taylor Grazing Act	Section 4 permits, under the TGA, should be re-instated with the option of a permittee to fully fund an improvement if they desire. There are still provisions for co-operative agreements also. Title to said improvements should be in the name of the permittee that fully funds the improvement. Co-operative improvements should share title according to the shared costs. The process to approve such improvements should be shortened drastically to make the process and work more timely. The Grazing Advisory Boards, that were set up under Sec. 18 of TGA, should be reinstated. They would be much more efficient that the current system of Resource Advisory Councils of FLMPA.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Roeber	Mark		CO	1454	2	Taylor Grazing Act	5) Mandatory qualification - Needs to be reinstated. Rural lifestyles and economies are ties to this. Taylor Grazing Act was set up to ensure that local economies relied on people being around the whole yr. Biggest problem with going just to recreation based economy is just seasonal. Ranchers employ and spend money throughout yr. Tourists and rec jobs come and go with the season.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stone	Gary	Otero County Cattleman’s Association	NM	1201	5	Taylor Grazing Act	The land is not owned by the 'public', but is held in trust and managed for multiple use on behalf of the public. The public in general is not affected and does not have a vested/economic interest, nor does it have right, title, or interest as defined by the TGA. Therefore, 'interested public' should be taken out of the equation. The Grazing Regulations should always make reference to Section 3 and Section 15 of the TGA where applicable.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Weingart	K.C. & Teri	Swinging H Cattle Co.	MT	1493	1	Taylor Grazing Act	The BLM must follow the Taylor Grazing Act. It was implemented to improve rangeland health
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klein	Tammy	Central Valley and Penasco Soil and Water Conservation Districts	NM	1144	3	Taylor Grazing Act	Reinstate section 3 and 15 of the Taylor Grazing Act. This should remain as reference law for BLM regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Teske	Dennis	Prairie County Commissioner	MT	1425	1	Taylor Grazing Act	One thing I noticed was left out of the information at the meeting was how the Taylor Grazing Act will stay the law of the land and how it will affect what the BLM is proposing in this Grazing Regulation. Please respond to this issue as it is critical as these progresses. I didn't see any Taylor Grazing District Maps included at that meeting. Taylor Grazing includes a very large portion of eastern Montana. It also affects a great number of acres. The BLM must adhere to the Taylor Grazing Act.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sacco	Rex	Sacco Brothers Land & Livestock LLC	UT	1283	2	Taylor Grazing Act	More decisions should be made using permittees input and given more consideration. These areas should include but not only apply to reviews of biological assessments and evaluations. Agency personnel and wildlife agencies should share decision making with permittees. Coordination of planning is paramount in continuing viable habit for all species. In conflicting issues, Utah has a mediation process and MOU in place that the Federal agencies have signed on to. This should also be another subject to utilize this process. For purposes of clarification, returning historical definitions and language from the Taylor Grazing Act would be necessary.
Federal Land Policy and Management Act (FLPMA)								

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	O'Keeffe	John	Oregon Grazing District 1	OR	1011	5	Federal Land Policy and Management Act (FLPMA)	However, the regulations are otherwise silent on how the administrative mandates of Sections 3 and 15 differ. The regulations therefore give no instruction to the BLM on how managing grazing districts differs from managing "isolated or disconnected" lands, or even that their management differs at all. The regulations' silence is confusing because subsequent regulations for implementing FLPMA grazing provisions (e.g. identifying lands "available for grazing;" "cancellation of permits;" "closing of allotments") will require different criteria depending on whether grazing is a primary, presumptive use (as on a Section 3 grazing district) or if grazing is discretionary (as on "isolated or disconnected" Section 15 lands outside of grazing districts).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schultz	Nancy		UT	1495	2	Federal Land Policy and Management Act (FLPMA)	Without Regional Advisory Committees (RAC) which included environmental groups, interested parties, commercial interests like outfitters and hunting and fishing guides there will be much less of a public voice. Collaboration is taking the place of the RAC. However, a collaborative group can be any thing-a group of user groups like livestock supporters that do not allow others like environmental groups, and if they do allow others, the structure is such that it is not a consensus agreement, only a vote. This collaborative structure is detrimental to decision making that ensures protection of ecosystems.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Menges	Jeff			1307	15	Federal Land Policy and Management Act (FLPMA)	The existing narrative after "multiple use and sustained yield" conveys a level of detail for the contents and purpose of the LUP that the WSGB feels may be in excess of Congressional intent in the FLPMA and may also be restrictive on the ability of the current Secretary of Interior to determine the content and purpose of a BLM - LUP.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stone	Gary	Otero County Cattleman's Association	NM	1201	10	Federal Land Policy and Management Act (FLPMA)	Section 402(g) of the Federal Land Policy Management Act (FLPMA) reaffirms that permittees/lessees shall receive reasonable compensation from the United States should their permit be canceled in whole or in part. This depicts ownership. Title to privately funded improvements must belong to the private interest.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	McLeod	Dale		NJ	2	1	Federal Land Policy and Management Act (FLPMA)	I think it is ludicrous that PRIVATE entities are allowed to have their business conducted on PUBLIC LANDS. Years ago, it may have been acceptable, as our U.S. population was less. IF they absolutely MUST be multiple use,.....it should be regulated to be MUCH less than is on Public Lands now.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keck	John E.			1482	6	Federal Land Policy and Management Act (FLPMA)	One Year Horizons on all EAs, NEPAs, or other planning documentation must be set in motion. All delays passed that point should be assessed by RAC boards, Sec. 309, for review and reporting to the Secretary as set forth in FLMPA. The pattern of up to six years to put a pipeline in is unacceptable.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	22	Federal Land Policy and Management Act (FLPMA)	The notice indicates BLM is considering addressing Congressional amendments to section 402 of the Federal Lands Policy and Management Act (43 U.S.C. § 1752) in Public Law 133-291. The BLM should ensure that any new regulations provide the public with the opportunity to participate in grazing management decisions on public lands, including by giving notice of all grazing permit decisions, ensuring the public has the opportunity to analyze and comment on proposed actions, as well as ensuring completion of environmental analyses in a timely fashion.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keck	John E.			1482	2	Federal Land Policy and Management Act (FLPMA)	The Managed Value of Historical , FLMPA , Sec. 102.8, must be applied to the rewrite of the grazing standards. It is clearly evident ranchers have been targeted through bias and contempt, but the historical operations they continue to manage have been in existence for well over a century (longer than that in the New Mexico major river drainages and certainly since 1880 elsewhere). Regardless of any bias, those entities have significant historical status and must be treated as such.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Sandra	Montana Grass Conservation Commission	MT	1386	4	Federal Land Policy and Management Act (FLPMA)	Multiple Uses: In order to meet the terms of the BLM's multiple-use mandate, a distinction must be made between forage made available for domestic livestock use and other purposes such as wildlife. The "carrying capacity" needs a better definition to separate wildlife and domestic livestock use. This will account fairly for livestock use and not penalize the permittee for wildlife concentrations that cannot be controlled as domestic livestock can be.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keck	John E.			1482	1	Federal Land Policy and Management Act (FLPMA)	FLMPA mandates matters such as Law Enforcement to include proper federal officials and local alternatives, Sec. 303 (2) along with d) state officials for regulatory and enforcement matters. As such the whole section of impounds and related regulatory demands must and can be done through local and state relationships. These matters need to be dropped from the grazing guidelines in their entirety.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	26	Federal Land Policy and Management Act (FLPMA)	BLM has established a policy that allocates up to 50% of the forage produced for livestock grazing. This policy fails to meet the requirements described in FLPMA. The regulations need to be revised to ensure that lands available for grazing have a thorough analysis as part of the planning process to establish stocking numbers consistent with a carrying capacity that ensure degraded habitat recovery and ecological standards are met.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klein	Tammy	Central Valley and Penasco Soil and Water Conservation Districts	NM	1144	6	Federal Land Policy and Management Act (FLPMA)	43 CFR 1600 does not reflect the intent of Congress as stated in FLPMA . FLPMA is the only legal authority for a BLM land use process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Duncan	Dan		NV	919	4	Federal Land Policy and Management Act (FLPMA)	4.Our allotment was declared by the BLM a horse free allotment many years ago. The BLM needs to do their job in keeping it that way by removing all the horses and burros. If the BLM managed the wild horses and burros better across the west, it would make for a much healthier ecosystem.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Frank		ID	1281	4	Federal Land Policy and Management Act (FLPMA)	- Please address multiple use as required by law as you develop these revised regulations. None of the multiple uses need exclusive use of the land. Instead, a role of the federal government is to work with the various users on a shared use approach that is sustainable.
Other Laws								

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loper	Dick	WSGB		1169	48	Other Laws	The WSGB comments that the BLM Grazing Regulations should NOT contain direction on issues relating to the National Historic Preservation Act. Elements of this Act should NOT be included as terms and conditions in a Section 3 Grazing permit. State Governments have many responsibilities with respect to historic areas within their respective States and the WSGB comments that the BLM Grazing program is an inappropriate location for this subject, and would be an infringement on, the role of State Government on this subject. The WSGB comments that the BLM grazing program already has enough to do without adding this subject to the work load of the local BLM range staff.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	DeSoto	Randi	Summit Lake Paiute Tribe	NV	883	3	Other Laws	the current BLM proposed revisions closely resemble those attempted in 2006 which were found to be in violation of multiple Federal Acts during multiple legal hearings. Therefore, the current BLM proposal should not be further considered, as it too is likely to be in violation of the Endangered Species Act
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	6	Other Laws	Some of the key issues or objectives BLM is promoting in grazing management have failed to comply with data quality standards required under the Data Quality Act[10]. 10 BLM. 2018. Guidelines for Ensuring and Maximizing the Quality, Objectivity, Utility, and Integrity of Information Disseminated by the Bureau of Land Management. BLM's report that tabulated the total number of allotments meeting and not meeting rangeland health standards provides an example of failure to meet data quality standards. Up to 2015 BLM reported partial information on its assessments of those allotments to meet rangeland health standards.[11] The 2018 report, not available to the public, continues this practice[12]. The cessation of providing these data to the public constitutes a BLM failure to meet the utility and completeness for unbiased information as required under the Data Quality Act. 11 BLM. 2015. Range Inventory and Monitoring Evaluation Report, RIME Table 7 Standards for Rangeland Health - Source of all table data is field office records. 12 https://www.peer.org/wp-content/uploads/2020/03/3_4_20_2018_RIMEreport_Land_Health.pdf
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Terry	Otero County Cattleman's Association		1201	6	Other Laws	Proper livestock grazing is supported by peer-reviewed science-based research and literature to be one of the only ways to maintain the health of western rangelands and is a contributor to productive wildlife habitat. In the case, Public Lands Council vs Babbitt, the Court of Appeals, 167 F.3d, at 1307-1308, the court ruled that permits issued for conservation use were unlawful. The Supreme Court affirmed [PLC vs Babbitt (98-1991) 529 U.S. 728 (2000)]. Regulations must make this clear.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Pauline	Otero County Cattleman's Association		1201	6	Other Laws	Proper livestock grazing is supported by peer-reviewed science-based research and literature to be one of the only ways to maintain the health of western rangelands and is a contributor to productive wildlife habitat. In the case, Public Lands Council vs Babbitt, the Court of Appeals, 167 F.3d, at 1307-1308, the court ruled that permits issued for conservation use were unlawful. The Supreme Court affirmed [PLC vs Babbitt (98-1991) 529 U.S. 728 (2000)]. Regulations must make this clear.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stone	Gary	Otero County Cattleman's Association	NM	1201	6	Other Laws	Proper livestock grazing is supported by peer-reviewed science-based research and literature to be one of the only ways to maintain the health of western rangelands and is a contributor to productive wildlife habitat. In the case, Public Lands Council vs Babbitt, the Court of Appeals, 167 F.3d, at 1307-1308, the court ruled that permits issued for conservation use were unlawful. The Supreme Court affirmed [PLC vs Babbitt (98-1991) 529 U.S. 728 (2000)]. Regulations must make this clear.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	29	Other Laws	Compliance with Executive Orders-BLM grazing regulations should comply with the following Executive Orders: EO 13771 Reducing Regulation and Controlling Regulatory Costs; EO 13777 Enforcing The Regulatory Reform Agenda; EO 13790 Promoting Agriculture and Rural Prosperity in America; EO 13855 Promoting Active Management of America's Forests, Rangelands, and Other Federal Lands To Improve Conditions and Reduce Wildfire Risk. EO 13790 Promoting Agriculture and Rural Prosperity in America is especially pertinent to this EIS process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	15	Other Laws	Compliance with Executive Orders-BLM grazing regulations should comply with the following Executive Orders: EO 13771 Reducing Regulation and Controlling Regulatory Costs; EO 13777 Enforcing The Regulatory Reform Agenda; EO 13790 Promoting Agriculture and Rural Prosperity in America; EO 13855 Promoting Active Management of America's Forests, Rangelands, and Other Federal Lands To Improve Conditions and Reduce Wildfire Risk. EO 13790 Promoting Agriculture and Rural Prosperity in America is especially pertinent to this EIS process.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	15	Other Laws	BLM should not misunderstand their responsibilities under the multiple-use laws. The agency is not required to allow livestock grazing everywhere, nor everywhere they have historically or currently allowed grazing. The agency's highest priority is to meet the requirements of substantive requirements of the Clean Water Act and Endangered Species Act even if it means curtailing grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Pauline	Otero County Cattleman's Association		1201	1	Other Laws	any changes made to the present grazing regulations must adhere to the following Executive Orders: 13771 Reducing Regulation and Controlling Regulatory Costs 13777 Enforcing the Regulatory Reform Agenda 13790 Promoting Agriculture and Rural Prosperity in America 13855 Promoting Active Management of America's Forests, Rangelands, and Other Federal Lands to Improve Conditions and Reduce Wildfire Risk
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Terry	Otero County Cattleman's Association		1201	1	Other Laws	any changes made to the present grazing regulations must adhere to the following Executive Orders: 13771 Reducing Regulation and Controlling Regulatory Costs 13777 Enforcing the Regulatory Reform Agenda 13790 Promoting Agriculture and Rural Prosperity in America 13855 Promoting Active Management of America's Forests, Rangelands, and Other Federal Lands to Improve Conditions and Reduce Wildfire Risk
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stone	Gary	Otero County Cattleman's Association	NM	1201	1	Other Laws	any changes made to the present grazing regulations must adhere to the following Executive Orders: 13771 Reducing Regulation and Controlling Regulatory Costs 13777 Enforcing the Regulatory Reform Agenda 13790 Promoting Agriculture and Rural Prosperity in America 13855 Promoting Active Management of America's Forests, Rangelands, and Other Federal Lands to Improve Conditions and Reduce Wildfire Risk
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	2	Other Laws	There are several current Executive Orders, plus those from preceding administrations, which are applicable to the process. The most recent ones are Executive Orders 13771, 13777, 13790 and 13855.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	31	Other Laws	BLM must strengthen and expand its regulatory review and protections for historic properties and cultural sites on public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Rankin		NM	1179	5	Other Laws	Any changes made to the present grazing regulations are subject to the specifications laid out in the following Executive Orders: 13771 Reducing Regulation and Controlling Regulatory Costs https://www.whitehouse.gov/presidential-actions/presidential-executive-order-reducing-regulation-controlling-regulatory-costs/ 13777 Enforcing the Regulatory Reform Agenda https://www.federalregister.gov/documents/2017/03/01/2017-04107/enforcing-the-regulatory-reform-agenda 13790 Promoting Agriculture and Rural Prosperity in America https://www.whitehouse.gov/presidential-actions/presidential-executive-order-promoting-agriculture-rural-prosperity-america/ 13855 Promoting Active Management of America's Forests, Rangelands, and Other Federal Lands to Improve Conditions and Reduce Wildfire Risk https://www.whitehouse.gov/presidential-actions/eo-promoting-active-management-americas-forests-rangelands-federal-lands-improve-conditions-reduce-wildfire-risk/
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bradshaw	Charlie		WY	1379	7	Other Laws	We request the BLM not consider allotments to be eligible for "buyouts" as it is not an action that is legal. Permittees have requirements they have to meet and allowing non-ranching groups such as Western Watershed Project, wild horse groups, or Earth Justice (to name a few) to "purchase" an allotment and allowing the land to sit without management does not meet several acts (ie. FLPMA, NEPA, and NFMA to name a few).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Pauline	Otero County Cattleman's Association		1201	2	Other Laws	Preference was legally adjudicated to the qualified base property owned or controlled by the owner of the preference and as such, neither the Secretary of the Interior nor BLM officials have the legal authority to cancel a preference.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Robinson	John	Idaho Conservation League	ID	1341	10	Other Laws	Poorly placed water developments and salt blocks can concentrate livestock at cultural resource sites and lead to negative impacts to archaeological resources. The BLM is obligated under the Archaeological Resources Protection Act (ARPA) of 1979 and the American Antiquities Act of 1906 to protect and preserve the National Register of Historic Places (NRHP)-eligible cultural resources found on agency-managed lands. ICL suggests the BLM consult with Idaho State Historic Preservation Office (SHPO) to identify livestock management techniques that minimize impacts to cultural resources.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Pauline	Otero County Cattleman's Association		1201	4	Other Laws	Livestock grazing is permitted and paid for, whereas many of the other multiple-uses are not. Therefore, permittees/lessees must be included in the decision making process when related to grazing on their allotments and including, but not limited to, exchanges-of-use carrying capacity, crossing permits, designated recreation areas, mining, and mineral extraction. Section 8 of PRIA mandates that the Secretary 'shall' carefully consultate, cooperate, and coordinate, with the DOI-BLM-WO-WO2000-2019-0001-EIS, Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Revision of Grazing Regulations for Public Lands lessees, permittees, and landowners involved. Current regulations disregard meaningful consultation, cooperation, and coordination with grazing permittees and lessees.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stone	Gary	Otero County Cattleman’s Association	NM	1201	4	Other Laws	Livestock grazing is permitted and paid for, whereas many of the other multiple-uses are not. Therefore, permittees/lessees must be included in the decision making process when related to grazing on their allotments and including, but not limited to, exchanges-of-use carrying capacity, crossing permits, designated recreation areas, mining, and mineral extraction. Section 8 of PRIA mandates that the Secretary 'shall' carefully consultate, cooperate, and coordinate, with the DOI-BLM-WO-WO2000-2019-0001-EIS, Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Revision of Grazing Regulations for Public Lands lessees, permittees, and landowners involved. Current regulations disregard meaningful consultation, cooperation, and coordination with grazing permittees and lessees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Scarbrough	Gary	Otero County Public Land Use Advisory Council	NM	1202	3	Other Laws	Inclusion of the following Executive Orders to any changes made to the present grazing regulations could also streamline certain projects and/or requirements: 13771 Reducing Regulation and Controlling Regulatory Costs 13777 Enforcing the Regulatory Reform Agenda 13790 Promoting Agriculture and Rural Prosperity in America 13855 Promoting Active Management of America's Forests, Rangelands, and Other Federal Lands to Improve Conditions and Reduce Wildfire Risk
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	12	Other Laws	In sum, any change in the evaluation of Land Health Standards at a spatial or temporal scale will have to be considered in context of the BLM's existing commitments to evaluate land health at the allotment level; any failure to conform to the terms of the existing commitments could result in violations of the Endangered Species Act. It is unclear if evaluating rangeland health at the watershed or land use planning level would achieve the purpose of the commitments the BLM has made in numerous ESA-related documents.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frost	Vonda		NM	899	5	Other Laws	Any changes made to the present grazing regulations are subject to the specifications laid out in the following Executive Orders: 13771 Reducing Regulation and Controlling Regulatory Costs https://www.whitehouse.gov/presidential-actions/presidential-executive-order-reducing-regulation-controlling-regulatory-costs/ 13777 Enforcing the Regulatory Reform Agenda https://www.federalregister.gov/documents/2017/03/01/2017-04107/enforcing-the-regulatory-reform-agenda 13790 Promoting Agriculture and Rural Prosperity in America https://www.whitehouse.gov/presidential-actions/presidential-executive-order-promoting-agriculture-rural-prosperity-america/ 13855 Promoting Active Management of America's Forests, Rangelands, and Other Federal Lands to Improve Conditions and Reduce Wildfire Risk https://www.whitehouse.gov/presidential-actions/eo-promoting-active-management-americas-forests-rangelands-federal-lands-improve-conditions-reduce-wildfire-risk/
Consistency with Federal/State/Local Plans								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	59	Consistency with Federal/State/Local Plans	An obvious concern with this approach is that it overlooks the fact that many RMPs are decades old, are rarely if ever updated within the 15-20 year pledged planning timeframe, and are at a broad scale that is inadequate for a site-specific evaluation of rangeland health. If the BLM proposes to evaluate land health standards at the RMP level, it must in the EIS provide an accurate accounting of the current RMPs, projected (and realistic) revision dates, how shifting land health evaluations to the RMP process would be accomplished, and how timely site specific evaluations would be assured.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044		Consistency with Federal/State/Local Plans	both the Eureka County Code and the Eureka County Master Plan mandate "the involvement of Eureka County in the management of federal lands and in the development of criteria that are meaningful in any decision-making process, as contemplated by 43 C.F.R. Section 1610.3-1(a), Section 1610.3-1(b), Section 1620.3-2(a); 36 C.F.R. Ch. II, Section 219.7(a), Section 219.7(c), and Section 219.7(d)" and "Failure of federal entities to afford Eureka County complete notice and opportunity for involvement beyond that afforded individuals, or to limit State or County government involvement, input to or comment at public hearings is presumed to be prejudicial to the government of Eureka County and its residents, and that the Board of Eureka County Commissioners is authorized and empowered...to seek redress for such prejudice."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rector	Jeff	Board of County Commissioners of Rio Blanco County, CO	CO	987		Consistency with Federal/State/Local Plans	Below is the Livestock Grazing section of the LNRPP. We ask that the below policies are incorporated into the revised regulations. The information regarding the custom, culture and historical information is contained here to help provide context and understanding of how important this is in Rio Blanco County.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rector	Jeff	Board of County Commissioners of Rio Blanco County, CO	CO	987		Consistency with Federal/State/Local Plans	As required by the current National Environmental Policy Act, the Federal Land Policy and Management Act, the National Forest Management Act and other federal statutes, federal agencies are required to give meaningful consideration to policies asserted in plans developed by local governments. Succinctly stated, the primary reason for local governments to develop a Land Use Plan is to ensure the local socioeconomic wellbeing, the culture and customs of the constituents, and conservation of natural resources are considered in federal decisions. The BLM is required to consider the LNPP under NEPA and FLPMA. To review the LNRPP in its entirety, please visit: https://www.rbc.us/578/Natural-Resources and click the link to view the plan.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	27	Consistency with Federal/State/Local Plans	We strongly request that BLM take every effort to incorporate actions to bring most benefit to ranching families and local economies first before implementing any prohibitive or restrictive management action. This can be achieved by BLM reaching consistency with Eureka County's plans, policies, and codes as required by NEPA, FLPMA and the respective implementing regulations. Specifically, the Eureka County Code and the Eureka County Master Plan states the following regarding any grazing restrictions on federally administered lands in Eureka County: -Federal agencies in coordination with graziers must ensure that management decisions are based upon the best rangeland science, that flexibility is built into grazing permits to allow for adaptive management as issues and concerns arise, and that that quality and quantity of data collected can support all decisions made; -Before imposing grazing restrictions or seeking changes in livestock stocking rates or seasons of permitted use, federal agencies in coordination with graziers must identify and implement all economically and technically feasible livestock distribution, forage production enhancement, weed control programs, prescribed grazing systems, off-site water development by the water rights holder, shrub and pinyon/juniper control, livestock salting/supplementing plans, and establishment of riparian pastures and herding; -Federal agencies in coordination with graziers must assure that all grazing management actions and strategies fully consider impact on property rights of inholders and adjacent private landowners and consider the potential impacts of such actions on grazing animal health and productivity. -We oppose and protest any efforts by the BLM to implement unjustified and arbitrary grazing restrictions, including "hot season" grazing restrictions, on any grazing allotments within or adjacent to Eureka County.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	4	Consistency with Federal/State/Local Plans	We do request very close coordination and consistency with our local plans, policies, and proposals to the maximum extent (in accordance with 43 CFR 46.225(e)), 40 CFR 1501.2, 40 CFR 1501.7(a)(1), 40 CFR 1506.2(d), among other regulation and guidance). Additionally, the NEPA regulations and guidance, specifically 40 CFR 1502.16(c) and 1506.2(d) and the March 16, 1981 "Memorandum for Federal NEPA Liaisons, Federal, State, and Local Official and Other Persons Involved in the NEPA Process," Questions 23b and 23c, mandate that EISs are to "include discussions of...possible conflicts between the proposed action and the objectives of...local land use plans, policies and controls for the area concerned" and "discuss any inconsistency of a proposed action with any approved State or local plan and laws (whether or not federally sanctioned). Where an inconsistency exists, the statement should describe the extent to which the agency would reconcile its proposed action with the plan or law." These NEPA requirements cannot be met if BLM fails to properly coordinate with Eureka County in the process to include this comprehensive analysis in the EIS.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	15	Consistency with Federal/State/Local Plans	Water Rights: Should be held by permittees as they "make beneficial use of the water" as required in Idaho Water Law.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	26	Consistency with Federal/State/Local Plans	The rules should require that outdated RMPs be updated before grazing can be reauthorized. In many cases, the NEPA analysis for applicable RMPs are no longer current and adequate to support proposed grazing decisions. The agency cannot tier to that document because things have changed significantly, such as climate change and forest health concerns which are now paramount and were not addressed in that plan.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	30	Consistency with Federal/State/Local Plans	Specifically, the Eureka County Code and the Eureka County Master Plan states the following regarding any grazing restrictions on federally administered lands in Eureka County: * Federal agencies in coordination with graziers must ensure that management decisions are based upon the best rangeland science, that flexibility is built into grazing permits to allow for adaptive management as issues and concerns arise, and that that quality and quantity of data collected can support all decisions made; * Before imposing grazing restrictions or seeking changes in livestock stocking rates or seasons of permitted use, federal agencies in coordination with graziers must identify and implement all economically and technically feasible livestock distribution, forage production enhancement, weed control programs, prescribed grazing systems, off-site water development by the water rights holder, shrub and pinyon/juniper control, livestock salting/supplementing plans, and establishment of riparian pastures and herding; * Federal agencies in coordination with graziers must assure that all grazing management actions and strategies fully consider impact on property rights of inholders and adjacent private landowners and consider the potential impacts of such actions on grazing animal health and productivity. * We oppose and protest any efforts by the BLM to implement unjustified and arbitrary grazing restrictions, including "hot season" grazing restrictions, on any grazing allotments within or adjacent to Eureka County.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	13	Consistency with Federal/State/Local Plans	If the BLM's 2020 revisions weaken or alter the requirements of the land health evaluation process either spatially or temporally, the application of the sage-grouse plan amendments is even further inadequate to protect the bird. The agency must analyze and disclose how its proposed grazing regulations revisions would affect the existing land use plans and amendments in context of the pledges the agency has made. ^{29 29} We note here that our concerns about the implementation of the sage-grouse plan amendments with regard to livestock grazing should not be construed as endorsement of either the 2015 or 2019 plans' sufficiency to adequately protect the birds against grazing impacts.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hendrickson	Callie		CO	1116	1	Consistency with Federal/State/Local Plans	he BLM is required to consider the local plan and policies under NEPA and FLPMA. Please view the LNRPP or visit the Districts' website at www.whiterivercd.com to review the entire Land Use Plan. Please review Section 2 on page 3 regarding the Planning Process and Legal Framework. Below is the Livestock Grazing section of the LNRPP. We ask that the below policies are incorporated into the revised regulations. We provide the custom, culture and historical information prior to the policies to help provide context and understanding of how important this is to our community who depends upon the public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry and Diane		MT	960	4	Consistency with Federal/State/Local Plans	BLM plans need to consider local land use plans and input. Personally, we were involved with a Sage Grouse RMP amendment, going to meetings and making comments for 2 years. When the draft came back from Washington D.C., many changes such as 7-inch stubble height and Sage Brush Focal areas had been included. Putting that much time, energy, and cooperation into a project that ended with changes that were detrimental to our operation was disheartening to say the least.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Watkins	Ross	Uintah County	UT	1148	9	Consistency with Federal/State/Local Plans	Land Use Policy 13.3.9- Support valid existing transportation, mineral, and grazing privileges in the subject lands at the highest reasonably sustainable levels. Livestock and Grazing 15.4.3- "Manage lands to maintain or increase forage allocation for livestock grazing. Require annual checking and verification that lands are still up to standard." 15.4.6- "Public land agencies should properly notify permit-holders of any changes to their permits." It is also the opinion of the county that the BLM should strive to notify permit-holders of activities that occur on their allotments. There should be system in place that allows staff to efficiently notify grazers any time there is a planned activity, trail, right-of-way adjustment, fence realignment, etc. on their allotment. Several months ago the BLM requested to build a fence within the county's road ROW, and it came to the county's attention that this fence would prevent a permit holder from accessing significant acres of his allotment. This permit-holder was not notified of the planned fence. Situations such as these should not happen to permit-holders. The grazing community should be notified before a planned project takes place within their allotments so they can have a say in the planning process, and so they can plan for changes to their grazing patterns. 15.4.17- "The county recognizes grazing permits on public lands as an asset, which may be transferred by the permit owner. Such transactions must be processed by the land management agency promptly after proper notification. Any reduction in the size of the permit or forage allocation as a result of the transaction shall not be made without a specific scientific justification." 15.4.18- "When grazing permits are withdrawn from a livestock operator because of grazing violations, the permit should not be reallocated to other uses and should be made available for continued livestock use as soon as possible." 15.4.18- "Motorized access to public rangeland is vital to the permit holders and the land management agency for planning, management, and development. Motorized access should be maintained as open and improved as management needs require. Valid existing rights should be maintained."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schenbeck	Greg	The Wildlife Society	NE	1485	2	Consistency with Federal/State/Local Plans	SDTWS requests that the EIS disclose the impacts of these regulatory changes on the ability of BLM to effectively implement the vegetation, wildlife habitat, and livestock grazing management provisions in the SD RMP during allotment management planning and renewal of grazing permits and leases. We request that the EIS address how changes will impact the ecological services that these public lands provide. More specifically, we recommend that the impacts be described in terms of the extent and manner in which the regulatory changes will affect plan implementation and the ability of BLM to effectively coordinate and use livestock grazing management as a tool to meet rangeland health, wildlife habitat and other resource objectives and standards.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Aten	Melany	Paradise Sonoma Conservation District	NV	1334	3	Consistency with Federal/State/Local Plans	Revisions to the regulations should not only be consistent with the laws and regulations cited, but also with county and state management plans and regulations. Lack of consideration of local and state plans and regulations will only exasperate the distrust that occurs all too often amongst the federal management agencies and local governments.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoagland	Jerry L.	Owyhee County Board of Commissioners	ID	1490	12	Consistency with Federal/State/Local Plans	Idaho has 8 Standards and in each case the Idaho BLM attempts of identify other data or specific information directly relevant to each of the 8 standards. However, the two primary protocols (IIRH and PFC) will adequately assess the threshold of range health for the relevant standards in the vast majority of cases. By contrast other States have only 2, 3 or up to 5 standard. Where a permit renewal effort must define and attempt to defend a determination related to each applicable Idaho standard the paper work and time involved become immediately excessive and wasteful. Thus the prediction for 35 years to process a permit renewal becomes a self-propagating reality.
Climate and Meteorology								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	17	Climate and Meteorology	The rules should recognize that ecosystems will store more carbon and help mitigate climate change if they remain ungrazed. The agency needs to help mitigate climate change by managing all living systems to capture and storage optimal levels of carbon. Livestock grazing reduces carbon storage in vegetation and soil at an ecosystem scale and grazing must be reduced to help mitigate climate change.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Parry	Ronald		NM	815	1	Climate and Meteorology	The arid lands of the Southwest are increasingly under threat from climate change. Under these circumstances, any increase in the level of livestock grazing on publuc lands is completely contrary to the future preservation of these lands in something approximating a natural condition. Therefore, I am totally opposed to the new grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cascade	Robyn	Great Old Broads for Wilderness; Northern San Juan chapter	CO	1102	6	Climate and Meteorology	Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heard	Tom		TX	969	2	Climate and Meteorology	Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	4	Climate and Meteorology	Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	17	Climate and Meteorology	Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spotts	Richard		UT	1235	7	Climate and Meteorology	Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	LeBold	Charles		OR	782	2	Climate and Meteorology	potential impacts from climate change a top priority in all proposed changes. ranges are stressed by noxious weeds, wildland fire, motorized vehicle use etc.. restoration priority equal to providing grazing AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	8	Climate and Meteorology	Particularly crucial are actions that will have long-term impacts over large areas and actions that will result in an increase in greenhouse gas emissions and will thus contribute to planet warming. In support of evaluating impacts on climate change, we cite the National Audubon Study, Survival By Degrees (www.audubon.org/survivalbydegrees) which found that 389 native species out of the 604 breeding in North America would be at risk of extinction from a rise in global temperatures. It's critical to include an analysis of impacts on climate change in BLM documents.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	18	Climate and Meteorology	Helen Harwatt, William J Ripple, Abhishek Chaudhary, Matthew G Betts, Matthew N Hayek. 2019. Scientists call for renewed Paris pledges to transform agriculture. The Lancet. Open Access. Published: December 11, 2019 DOI: https://doi.org/10.1016/S2542-5196(19)30245-1 https://www.thelancet.com/action/showPdf?pii=S2542-5196%2819%2930245-1 .
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	28	Climate and Meteorology	Dust produced from windblown soils lands on snow and causes earlier site melting exacerbating the adverse effects of climate change.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vanderryn	Judith		CO	1423	4	Climate and Meteorology	any change in proposed regulations or management practices need to be considered in light of the increasing crisis of global climate change. Any number of scientific studies have shown that soils are important in carbon sequestration. Grazing should be scientifically managed for long-term benefit of our planet and future generations of all citizens, not simply those who will earn a short-term profit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Erma		NY	113	4	Climate and Meteorology	Require grazing management to improve carbon sequestration in soils and analyze grazing in context of the climate crisis.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schenk	Sherry		CO	1406	3	Climate and Meteorology	Another issue is that the impacts being seen on public lands from climate change seem to be ignored in the proposal. Continual warming temperatures and decreased yearly precipitation will lower the carrying capacity of allotments. Carrying Capacity is based on a 10 year average forage production. The past decade has been hotter and dryer than records for previous years and carrying capacity levels need to be adjusted for the resultant decrease in forage.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	6	Climate and Meteorology	A. The proposed regulation should take into account the climate impacts of grazing by conducting a quantitative analysis of any proposed emissions of atmospheric gasses.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	8	Climate and Meteorology	The Secretary of Interior rescinded all consideration of climate change in landscape level planning (Sec Order 3360, January 5, 2018). We find this incredibly irresponsible. The failure of BLM to acknowledge that climate change exists and will change the future means that BLM will fail to adapt to landscape level changes in native plant communities and riparian areas and aquatic habitats. That means that BLM will fail to develop or describe best management practices, or any adaptive management, monitoring, and mitigation for resources that either contribute to or will be affected by climate change. We add that while Secretarial Order 3360 has rescinded U.S. Department of Interior and BLM climate change policies, the Department and the BLM are still required to take a hard look at climate change under NEPA-both in terms of its effects on resources under BLM management and in terms of effects from BLM-managed activities
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ruch	Jeff	PEER		1131	2	Climate and Meteorology	PEER urges that all BLM eco-planning include assessments of grazing climate impacts, as required under the National Environmental Policy Act. Further, BLM should adopt regulations that BLM will mitigate adverse climate effects and promote climate-resilient lands in its grazing program.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	7	Climate and Meteorology	In line with this assessment, the BLM should include in the upcoming EIS an analysis of climate change impacts of the proposed regulations. Similar analyses should be carried out when considering a proposed grazing allotment, as well as on existing permits as they come up for renewal. This analysis should include a quantitative assessment of the grazing allotment's net contribution to atmospheric carbon dioxide and methane. The BLM should incorporate carbon sequestration analysis as well, factoring in the amount of carbon sequestration lost due to the additional grazing of carbon-rich grasses on public lands. The BLM should draw upon existing resources for conducting such analysis, including the U.S. Geological Survey LandCarbon initiative to inform its analysis of climate impacts. ^{11 11} LANDCARBON, U.S. GEOLOGICAL SURVEY, https://www.usgs.gov/mission-areas/landresources/science/landcarbon?qt-science_center_objects=0#qt-science_center_objects .

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Healow	Linda		MT	1099	1	Climate and Meteorology	I'm concerned that in BLM plans, there has been little mention of climate change and its impact on grazing lands. I live in Montana where a current climate assessment is available. I have attached that for reference.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	bowers	sheila		CA	12	1	Climate and Meteorology	I should be clear that I think it is outrageous that livestock grazing is allowed on any public lands, essentially privatizing them for someone's personal profit at the expense of all Americans, so trying to expand that lousy use of public lands is unacceptable to me. It is well known that reducing the raising of livestock is one of the most critical and simple ways to vastly reduce GHG emissions so by supporting increased livestock, you are directly causing Climate Change and using our land to do it.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	17	Climate and Meteorology	Given the overwhelming scientific information on climate change stress impacts now underway and foreseeable across western public lands, this analysis must fully consider how hotter temperatures, less precipitation falling as snow (and hence earlier snowmelt and runoff and longer snow-free periods), more extreme weather events such as drought or weather whiplash, will have on any hoped for outcomes of this project. This must be fully assessed along with the role of livestock grazing and the grazing that will take place under the revisions, on further degrading increasingly less resilient lands. Proposed grazing to be imposed will further slow or preclude any native or crust recovery. The project's TG and other grazing inundation of significant areas where concentrated grazing/trampling/browse will be imposed will result in new and even worse weeds invading, and flammable weed expansion outward across the surrounding landscape-with worse fires, weeds and non-native species dominance highly likely.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	7	Climate and Meteorology	Climate change is already causing changes to native habitats and plant and animal populations. Larger, more frequent wildfires have impacted native vegetation in the western United States in recent years. In 2017 alone, more than 10 million acres burned across the United States, well above the normal average. The greatest acreage burned in 2017 was located in the Great Basin area, with over 2.1 million acres burned (National Interagency Fire Center 2017; Hoover and Hanson 2019). The 2015 Western Watersheds Project concluded that "Public lands ranching is the most widespread commercial use of public lands in the United States. Ranching is one of the primary causes of native species endangerment in the American West; it is also the most significant cause of non-point source water pollution and desertification. Public lands ranching significantly contributes to climate change by emissions of the global warming gases nitrous oxide and methane; it causes loss of soil carbon reserves by causing erosion and by substantially reducing the landscape's potential to sequester carbon" (Eckhoff 2015).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nagel	Clinton	Gallatin Wildlife Association	MT	949	5	Climate and Meteorology	5. climate change. The changing climate must be acknowledged and taken into account. In order to do that, BLM needs to look at the value of restoring a healthy biodiversity to the natural landscape. This includes restoring healthy riparian habitat, natural vegetation that can grow and provide nutrients and preserve the biocrust. This is more critical to recreating a healthy landscape than worrying about fire, whereby BLM then allows grazing to lay natural vegetation short, stubby, barren and dry. In other words, BLM should analyze how grazing management can improve carbon sequestration in the soil.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	17	Climate and Meteorology	5) The grazing regulations must require livestock grazing management to improve carbon sequestration in soils, and analyze grazing in the full context of climate change, both in terms of the contribution of livestock grazing and management to climate change as well as the consequences to other natural resources including but not limited to impacts to riparian areas, springs, seeps and other aquatic habitats.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	6	Climate and Meteorology	2) Climate change. BLM needs to incorporate climate change in all analyses and decisions both in terms of the contribution from livestock grazing to methane emissions and climate changes, as well as the consequences and impacts to other natural resources by a warming and drying climate with more extreme events. Climate Change is arguably the most critical reasonably foreseeable future action that will affect BLM-managed public lands in the decades to come. Climate change is causing changes and declines in native habitats and plant and animal populations. Livestock grazing is one of the larger contributions to carbon dioxide in the atmosphere, further exacerbating climate change. Ripple et al. (2014) stated that "Livestock production [also] contributes directly and indirectly to greenhouse gases, raising increasing concern about its climate effects."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Glasenapp	Logan	New Mexico Wilderness Alliance	NM	1040	6	Climate and Meteorology	BLM should require consideration of climate change during grazing permit decisions. The present effects being felt from climate change should lead to a reduction in the number of animals on the landscape due to water scarcity and vegetation loss. The future threats of untethered climate change, however, must also be considered since livestock are accountable for such an alarming percentage of greenhouse gas emissions. Unmitigated grazing use of our public lands will only contribute to the worsening and alarming trend of warming temperatures, extreme weather, and diminishing resources.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	6	Climate and Meteorology	Finally, since BLM is directed to revisit which lands are available for grazing in its resource management plans [6: Bureau of Land Management BLM Handbook 1601-1, Appendix C, II, B and 43 U.S. Code §§1752(c)(1), 1712, and?1711.], the BLM should also disclose for all of its RMPs when the availability analysis was last conducted and whether climate change was considered in the analysis.
Renewable Energy								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Knapp	Gregory		CO	1055	4	Renewable Energy	Comment 3 - Grazing Regulation Updates Should Address the Environmental Impacts of the Supported Cattle Industry The 2.4 million acre-feet of water used by the Upper Basin states to grow hay each year is now 22% of the Colorado River flow. If that water flowed to the Glen Canyon and Hoover Dam hydroelectric power plants it would produce electricity - a lot of electricity. At Glen Canyon Dam it would generate 1.1 million megawatt-hours. At Hoover Dam, it would generate another 1.1 million megawatt-hours. That's a total of 2.2 million mega- watt hours (BOR https://water.usbr.gov/query.php . Another way to look at it, that power, if generated at a coal fired plant, would require 4.1 million short tons of coal creating 12.3 million short tons (11.2 million metric tons) of CO2 emissions. Or if generated at a natural gas fired power plant, it would require 27,600 million cubic feet of natural gas creating 1.66 million short tons (1.5 million metric tons) of CO2 emissions (EIA, 2018 and USEPA AP-42 C01S01). The resulting power can provide a year of electricity for 210,000 homes (https://www.eia.gov/tools/faqs).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Knapp	Gregory		CO	1055	3	Renewable Energy	Comment 3 - Grazing Regulation Updates Should Address the Environmental Impacts of the Supported Cattle Industry The 2.4 million acre-feet of water used by the Upper Basin states to grow hay each year is now 22% of the Colorado River flow. If that water flowed to the Glen Canyon and Hoover Dam hydroelectric power plants it would produce electricity - a lot of electricity. At Glen Canyon Dam it would generate 1.1 million megawatt-hours. At Hoover Dam, it would generate another 1.1 million megawatt-hours. That's a total of 2.2 million mega- watt hours (BOR https://water.usbr.gov/query.php . Another way to look at it, that power, if generated at a coal fired plant, would require 4.1 million short tons of coal creating 12.3 million short tons (11.2 million metric tons) of CO2 emissions. Or if generated at a natural gas fired power plant, it would require 27,600 million cubic feet of natural gas creating 1.66 million short tons (1.5 million metric tons) of CO2 emissions (EIA, 2018 and USEPA AP-42 C01S01). The resulting power can provide a year of electricity for 210,000 homes (https://www.eia.gov/tools/faqs).
Petroleum Resources								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Gene		UT	806	3	Petroleum Resources	Monitor and Control Oil and Gas Activities A. Oil and Gas production has exploded on our Permit. Locations, new and expanded roads and pipelines have encroached on our AUM’s. Over the last 5-8 years 25+/- locations have been established with another 27 that have been permitted by the BLM. No acknowledgement of loss to the permittee is addressed. B. Monitoring of reseeding at appropriate times of year and control of noxious weeds should be considered.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	May	Melissa	San Juan Soil & Water Conservation District	NM	839	2	Petroleum Resources	Grazing permits should also take into account other surface uses that may reduce forage availability or otherwise negatively impact grazing. For example, in the San Juan Basin, road networks and well pads used for oil and gas activity are frequently not kept up to Gold Book Standards or held to reclamation requirements. This impacts forage potential by reducing the acreage available (ie: when well pads maintain a large footprint instead of being reclaimed to a teardrop shape) and disrupting natural drainage patterns that would otherwise have had diffuse sheet flow across a slope and now are concentrated in road drainage ditches and culverts.
Soil Resources								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paulton	Bill		SD	796	3	Soil Resources	The SCIENCE OF RANGELAND MANAGEMENT calls for cattle (or buffalo) to graze and tromp the land in order to break up the cryptobiotic crust which, if left untouched, encroaches upon and kills the grass and also keeps water from seeping into the ground. (This true science is the exact opposite of what bureaucrats say. A perfect example is Canyonlands. Signs warn not to step off the path. Do not disturb the cryptobiotic crust. Now with each passing year, there is less and less grass, and more and more gravel and sand. It is happening right before their eyes but they can't see it.)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	22	Soil Resources	The rules should protect and restore biotic soil crusts that help prevent erosion, fix nitrogen, cycle nutrients, and increase site productivity. Livestock grazing conflicts with the maintenance and recovery of biotic soil crusts.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Johnson	PhilipB		WY	771	2	Soil Resources	The real measure of long term grazing sustainabilty is soil condition, soil nutrients, organic matter, soil organisms, and soil erosion patterns. If your soil conditions are declining then grazing is not sustainable in the long run. Periodic soil testing and evaluation should get more emphasis on federal allotments to inform grazing decisions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kofler	Roger		OR	174	2	Soil Resources	The degradation of native plants and ground covers leaves the land open to erosion.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	11	Soil Resources	BSCs are vulnerable to trampling by domestic livestock and disturbance from vehicles and other human activities. When the crusty soil layer is disturbed, soil erosion and dust generation increase and moisture retention declines, increasing the likelihood of exotic plant invasion and decline of native perennials. The liberated dust can travel significant distances to mountain snowpacks where it darkens snowpack and accelerates snowmelt (Meyer, 2011; Neff et al. 2008).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	25	Soil Resources	Living soil crusts in arid lands stabilize soils, protect them from erosion, sequester carbon dioxide and are a frontline defense against cheatgrass and other invasive species. See other research info: Beymer et al 1992. Harmful effects of cattle grazing on microbiotic crusts. The project's clearing trees gives cows access to previously ungrazable sites with crusts that have been protected by tree limbs. Such sites are very often 100% covered by mosses, lichens and native grasses. The high level of grazing use and veg treatments across this landscape will strip this protective cover, and greatly increase watershed erosion and bare soil areas for weed colonization. Bowker et al. 2008. Crusts serve as soil function indicators. Yet the project ignores and completely sacrifices crusts -exposing sites to even more intensive cow impacts such as weed-causing soil/crust trampling, deposition of weed-causing manure, cows eating and beating down plants protecting crusts. Bortherson et al. 1984. This describes adverse effects of long-term livestock grazing on crusts. Concostrino-Zubiri et al. describe effects of exposure and livestock grazing on crusts - example Bryophytes (mosses). Deines et al. 2007. Lichen cover resulted in significant decreases in cheatgrass. Livestock trampling tears apart and/or pulverizes crusts. Evans and Belnap 1999. Effects of loss of nitrogen from crust lost in soils in arid communities. Fernandez et al. 2007. Results show that areas used by domestic livestock have 20% less plant cover and 100% less soil organic carbon and nitrogen compared to relict sites browsed by native ungulates. In actively grazed sites, domestic livestock grazing also appears to lead to clustered, rather than random, spatial distribution of soil resources. Kettering 2009. Soil crusts were not totally recovered from disturbance following 40 years. This also impacts crusts carbon sequestration ability. NRCS 2007. This describes microbiotic crusts and disturbance impacts. Ponzetti and McCune 2007. This describes adverse effects of soil disturbance and increased incident radiation, increased heat load, and topographic position in crust recovery. Rosentreter et al. Field Guide. Lichens and mosses typical of the region. Which species have been found, and where, in the project area and surroundings? Serpe et al. crusts. 2008. Crusts tend to reduce the spread of invasive species. The project will harm and/or destroy or lead to greater cow-caused destruction of crusts. USDI BLM Belnap et al. 2001. Tech. Ref. on Biological Crusts. Describes grazing and mechanical impacts to crusts, and their vital role in the ecosystem protecting soils from erosion in wind and water and other ecological functions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	24	Soil Resources	A new study by Root et al. 2019 highlights the tremendous role crusts play in protecting lands from invasive flammable weeds. TG and the changes in the proposed grazing Regs and BLM's Fuelbreak scheme all will EXPAND significant harm to crusts. BLM fails to apply measurable use standards for livestock trampling to upland communities - yet they are desperately needed to protect crusts.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Robinson	John	Idaho Conservation League	ID	1341	7	Soil Resources	While pipelines, reservoirs and water troughs can reduce impacts to riparian areas, if grazing is not properly managed these developments can lead to adverse impacts to uplands where vegetation and soils recover from grazing pressure much more slowly. In addition, constructing new pipelines may lead to increased soil disturbance, noxious weed establishment, and degradation of spring areas that are needed for sensitive species such as sage-grouse. The BLM should take this opportunity to reevaluate the design placement for all existing troughs, reservoirs and pipelines.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	27	Soil Resources	The TG, OBG lacking annual protective standards of use that serve to enable detection of land degradation and prevent undue degradation), extreme flexibility, streamlining and other elements of this proposal plus the Fuelbreaks and other BLM veg treatments (chaining, mastication, burning, herbiciding to kill native and non-native species etc.) are likely to take portions of public lands back to the days before the passage of the Taylor Grazing Act - causing extreme damage to soils, loss of topsoil and thus site potential,accelerated soil erosion in wind and water, soil compaction, and damage and destruction of soil-protecting microbiotic crusts - worsening flammable weed infestation risk.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	May	Melissa	San Juan Soil & Water Conservation District	NM	839	1	Soil Resources	Ranchers in our area have observed that proper rotational grazing can improve range conditions and soil health on Federal lands, both BLM and Forest Service. Grazing permits should allow users the flexibility to make these active management decisions in a timely manner.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	12	Soil Resources	Livestock grazing can degrade and compact soils, reduce infiltration, deplete soil nutrients and accelerate erosion (Lacy 2001). This can be especially damaging, given that rates of soil formation differ greatly depending on the various soil-forming factors, and may vary from anywhere between half a century to thousands or even tens of thousands of years (Buol et al. 2011). Thus, where a soil is significantly eroded or otherwise degraded, it may require a tremendous amount of time to return to a fully developed and "functional" state. The BLM must analyze and ensure that any proposed grazing rules consider soil integrity (including impacts to biological soil crusts and soil carbon storage) and avoid degrading soil integrity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Jen			1241	1	Soil Resources	I am especially concerned about desertification. Much of the desert Southwest is covered with cryptobiotic soil, which as you know, is an extremely important part of the ecosystem. I routinely observe massive damage done by cows. This damage will last for decades and cause great harm.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Collins	Kathleen		CO	765	2	Soil Resources	Disturbed soil can also become degraded, leading to less groundcover, causing a much greater impact than invasive species. Insufficient groundcover allows an increase in soil erosion, at a minimum.
Water Resources								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ahlgren	Larry	Williams Coulee Grazing District	MT	961	3	Water Resources	Water is an issue on many allotments. Traditional stock ponds in rougher terrain have silted in over the years. Due to more precipitation since 2011, ponds in heavier soils have become saline/salty to the point that neither livestock nor wildlife can use them. Producers have put in wells and waterlines over the years but will not put tanks watered from private sources on BLM lands due to the BLM placing a water rite on the private source. If this was not a stipulation, then producers would put in water on BLM lands for better distribution and use. Some District members have not had full use of their allotments for 6 years because of lack of water. BLM needs to consider changing policy or drilling wells for water pipelines.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	29	Water Resources	This Reg change scheme will also degrade drainage networks and riparian systems - more intensive erosion, gullyng, sediment production water pollution (erode soils, wash away copious amounts of livestock waste, excessive nutrients cause algal blooms, decrease sustainable perennial flows, expand aquatic species habitat loss including of habitats for numerous ESA-listed species, and further degraded many systems with TMDL requirements.. Belsky et al. 1999 riparian paper.).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	11	Water Resources	The regulations should include specific directives to achieve water quality standards as rapidly as possible-including removal of cattle from damaged stream and riparian areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hutchinson	Howard	Coalition of Arizona/New Mexico Counties	NM	1109	3	Water Resources	Recognition of private water rights on BLM lands particularly where allotments were adjudicated based on availability water;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	26	Water Resources	Please ensure that priority is placed on development and distribution of water and also placement of supplement. Please also allow supplement use to be placed, in some circumstances, near water sources. This is important because many grazing permits have current terms and conditions prohibiting placement of salt or supplement within a certain distance of water. In outcome based grazing strategies, placement of salt and supplement very near water is often necessary to keep cattle at desired locations and to ensure animal health and productivity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Renwick	Beth		MD	552	1	Water Resources	Environmentally, we know that cattle "poop" pollutes streams and any other water that is around. Fresh water is too scarce these days to allow cattle to just be in or near it at their heart's desire.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	18	Water Resources	Ensure that riparian ecosystems in grazed areas are maintained in healthy condition, including by the installation of Beaver Dam Analogs (BDAs).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	10	Water Resources	BLM should analyze and adopt regulations that ensure grazing management protects and improves, not degrades, water availability, quality, and quantity, including as habitat for native species, and with consideration of current and future climate change effects on western landscapes.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	45	Water Resources	Note that intensified grazing harms drainage networks and watersheds, and the full range of harms - direct, indirect and cumulative from the project on these resources must be fully assessed. See also Belsky et al. 1999 riparian grazing impacts paper.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baumann	Jim	Nevada State Grazing Board District N-6	NV	986	7	Water Resources	The ability to implement range improvement projects, especially water developments should be streamlined through the regulations. Priority should be given to the development and distribution of water, as it is essential to the success of any grazing strategy. The placement of salt and supplements near water, in some cases, is very important to keep cattle in desired locations and to ensure animal health and productivity. The strategic use and placement of supplements should be addressed, as many grazing permits have terms and conditions requiring the salt and supplements be placed a relatively long way from water sources.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Glasenapp	Logan	New Mexico Wilderness Alliance	NM	1040	5	Water Resources	In considering changes to its grazing regulations, BLM should consider adopting control mechanisms to limit the amount of fugitive dust. Dust layers on snowpack has been linked to unreliable melt, and therefore unreliable stream flows throughout the spring, summer, and fall. Grazing, both from vegetation loss and from physical movement of livestock, is a large contributor to fugitive dust and therefore, a large contributor to water insecurity. These consequences need to be contemplated when BLM is making decisions on grazing permits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Knapp	Gregory		CO	1055	2	Water Resources	Comment 2 - Grazing Regulation Updates Should Address the Significant Negative Impact the Supported Cattle Industry has on Western Water Supply, particularly the Colorado River Cattle graze on public lands in the West typically for about 4 months per year. In the Upper Colorado Basin, approximately 45% of the cattle inventory is held over its 8 1/2 non-grazing months. This maintenance requires some 2 million tons of alfalfa and grass hay. That 2 million tons of hay requires 2.4 million acre-feet of water annually from the Colorado River and its tributaries. Today, that represents 22% of the Colorado River flow. For a river that serves some 40 million people in the West, using 22% of its water to raise approximately 1 million cows, representing about 1% of local economies, and supplying <1% of US beef production, is an obvious disproportionate use of its water . The economies of the Colorado Plateau have changed and land use, i.e. grazing on public lands and water use must be re-evaluated as provided by FLPMA and the Multiple Use Sustained Yield Act. However, in no way, do these data imply that uses of these resources for these purposes should be wholly abolished. Rather, as Multiple Use explicitly guides us, judicious decisions can be made on their use in areas where it is warranted.
Lands with Wilderness Characteristics								

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	13	Lands with Wilderness Characteristics	Management of Lands with Wilderness Characteristics- Identification of Lands with Wilderness Characteristics is carried out as part of the planning process and as such is not subject to the grazing regulations under this section. I do not believe the identification of LWC's is authorized by the planning language in FLPMA. However, grazing management on lands designated as LWC's is regulated here. This section should include provisions to prohibit de-facto wilderness designation by managing LWC's to maintain wilderness characteristics. Such management goals can influence grazing decisions. Grazing decisions that are influenced by LWC designation should be expressly prohibited by these regulations. The Federal Lands Policy and Management Act that requires the inventory of federal lands also mandates that "the identification of such areas shall not, of itself, change or prevent change of the management or use of public lands". Section 4180- Section 4180 should be eliminated or completely rewritten.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Watkins	Ross	Uintah County	UT	1148	11	Lands with Wilderness Characteristics	15.4.23- "In summary, subject to the conditions and policies outlined in this report, the general rule of thumb on grazing management in wilderness should be that activities or facilities established prior to the date of an area's designation as wilderness should be allowed to remain in place and may be replaced when necessary for the permittee to properly administer the grazing program. Thus, if livestock grazing activities and facilities were established in an area at the time Congress determined that the area was suitable for wilderness and placed the specific area in the wilderness system, they should be allowed to continue. With respect to areas designated as wilderness prior to the date of the Act, these guidelines shall not be considered as a direction to reestablish uses where such uses have been discontinued." Wildlife 26.4.12- "Reduction in forage allocation resulting from forage studies, drought, or other natural disasters will be shared proportionately by wildlife, livestock, and other uses." 26.4.14- "Increases in forage allocation resulting from improved range conditions shall be shared proportionally by wildlife, livestock, and other uses."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casabonne	Mike		NM	1228	13	Lands with Wilderness Characteristics	Management of Lands with Wilderness Characteristics- Identification of Lands with Wilderness Characteristics is carried out as part of the planning process and as such is not subject to the grazing regulations under this section. I do not believe the identification of LWC's is authorized by the planning language in FLPMA. However, grazing management on lands designated as LWC's is regulated here. This section should include provisions to prohibit de-facto wilderness designation by managing LWC's to maintain wilderness characteristics. Such management goals can influence grazing decisions. Grazing decisions that are influenced by LWC designation should be expressly prohibited by these regulations. The Federal Lands Policy and Management Act that requires the inventory of federal lands also mandates that "the identification of such areas shall not, of itself, change or prevent change of the management or use of public lands".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cascade	Robyn	Great Old Broads for Wilderness; Northern San Juan chapter	CO	1102	5	Lands with Wilderness Characteristics	Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	30	Lands with Wilderness Characteristics	Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	8	Lands with Wilderness Characteristics	BLM should analyze and adopt regulations that ensure grazing management, including infrastructure development and vegetation management, preserves and improves, rather than degrades, lands with wilderness characteristics (as well as values such as roadlessness in areas beyond wilderness quality lands) in areas where BLM or the public has found such values to be present.
Fuels and Fire Management								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Daniels	Shannon		MI	22	1	Fuels and Fire Management	Unauthorized grazing – There is no positive correlation in the scientific literature that suggests grazing can achieve either outcome and a large body of evidence to the contrary, but it’s clear that this is an attempt to expedite these types of permits under the guise that it will benefit public lands. Grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Mark		NV	1390	2	Fuels and Fire Management	Reducing AUMs on an allotment may be the simplest short-term solution for the BLM regarding allotment concerns, but this is not a sustainable strategy for the environment, wildlife, livestock or the affected permittee(s). Not only has this strategy proved to be subjective due to the qualitative nature of this management practice, it is also rarely effective. Reducing the amount of grazing on an allotment leads to an increase in fire hazards by allowing vegetation to cure longer than it should, thus creating a landscape that is perfect for catastrophic wildfires. This in turn contributes to the spread of invasive species like cheatgrass and provides the perfect environment for pinyon- juniper encroachment that directly works against a nation-wide effort to increase greater sage-grouse habitat.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Whyde	Don		WY	870	1	Fuels and Fire Management	Your fact sheet suggests "fuel mangement projects need to be commensurate with the increased size of wildfires". That suggests to me widespread intensive grazing over a large area. Further, it suggests to me "Let's place as many livestock as we can on a land base and have the livestock eat everything." A novel way to reduce wildfire but a terrible procedure for heallthy rangelands. Maybe this might work on a specific small area but only if the BLM is intensively involved with establishing livestock numbers and grazing duration. Does the BLM have the staff to plan and then monitor these projects. I read each of your project examples that were initiated but there is no information on results-if initiated in 2017- two years is hardly enough time to evalutate efficacy.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	hill	paul		ID	772	1	Fuels and Fire Management	We live in Central Idaho where grazing is present on many acres of BLM and Forest service land and we know, from personal observation, that grazing actually increases wildfire risk as the copies left by cattle burn more readily, hotter and more intense than most natural vegetation. Local fire officials have told us repeatedly that once cowpies are alight it is extremely difficult to put them out and they continue to smolder setting up nre fire activity after an area has supposedly been put out.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoffman	Ted		ID	1021	3	Fuels and Fire Management	Vast areas of forest that were protected from fire for decades were suddenly allowed to burn because of the knee-jerk concept that “fire is natural”, with no consideration that the suppression management had created a vegetation that would burn so hot that many square miles of forest lands would be sterilized. Locations where trees or even brush and grass have not returned 20 years after the fire are not unusual.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paulton	Bill		SD	796	1	Fuels and Fire Management	TIMBER is a renewable resource. To maintain healthy forests, it must be harvested and thinned. The destruction of American forests through wildfire is uncalled for and results from poor management. Fire will not quickly move through harvested and thinned forests.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keys	Jennifer		VA	490	1	Fuels and Fire Management	There is no scientific evidence that grazing can reduce wildfire risks or improve rangeland conditions. To the contrary, there is substantial scientific data and literature that grazing is a significant cause of the spread of invasive species such as cheatgrass and increases the risk of larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dieterich	Michele		MT	235	1	Fuels and Fire Management	There is no evidence that grazing helps with fire risk. Exactly the opposite. Grazing brings in invasives and cheat grass which exacerbates fire. Grazing is far from the answer to fire. It is time to create fire-wise communities with protected and fire resistant homes. That is the only way to protect communities. Fire is a part of a natural ecosystem.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ratkovsky	Greg		CA	483	1	Fuels and Fire Management	There is no evidence nor is there much logic that these efforts will in fact reduce fires
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bibb	Martha		ID	886	1	Fuels and Fire Management	There is absolutely no scientific evidence to support that cattle grazing reduces fire. On the contrary grazing increasesthe spread of cheat grass, the early initiation of fire season, the rapid spread of fire through the cheat grass.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	21	Fuels and Fire Management	The rules should consider and avoid the effects of livestock grazing on fire regimes. Livestock grazing shifts the plant community composition from palatable grasses and forbs toward unpalatable conifers. This is contrary to current policy goals related to forest which urge us to avoid creating more ladder fuels. Livestock decrease the abundance of fine fuels which are necessary to carry periodic, low intensity surface fires. This reduces the frequency of fires, but increases their severity. See Kirsten Stade, MS, and Mark Salvo, JD. 2009. Ponderosa Pine in Peril: Assessing Public Lands Livestock Grazing in Ponderosa Pine Forests. Wild Earth Guardians. http://www.wildearthguardians.org/Portals/0/support_docs/report-ponderosa-pine-08-09.pdf ; Belsky, A.J., Blumenthal, D.M., "Effects of Livestock Grazing on Stand Dynamics and Soils in Upland Forest of the Interior West," Conservation Biology, 11(2), April 1997. http://web.archive.org/web/20030409094020/http://www.onda.org/library/papers/standdy_namics.pdf . See also Wuerthner, George. Livestock Grazing and Fire. January, 2003. http://web.archive.org/web/20040107135236/http://www.onda.org/library/papers/Livestock_Grazing_and_Fire.pdf ; and Michael H. Madany, and Niel E. West. Livestock Grazing-Fire Regime Interactions within Montane Forests of Zion National Park, Utah. Ecology: Vol. 64, No. 4, pp. 661-667.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wuerthner	George		OR	830	1	Fuels and Fire Management	the proposal talks about expediting grazing authorizations as "a tool to reduce wildfire" or to "improve rangeland conditions."This is a totally bogus argument. Grazing has been documented to spread cheatgrass. The best fire protection you could implement is eliminate livestock grazing. See this article http://www.thewildlifeneews.com/2020/03/03/cheatgrass-wildfire-and-livestock-grazing
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Loehlein	Kenneth	Wildearth Guardians	WA	686	1	Fuels and Fire Management	The BLM proposes to allow grazing to reduce wildfire risk. There is no scientific evidence that grazing will do this. However, there is scientific data that grazing causes the spread of invasive species such as cheatgrass. This increases the risk of larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Motta	Denise		MO	480	1	Fuels and Fire Management	The BLM proposal to authorize grazing to reduce wildfire risk and improve rangeland conditions, has no scienctific evidence that supports grazing can do either. To the contrary, there is substantial scientific data and literature that grazing is the cause of the spread of invasive species and cheatgrass, and increases the risk of larger, more frequent wildfires.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salo	Cindy		ID	968		1 Fuels and Fire Management	Targeted grazing is unlikely to stop big fires. The grazing described would provide growing season forage for livestock and let us feel that we're doing something, but would probably not dramatically change fire behavior. Here are two reasons why. a. Grazing is not very effective in reducing cheatgrass. Published research and ranchers' experience suggest that most of the livestock in a county would need to be confined in small areas and moved often to achieve the 2-inch cheatgrass stubble height mentioned. Grazing small areas sequentially results in uniform grazing, but also means that only some areas would be grazed at the right time to prevent cheatgrass regrowing. b. Big fires are extremely hard to stop. The leading edges of big fires stop at irrigated crop fields, but typically only slow briefly at roads, grazed areas, and fuel breaks. The maps of the Murphy Complex and Soda fires illustrate this. Yes, I've seen the photo of the fire that stopped at the greenstrip along I-84 near Mountain Home. But I've also seen the scars of the fires that burned through that greenstrip.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Short	Robert	Converse County, WY	WY	1396		4 Fuels and Fire Management	Rangelands Health Standards and Fire Management - Wildfires in Wyoming threaten vital habitat, especially that of critical and priority wildlife habitat and private property. The limited parameters for grazing management under existing permits continue to heighten the issue. Converse County urges BLM to consider the utilization of domestic livestock grazing to reduce fuel loads and the risk of fire. Allowing permittees to access rangelands earlier or later in the year, when cheatgrass can be combatted using livestock grazing, could be useful in managing fuel loads.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Zenker	Rev. Elizabeth		CA	257		1 Fuels and Fire Management	Please follow the substantial scientific data and literature that grazing is a significant cause of the spread of invasive species such as cheatgrass and increases the risk of larger, more frequent wildfires
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779		12 Fuels and Fire Management	Perform an honest evaluation of the contribution of livestock grazing to cheatgrass invasions and accelerated fire cycles. Provide more opportunities for the public to evaluate site-specific proposals for live livestock management actions that affect fire frequency and duration.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cotter	Justina		AZ	437		2 Fuels and Fire Management	LM proposes to authorize grazing to reduce wildfire risk and improve rangeland conditions even though there is no scientific evidence that grazing can do either. On the contrary, there is substantial scientific data and literature that grazing is a significant cause of the spread of invasive species such as cheatgrass that increase the risk of larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klingel	Jon		NM	846		2 Fuels and Fire Management	Livestock grazing should not be used to reduce fire risk. If grazing is so intense as to reduce fire risk, the land is clearly being overgrazed and livestock numbers need to be reduced. Such overgrazing results in excess erosion, soil damage, vegetation damage, wildlife habitat damage, stream, damage, riparian damage, water quality damage and, in forested areas, causes increased fire danger over time due to increased density of trees and shrubs. It is a lesson learned starting in the 1880s. The spread of cheat grass and the increased fire frequency caused by cheat grass are very detrimental, and are the result of livestock grazing

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lonn	Jeff		MT	642	1	Fuels and Fire Management	Livestock grazing is the primary cause of rangeland degradation and cheatgrass spread. Cheatgrass, in turn, greatly increases the risk of range fires. This is well supported by recent science. So why would the BLM propose expediting grazing authorizations “to reduce wildfire and improve rangeland conditions”? At a minimum, you should honestly evaluate the contribution of livestock grazing to cheatgrass spread and the resulting accelerated fire cycles. You should provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lopez	Judith		CO	1073	1	Fuels and Fire Management	it has been found that grazing leads to the incese of invasive annual grasses and larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vanderryn	Judith		CO	1423	2	Fuels and Fire Management	In addition, as our public lands become more crowded and overburdened, I ask that you take seriously proposals to manage public lands with the habitat value for native plant and wildlife species. The contribution of livestock grazing to the degradation of land, including increased vulnerability to invasive species, such as cheatgrass, and to wildfire, particularly in the increasingly dry western states, must be considered when developing permits
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Pamela		ID	585	4	Fuels and Fire Management	I do not accept the excuse that grazing helps alleviate fire danger and has positive benefits to the range. Grazing is responsible for the vast spread of invasive species, which increases fire danger.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gandolfo	Deborah		WA	56	1	Fuels and Fire Management	I am opposed to the changes being proposed to grazing regulation. It proposes to authorize grazing to reduce wildfire risk and improve rangeland conditions. There is no scientific evidence that grazing can do either. To the contrary, there is substantial scientific data and literature that grazing is a significant cause of the spread of invasive species such as cheatgrass and increases the risk of larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fullmer	Hannah		CA	268	1	Fuels and Fire Management	I am concerned that the proposed grazing regulation updates weaken land and habitat health, and will actually lead to increased fire hazards. For example, grazing has been shown to allow invasive plant species such as cheatgrass to flourish, which then lead to hotter and faster fires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	26	Fuels and Fire Management	Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	27	Fuels and Fire Management	Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	8	Fuels and Fire Management	Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	Tony		ID	1088	7	Fuels and Fire Management	Grazing is a tool that can provide flexibility and efficiency in helping to reduce fine fuel loads on public lands and as such we would like to see that this type of grazing be authorized and permitted by the AO
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wood	Lorna		AL	202	4	Fuels and Fire Management	grazing encourages the spread of invasive species known to contribute to causing larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heard	Tom		TX	969	4	Fuels and Fire Management	evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Casey	Claire		ID	985	1	Fuels and Fire Management	Do not use the wildfire excusse to say grazing is good for the land. It leads to invasive seed and grasses which in turn causes more wildfires and larger ones..... Cheat grasss is invading the west
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne		OR	691	1	Fuels and Fire Management	concerning are BLM's attempt to dismantle mandatory protections for threatened and endangered sage-grouse, and granting permission for cutting native trees in order to promote growth of livestock forage species. Scientific research has shown that these proposed actions will NOT reduce risk from wildfires or improve rangeland conditions, and in certain situations can worsen impacts from wildfires.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	AP		ID	767	1	Fuels and Fire Management	By increasing access to cattle, you may be unwittingly increasing wildfire issues. We have been told by more than one firefighter as well as hotshots, that cowpies are extremely difficult to douse once they've caught fire. They burn very hot and require multiple attempts to finally extinguish.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Viandier	Jamila		CT	402	2	Fuels and Fire Management	BLM should not authorize new/expanded grazing to reduce the risk of wildfire because grazing does not reduce the risk of wildfire, it increases it, since grazing promotes the spread of non-native plants, which in turn increases wildfire risk.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wasgatt	Ann		CA	334	6	Fuels and Fire Management	BLM proposes to authorize grazing to reduce wildfire risk and improve rangeland conditions. There is no scientific evidence that grazing can do either. To the contrary, there is substantial scientific data and literature that grazing is a significant cause of the spread of invasive species such as cheatgrass and increases the risk of larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	13	Fuels and Fire Management	BLM must ensure that any grazing practices considered for managing wildfire risk follow the best available peer-reviewed science and do not have the potential to exacerbate invasive weeds or further degrade native plant, soil and wildlife communities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	MacKenzie	Michelle		CA	953	1	Fuels and Fire Management	BLM must determine whether livestock grazing contributes to cheatgrass and more fire cycles and let the public evaluate this on each grazing site.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	2	Fuels and Fire Management	at a time when wildfires continue to increase in intensity and frequency, it is imperative that we have the regulatory flexibility to allow grazing to be utilized as a tool to combat excessive fuel loads and aid in creating defensible landscapes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lagergren	Ginna		ID	570	3	Fuels and Fire Management	Also, improper grazing practices lead to the increase of invasive grasses and larger, more frequent wildfires.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ayres	Peter		IL	467	3	Fuels and Fire Management	Use science also in the management of the grass lands in relation to fire. Ist there good evidence that cattle help reduce fires?
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Sauber	Michael	Taxpayer	NM	842	1	Fuels and Fire Management	There is no scientific basis for utilizing grazing to reduce wildfire. If utilization levels are so high that there is no chance of fire, that would also indicate that the watershed will suffer and wildlife will suffer, and in the end, the rancher will have destroyed the carrying capacity so fully that there would be permanent damage to the land and permitted numbers should be drastically reduced.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	15	Fuels and Fire Management	The use of livestock for fuels reduction brings with it a substantial risk of weed invasion. BLM must fully examine this likely impact in its NEPA analysis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	23	Fuels and Fire Management	The public notice for these proposed regulations indicates that BLM will be using livestock grazing to "reduce wildfire risk."28 The BLM has attempted to use this rationale before and continues to promote this false narrative that livestock grazing improves our rangelands. Scientific evidence has proven the opposite is true. Livestock consume substantial amounts of forage, removing native grasses that burn at a lower intensity than the fire-prone invasive species such as cheatgrass. As critical rangeland ecosystems become degraded under intensive, and lightly regulated, grazing, disturbance-resistant invasive species move in and take over the habitat. Paired with the increasing temperatures and decreasing precipitation regimes predicted under a changing climate, the risk of more frequent and higher intensity wildfires increases dramatically. Indeed, "The myths around livestock having beneficial effects on large fires only come when so much grass has been removed that there is nothing left to burn, which is a very bad outcome for the ecosystem."29 28 Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Revisions of grazing Regulations for Public Lands, 85 Fed. Reg. 3410, 3411 (Jan. 21, 2020). 29 Travis Bruner, Grazing Leads to Blazing, THE WILDLIFE NEWS (Aug. 21, 2015), https://www.thewildlifefenews.com/2015/08/21/grazing-leads-to-blazing/ .
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vincent	Randan		UT	923	6	Fuels and Fire Management	The problems caused by unmanaged fuels are very significant. I believe regulation should be enacted to allow for grazing to what ever degree deemed necessary to manage fuels. The BLM should also enact regulations that would allow for temporary structures such as fencing allowing for high impact grazing achieving a specific fire management goal. When wildfire requires the reduction of AUMS available for a permittee the BLM should restore those AUMs as quickly as possible. Wildfire can cause great economic and environmental issues for communities. Proper grazing and vegetation treatments can greatly help reduce the negative impacts of wildfire.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	1	Fuels and Fire Management	The BLM Scoping information ignores passive restoration to protect native vegetation communities and to recover native understories, shrubs and microbiotic crusts, a primary and essential element of preventing flammable weeds from choking public lands and reducing future fires. Passive restoration, (letting lands naturally heal from disturbance), helps ensure that public lands are in good condition and better able to withstand fires and other disturbances, and recover from fire events.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	3	Fuels and Fire Management	Section 4180.1, 4190.1 Topic Effect of wildfire management decisions, Fundamentals of Rangeland Health (Streamlining Opportunities, Targeted Grazing) Comment/Observation The following comments includes the BLM talking points document (attached). Depending on how this topic is further expanded upon in the environmental impact statement, this may or may not be a concern. The Department is not opposed to utilizing livestock grazing to "create fuel breaks" as long as this practice is very targeted and limited in extent across the landscape. Per one of the examples provided in the BLM talking points, "...the objective of the targeted grazing was to achieve a 2 inch stubble height (fuel break) within the treatment area." In this scenario the loss of hiding cover, and removal of virtually all seedheads could certainly have negative impacts on wildlife, such as small mammals, and could promote erosion and thus long term loss of soil productivity. The Department supports the stated benefits of minimizing the threat to life and property, and conserving important wildlife habitat and resource health. However, the Department is concerned about the loss of the important benefits fire plays within fire adapted ecosystems. Action: Regulations need to provide specific guidance for the implementation of targeted grazing that minimizes negative impacts to wildlife and their habitat components (short and long term). Action Requested Action: Rangeland health section should include wildfires (occurring within their natural range of variability) as an ecological process that needs to be maintained to support healthy biotic populations and communities. Wildfires are an important ecological process in fire adapted ecosystems, influencing species' occurrence and biodiversity by modifying landscape composition.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dieterich	Michele		MT	650	3	Fuels and Fire Management	First off, creating more grazing is not a tool for wildfire reduction. Grazing exacerbates fire and the cheat grass and other highly flammable invasive weeds that grazing promotes make it easier for fires to start. I don't understand the justification for this change at all. Please consider these studies before you approve expedited grazing as a tool to reduce wildfire. https://www.frames.gov/catalog/58941
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carter	Susan		NM	849	1	Fuels and Fire Management	Cattle have contributed to invasive grasses which accelerate wild fires. Scientific evaluations which study non-native Cattle impacts must be given highest priority by peer-reviewed, quantifiable methods.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jacobson	Susan		CO	631	3	Fuels and Fire Management	Carefully consider the science that indicates that invasive species are more likely to move into areas that have been grazed (particularly cheatgrass) and the impact this has on fire activity.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jacobs	Quida		FL	82	1	Fuels and Fire Management	BLM proposes to authorize grazing to reduce wildfire risk and improve rangeland conditions. There is no scientific evidence that grazing can do either. To the contrary, there is substantial scientific data and literature that grazing is a significant cause of the spread of invasive species such as cheatgrass and increases the risk of larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Slaughter	Kathy		CO	655	1	Fuels and Fire Management	As opposed to the language in the proposed regulations, increased grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Thompson	Troy	Wyoming County Commissioners Association	WY	881	6	Fuels and Fire Management	Wildfires in Wyoming threaten vital habitat, especially Greater sage-grouse habitat, and private property. WCCA asks that BLM revise its regulations to allow for the use of grazing to reduce fuel loads and the risk of fire. For example, grazing in the spring and fall can reduce the amount of fuel loads, including cheatgrass, a highly combustible and prolific invasive plant. Additional flexibility to address the increasing risk of range fires could be achieved by adding fuel reduction to the list of circumstances under which a free-use grazing permit may be issued. Allowing permittees to access rangelands earlier or later in the year, when cheatgrass can be combatted using livestock grazing, is another tool.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	DeSoto	Randi	Summit Lake Paiute Tribe	NV	883	7	Fuels and Fire Management	While expediting grazing authorizations in order to improve rangeland conditions and/or as a tool to reduce wildfire sounds effective, modern scientific literature shows that grazing is not likely to achieve either effect. On the contrary, modern scientific literature suggests that common grazing methods advance the abundance of invasive annual grasses and other noxious weeds (Belsky, 1. A. and 1. L. Gelbard. 2000) thus contributing to larger and more frequent wildfires (Belsky, 1. and D. M. Blumenthal. 1995). Federal agencies are mandated under the Endangered Species Act to utilize the best available science when making a decision about how our public lands are managed. Expediting grazing authorizations under the guise of conservation is scientifically proven to be contrary to this mandate.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Whicker	Keven	Beaver County	UT	754	6	Fuels and Fire Management	We would encourage the BLM to utilize targeted livestock grazing in reducing fuel loads as a precaution against dangerous wildfires. We also believe targeted grazing is an effective tool in combating invasive species such as cheatgrass. Utilizing grazing to target these problems would solve several problems while being low impact, economical and good for rangeland health.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	DeBolt	Ann		ID	724	2	Fuels and Fire Management	Through the process of developing new Grazing Regulations, the BLM must honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	24	Fuels and Fire Management	This is further demonstrated by a study conducted by Thomas C. Roberts Jr., evaluating the impact of three different vegetation types on wildfires in the Salt Lake Utah District of the Bureau of Land Management: cheatgrass (invasive), sagebrush-grass, pinyon juniper. According to the study, intact native habitats without a strong prevalence of cheatgrass were more resilient than cheatgrass-dominated ecosystems. Further, intact habitats required less frequent remediation efforts than invasive-dominated ecosystems; while native grasslands rebound quickly from disturbance, impacted grasslands can require up to two years and intensive capital investment to achieve restoration goals.30 30 Thomas C. Roberts & Stephan B. Monsen, Resource Impacts of Cheatgrass and Wildfires on Public Lands and Livestock Grazing, U.S. DEP'T OF AGRIC., 1994.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	MORAN	MARY		UT	914	1	Fuels and Fire Management	The idea that grazing is a reasonable tool to reduce wildfires is not backed up by any science. Indeed, monitoring shows the opposite: the more disturbed by grazing, the more invasive annual plants present, which significantly increases risks of wildfire.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Curtis	Elko County	NV	905	2	Fuels and Fire Management	Targeted grazing is a favorable option not only in rural areas, where livestock is plentiful, but also "is often a favorable option in the wildland urban interface where homeowners are particularly concerned about fire risk. In these situations, people have heightened concern over herbicide use, are often intolerant of the noise and disturbance caused by mechanical options, and do not find prescribed fire an acceptable alternative so close to their homes."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	13	Fuels and Fire Management	Rangeland Fire Protection Associations Another concept the BLM should analyze in the upcoming regulation revision is the support and expansion of rural firefighting programs like Idaho's Rangeland Fire Protection Association (RFPA) program. Idaho's RFPA program provides a critical first line of defense against wildfire in remote areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stewart	Kris	Ninety-Six Ranch LLC		1285	6	Fuels and Fire Management	PERMIT AND LEASE FLEXIBILITY -I think it is essential that permittee's rights be protected. If there is a fuels management issue, the permittee MUST be the key player allowed to build a coalition to deal with excess fuels on his permit. The Agency should not have the ability to overrun a current permittee. This is a reasonable fear that many operators have, in that powerful, well-heeled outside operators could outbid the main permittee and over run him in times of excess fuel. Permittees know who the good neighbors/partners are and should be allowed to build plans to take down fuel loads themselves without undue pressure or interference from the Agency.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Curtis	Elko County	NV	905	1	Fuels and Fire Management	Most damage caused by wildfire occurs in the Wildland Urban Interface. Available studies show that "Animals are most effective at treating smaller-sized live fuels and 1- and 10-hour fuels..." and can help disrupt the fuel ladder to keep flames lengths down. Livestock have proven useful in decreasing the amount of fine fuels in areas of moderate grazing. Fine fuels are "[f]ast-drying fuels... which are less than 1/4-inch in diameter and have a timelag of one hour or less." These fuels play a large role in fire management because they "...readily ignite and are rapidly consumed by fire when dry." Moderate, long-term grazing has been found to decrease the probability of severe, catastrophic wildfires." Part of this is because "[t]otal fine fuel accumulations were twofold higher in nongrazed compared to grazed treatments."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mackaben	Ronny		MT	757	1	Fuels and Fire Management	Mob grazing is highly successful in reducing wildfire risk and improving rangeland health, and has been proven successful in control of winter annuals and bi annuals, and noxious weeds such as leafy spurge.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	11	Fuels and Fire Management	It is widely accepted in science and sufficient evidence exists that proper livestock grazing can provide an ecological benefit to public lands. One of the most important benefits associated with livestock grazing is its ability to reduce fine fuels across a landscape. According to Svejcar et al. (2014): Grazing is one of the few tools available to reduce the herbaceous vegetation that becomes fine fuel on rangelands, particularly at large spatial scales. This is especially true if invasive annual grasses are present (e.g. Diamond et al. 2012). Native bunchgrasses also can be more susceptible to fire mortality when they are not grazed because litter accumulates near their growing points; bunchgrass mortality opens the plant community to invasion by exotic annuals (Davies et al. 2009). These situations provide examples of the importance of maintaining grazing as a vegetation management tool. This again attests to the need for flexibility in management to properly address fine fuels on rangelands. According to analysis by Idaho State University, the mean fire size in the West is increasing, and 61% of the total area burned since 1950 occurred between 2000 and 2017. (ISU, 2018) Brooks and Pyke 2001, point out that these invasive annual grasses promote more frequent fires and develop a cycle in which native shrub and grass species cannot survive. These studies demonstrate that the West is consistently seeing large catastrophic wildfires on rangelands and livestock grazing is one of our best available tools to proactively manage fuels. Land managers must have the flexibility to adjust livestock grazing permits to address fine fuels on an annual basis.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keeler	Murray & Judy		NM	1018	9	Fuels and Fire Management	It has been our observation that cattle grazing helps reduce wildfire risks. We encourage BLM to implement prescribed fires, in cooperation with the allotment holders to further reduce this risk. Funding for prescribed fires should be increased and the NEPA hurdles kept to a minimum.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Withroder	Amanda	Wyoming Game and Fish Department	WY	1014	8	Fuels and Fire Management	In what ways can livestock grazing be used to reduce wildfire risk and improve rangeland health? Livestock may be used to reduce fine fuel loads in areas prone to wildfire risk. The use of herbicides, prescribed fire, seeding of native plant species, and other tools should also be considered and utilized in cooperation with grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	George	Jeffrey		KS	760	3	Fuels and Fire Management	I oppose any measures to expedite grazing authorizations as “a tool to reduce wildfire” or to “improve rangeland conditions.” The scientific research on this subject doesn’t support the notion that livestock grazing improves rangeland conditions or reduces wildfire threats. In fact, much research indicates the exact opposite; pointing to the conclusion that grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires. Let’s use science, not short term political and economic considerations to ensure the continued improvement of our rangelands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Atkinson	Susan		CO	633	1	Fuels and Fire Management	Expediting grazing authorizations as “a tool to reduce wildfire” or to “improve rangeland conditions.” There is no positive correlation in the scientific literature that suggests grazing can achieve either outcome and a large body of evidence to the contrary, but it’s clear that BLM seeks to expedite these types of permits under the guise that it will benefit public lands. In fact, grazing leads to the increase of invasive annual grasses and larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mueller	Melinda	Wallingford Indivisible	WA	643	1	Fuels and Fire Management	Claims that grazing reduces fire hazards are not supportable. Both cheatgrass and russian thistle, for example, pose significant fire hazards compared to native vegetation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jaegers	Martha		MO	252	1	Fuels and Fire Management	BLM proposes to authorize grazing in order to reduce wildfire risk and improve rangeland conditions. There is no scientific evidence that grazing can do either of these things. To the contrary, there is substantial scientific data and literature that grazing is a significant cause of the spread of invasive species such as cheatgrass and increases the risk of larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Curtis	Elko County	NV	905	3	Fuels and Fire Management	Based on these considerations, Elko County recommends that the agency examine what the effect of targeted grazing on the wildland urban interface will be, especially as compared to other vegetation removal methods like spraying, mechanical removal, and prescribed burning. Particularly, it should examine the effect of targeted grazing on the wildland urban interface in remote, rural communities with few or no nearby fire protection crews or apparatus. Murray, R.B. and J.O. Klemmedson. 1968. Cheatgrass range in southern Idaho: Seasonal cattle gains and grazing capacities. Journal of Range Management 21:308-312. Foster, et. al. 2015. Reducing Cheatgrass Fuel Loads Using Fall Cattle Grazing. University of Nevada Cooperative Extension. Frost, R.A. and K.L. Launchbaugh. 2003. Prescription Grazing for Rangeland Weed Management - A New Look at an Old Tool. Rangelands 25: 43-47.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Curtis	Elko County	NV	905	4	Fuels and Fire Management	Based on these considerations, Elko County recommends that the agency examine what the effect of targeted grazing on the wildland urban interface will be, especially as compared to other vegetation removal methods like spraying, mechanical removal, and prescribed burning. Particularly, it should examine the effect of targeted grazing on the wildland urban interface in remote, rural communities with few or no nearby fire protection crews or apparatus. Murray, R.B. and J.O. Klemmedson. 1968. Cheatgrass range in southern Idaho: Seasonal cattle gains and grazing capacities. Journal of Range Management 21:308-312. Foster, et. al. 2015. Reducing Cheatgrass Fuel Loads Using Fall Cattle Grazing. University of Nevada Cooperative Extension. Frost, R.A. and K.L. Launchbaugh. 2003. Prescription Grazing for Rangeland Weed Management - A New Look at an Old Tool. Rangelands 25: 43-47.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	25	Fuels and Fire Management	Additionally, climate change has become an increasing threat to the resiliency of grassland ecosystems to wildfire. Climate change will result in higher temperatures and more frequent and intense drought. In grasslands where flora is very sensitive to variations in temperature, the result is likely to be an increase in the frequency of very active fire seasons and activities that lead to increased wildfires (e.g. overgrazing), and instead implement policies centered on fire prevention. "Prevention measures seek to reduce the number of large fires and their economic and ecological impacts, primarily through vegetation management."32 In the EIS BLM should give careful consideration to the contribution of livestock grazing to the increase of invasive grasses and accelerated fire cycles. 31 STEPHAN H. SCHNEIDER ET AL., CLIMATE CHANGE SCIENCE AND POLICY (2014). 32 Id. at 100.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nagel	Clinton	Gallatin Wildlife Association	MT	949	4	Fuels and Fire Management	4. the fallacy of installing fuel breaks. I would like BLM to once again refer to the comments of a fellow retired BLM employee Roger Rosentreter, PhD dated August 5, 2019. These comments were written in addressing BLM Draft Programmatic EIS for Fuel Breaks in the Great Basin. "I personally have seen more harm than good come from attempting to install fuel breaks. These proposals are ways to spend money and make the BLM fire program an empire unto itself. It is also a smoke screen for avoiding "the elephant in the room", which is overgrazing and poor livestock management. The BLM should work on ways to control and limit the growth of cheatgrass, not provide more disturbed habitat for non-native species to invade."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nagel	Clinton	Gallatin Wildlife Association	MT	949	3	Fuels and Fire Management	3. the fallacy of thought that increasing grazing will reduce the need of wildfires. Yet there is a strong link whereby the actions of BLM to allow grazing on newly burned areas which contain natural grasses actually decreased site resistance to cheatgrass. So, before there is a mass rush to use grazing to prevent wildland fires, contemplate the cycle of cheatgrass in this cycle. Please use this reference. https://pubs.er.usgs.gov/publication/70195821 BLM must stop the action of expediting grazing authorizations as "a tool to reduce wildfire" or to "improve rangeland conditions." This is not scientific proven. Livestock grazing may have some positive impact on reducing fire fuels, but at what cost. Please reread #2 above.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	3	Fuels and Fire Management	2.The EIS should evaluate and present to the public the best available information on the relationship between grazing and wildfire. We are unaware of any literature that suggests that grazing reduces the risk of wildfire; on the other hand there is substantial evidence that grazing increases that risk by leading to the increase of invasive annual grasses and larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Depoali	Ed			1420	2	Fuels and Fire Management	1. Repeated frequent fire occurrence, coupled with dominating invasive species are now common. This condition was not prevalent 95 years ago. * On certain rangeland, invasive species have replaced natives, yet management continues based on conditions that no longer exist.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Depoali	Ed			1420	3	Fuels and Fire Management	1. Repeated frequent fire occurrence, coupled with dominating invasive species are now common. This condition was not prevalent 95 years ago. * On certain rangeland, invasive species have replaced natives, yet management continues based on conditions that no longer exist.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nagel	Clinton	Gallatin Wildlife Association	MT	949	1	Fuels and Fire Management	1. the relationships between wildfire, livestock grazing and the occurrence of cheatgrass. There needs to be a sincere review of current thought and look at the science, ie: the relationship between grazing and cheatgrass. Many of us have long thought that increased domestic livestock grazing increases the likelihood of cheatgrass invasion. We advise BLM to look at this reference. http://www.greatoldbroads.org/wp-content/uploads/formidable/44/Reisner-et-al.-2013_Cheatgrass_Grazing_highlighted.pdf We also offer up this reference found at the link below. Here it states that disturbance (from grazing) actually increases the likelihood that exotic plant species become entrenched as the biocrusts integrity is reduced. https://esajournals.onlinelibrary.wiley.com/doi/abs/10.1002/eap.2016
Biological Resources								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	5	Biological Resources	The rules should require more careful consideration of (and avoidance of) adverse impacts to wildlife, including big game, ground nesting birds, uncommon plants, pollinators, and aquatic species. Ensure that livestock grazing is not impairing the maintenance of viable populations including well-distributed plant and animal communities with healthy age-class distributions. Focus on species that are sensitive to livestock grazing such as aspen and other highly palatable plants, and animals that live near the ground such as ground-nesting birds, amphibians, mollusks, etc...
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Quammen	Betsy			1358	2	Biological Resources	monitoring is not currently adequate. The BLM, under NEPA, FLPMA and the ESA, must to ensure that livestock numbers are not exceeding the ability of the land to be resilient. Livestock operations using public land leases must be managed to maintain viable wildlife populations (especially of threatened and endangered species); to make sure water resources are clean and running at normal levels; and that native vegetation is robust and not disappearing with the spread of noxious weeds.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vanderryn	Judith		CO	1423	2	Biological Resources	In addition, as our public lands become more crowded and overburdened, I ask that you take seriously proposals to manage public lands with the habitat value for native plant and wildlife species. The contribution of livestock grazing to the degradation of land, including increased vulnerability to invasive species, such as cheatgrass, and to wildfire, particularly in the increasingly dry western states, must be considered when developing permits
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	9	Biological Resources	Forbid destruction of native vegetation to increase forage for livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	7	Biological Resources	Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	5	Biological Resources	Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Scarborough	Jim		WA	26	1	Biological Resources	Changes to BLM's grazing regulations must prioritize native flora and fauna, as well as the much larger portion of the public which often visits but does not extract or detract from the abundant natural resources found on these public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1274	2	Biological Resources	We strongly support: planned removal of livestock from sensitive species habitat across BLM lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Abraham		UT	1166	3	Biological Resources	We are all still suffering the consequences from the blatant moves that the BLM implemented against the ranchers and their grazing allotments during the 1990's in the name of "endangered species protection." It would be good to undo some of the wrongs that were put in place against the ranchers during these years.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Micah	12 Ranch	OR	1249	1	Biological Resources	Ventenanta has become a major issue in the Prineville BLM District. This invasive weed is taking over our native rangelands, destroying sage-grouse habitat and limiting grazing. Chemical herbicides seem to be the only moderate effective tool to reduce the impact. The problem is multiplied by the season long and often, year long grazing of wildhorses.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wilson	Micah	12 Ranch	OR	1249	4	Biological Resources	The wildhorse is destroying our rangelands. Unlike cattle, deer & elk; horses seldom leave their home range. Thus year long grazing is occurring in their home ranges the numbers have reached an unsustainable point, not only for limiting cattle numbers, but also for the health of the wildhorse.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Collins	Kathleen		CO	765	1	Biological Resources	One significant environmental impact I can see immediately is the increasingly quick replacement of indigenous grasses and forbs being replaced by invasive species. Of special note is the spread of cheatgrass. Cheatgrass grows in any disturbed soil, and grows faster than the indigenous grass species can, preventing indigenous grasses to grow. In addition, cheatgrass burns hotter than indigenous grass species, increasing the possibility for megafires.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1274	3	Biological Resources	Livestock grazing is causing cheatgrass + other weeds to proliferate across the west. Lands cannot be effectively restored with continued grazing. BLM regulations must be much more restrictive. BLM must require mandatory measureable use + trampling standards, upland riparian communities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1274	1	Biological Resources	BLM must analyze rapidly terminating livestock grazing in order to prevent sage-grouse, pygmy rabbit, native fish + other plummeting species extinction.
Vegetation								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Ade	Kane County Commissioners	UT	1141	10	Vegetation	Using livestock for invasive weed management is cost effective and has less of an impact than other weed management methods, such as the use of heavy equipment or chemical herbicides
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Borchert	Robert		CA	264	1	Vegetation	Grazing is a significant cause of the spread of invasive species such as cheatgrass and increases the risk of larger, more frequent wildfires, resulting in degraded fish and wildlife habitat, denuded streams, and the replacement of native plants and grasses with invasive species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	37	Vegetation	The role of passive restoration in promoting resilience and resistance must be fully examined - vs. the proposed reg changes which will increase grazing damage, thus lowering resilience and resistance.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Devlin	Todd			1120	9	Vegetation	Develop water in roadless areas so as to use sheep and goats to control noxious weeds.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jauhola	Christine		CO	1254	6	Vegetation	What are the potential impacts to perennial grasses and biotic crusts from proposed use of grazing to reduce fire risk?

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	15	Vegetation	While BLM purports to follow an integrated weed strategy, in practice BLM greatly fails to regulate livestock disturbance or other CAUSES of weeds, allows cows/sheep to transport weeds onto public lands/allows grazing animals to move from weed infested areas to uninfested sites, fails to provide grazing rest/reductions necessary for lands to heal and be able resist weeds, and be in better condition when a fire actually occurs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Peeler	Teresa	Rising Storm	CO	15	1	Vegetation	We have seen over many years the damage done by livestock grazing on the public lands that belong to the American people! One proven issue - cheatgrass spread is aided by livestock grazing. You simply cannot reduce oversight without opening public lands up for even greater destruction!
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paulton	Bill		SD	796	2	Vegetation	To maintain healthy and plentiful GRASS PRODUCTION on arid and semi-arid lands of the West, cattle grazing is vital. The science of grass range management proves the truth of this. Any arid or semi-arid lands from which cattle have been removed turn into sand/dirt, cactus and brush wastelands in as few as 10 years. Documentation has proven this time and time again. RIPARIAN areas also benefit tremendously from cattle grazing: grass will grow to the water's edge, flooding will not cause such great damage, beauty of the area will be maintained, to mention a few.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Goodman	Pamela		MI	250	1	Vegetation	These areas become overgrazed and causes environmental damage that affects the native species that exist in these areas. We need the vegetation that covers this land to help absorb carbon and to help produce more oxygen to keep our planet healthy.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cornez	Sandi		OR	531	1	Vegetation	There is substantial scientific data and literature that grazing is a significant cause of the spread of invasive species such as cheatgrass and increases the risk of larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paltin	Sharon		CA	141	1	Vegetation	The unique native grasses and other flora need an ungrazed area to hold forth, and I ask you to protect the "commons" of public BLM land with all this in mind.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	2	Vegetation	The rules should recognize that some ecosystems are not highly suitable for grazing. Bunch grasses evolved with different kinds of herbivory and are not suitable for livestock grazing. Grazing should be eliminated or grazing seasons should be very short in order to prevent irreversible damage to drought-stressed plants and it will significantly impact the ability of plants to set seeds. * The rules should provide for long-term viability of native plants by allowing plants to fulfill their full lifecycle including flowering, seed set, and sexual or asexual reproduction without significant interference by livestock grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	24	Vegetation	The rules should address the fact that livestock grazing spreads weeds that alter vegetation structure, habitat, hydrology, and fire regimes. Weeds are a slow motion explosion that are adversely affecting native plant communities and entire ecosystems. By reducing the vigor of native plants, reducing soil cover, and exposing mineral soil, livestock grazing has a strong tendency to spread invasive weeds and exacerbate this problem. The agency should limit or exclude livestock in order to help prevent the spread of weeds.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	harker	christine		MO	338	1	Vegetation	The Proposals from the BLM to change grazing regulations fial entirely to take into account current research on the effects of reducing native plant species in order to augment grazing forage. This practice has not been shown to succeed but rather destabilizes soil ecology resulting in worsened forage for wild animals and domestic stock alike.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kitchen	Boyd		UT	51	1	Vegetation	The point is in many of these ranges, the native species will have to compete with non-native species, either undesirable species like downy brome, Russian thistle and halogeton, or more desirable species like Siberian wheatgrass.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Naples	Jean		NY	386	3	Vegetation	The BLM must ensure that NEPA analyses appropriately considers the habitat of species in crisis as part of the curent broader extinction crisis. The BLM must honesty evaluate the contribution of livestock grazing to cheatgrass, accelerated fire cycles and provide ample opportunity for the public to evaluate site-specific proposals for fire-related livestock actions, Any grazing management practices must forbid any destruction of native vegetation to increase forage for livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Milton	Mimsi		CO	478	1	Vegetation	The best scientific evidence shows that grazing increases the spread of non-native species, such as cheat grass, which fuels fire.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salo	Cindy		ID	968	2	Vegetation	Targeted grazing is certain to degrade sagebrush steppe vegetation. Our native perennial grasses are weakened by growing season disturbances, including grazing. These plants are the thin green line that holds ground against cheatgrass and survives fire to protect soil and recover quickly. Perennial grasses only grow actively during the short time between the "too cold" of winter and the "too dry" of summer. Disturbance during this time weakens these plants. When weakened, perennial grasses cannot outcompete cheatgrass and cannot recover after inevitable fires. This leads to soil erosion and expensive reseeding.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	33	Vegetation	Require the EIS include scientifically substantiated research regarding livestock grazing is the single biggest factor in the spread of weeds, and the establishment of cheatgrass, an exotic annual that is prone to fires.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Bert		NV	1441	1	Vegetation	Recognize cheat grass and include it in the stocking rate and utilization of our grazing allotments. This will also remove wildfire. Flexibility on our grazing allotments will see cheat grass replaced by perennial plants - rest from grazing is not land management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	simons	anita		CA	366	1	Vegetation	Rather grazing is a significant cause of the spread of invasive species such as cheatgrass and increases the risk of larger, more frequent wildfires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Short	Robert	Converse County, WY	WY	1396	5	Vegetation	Rangelands Health Standards and Noxious Weed Management - BLM should consider revising these regulations to permit the use of grazing to address invasive plants. Livestock grazing on public lands can be utilized to reduce invasive and noxious plants, such as cheatgrass. BLM grazing regulations should allow flexibility to use grazing as a tool to reduce noxious and invasive plants on public lands. BLM should also consider under what circumstances herbicides may be used on public lands to manage invasive and noxious plants.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	10	Vegetation	Now, there are several additional papers detailing that grazing causes flammable ecosystem-dooming annual grass infestation and spread. Williamson et al. 2019 https://link.springer.com/article/10.1007%2Fs10530-019-02120-8 Fire, livestock grazing, topography, and precipitation affect occurrence and prevalence of cheatgrass (Bromus tectorum) in the central Great Basin, USA. 2019. Biological invasions. Vol. 22, pps. 663-680. "Our novel time-series data and results indicate that grazing corresponds with increased cheatgrass occurrence and prevalence regardless of variation in climate, topography, or community composition, and provide no support for the notion that contemporary grazing regimes or grazing in conjunction with fire can suppress cheatgrass".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	30	Vegetation	It is important to understand the reentry for grazing in most areas (e.g., spring/summer and fall grazing in the same year) WILL be required in order to meet objectives, especially where cheatgrass is present and needs reduced. Mosley and Rosell (2006) highlight "annual grass density may exceed pre-treatment levels within one to five years" if grazing schemes are not employed that reduce density along with yield (p. 71). This will require reentry nearly every year, at least every year with fall precipitation, to allow fall grazing that has been shown, in Nevada, to reduce yield AND density of cheatgrass (Tausch et al., 1994. Smeltzer et al. (Gund Ranch research)).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	2	Vegetation	It also helps to buffer ever-growing climate change stress. As cheatgrass and other weeds spread due to continued harmful levels of livestock grazing exacerbated by climate change stress (see Beschta et al. 2012), all sagebrush communities are extremely sensitive to grazing and other exploitive disturbance. Several of the lax grazing management schemes that are proposes will maximize cheatgrass and flammable weed spread (severe Targeted Grazing disturbance of soils/crusts/veg, cows as weed vectors, intensive water haul driving, supplement placement; loose and chaotic Outcome Based Grazing which is likely to include minimal top no mandatory measurable use standards) so ranchers can get extra - or even free -grazing.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	1	Vegetation	Invasive species treatment: If BLM is serious about rangeland health and soil health they would work with the permit creative ideas and ways to address issues. Creosote is very invasive in out west and much research has been done and so much new technology will become available in the near future but if I walk into the BLM with a out of the box ideas first response when I say can I... is NO.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ocean	David		CA	973	2	Vegetation	I have personally seen areas where, although grazing may have been cited as a way of reducing wildfire, it also seriously denuded understory vegetation and vital wildlife habitat.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dieterich	Michele		MT	650	1	Vegetation	I am often dismayed at the damage that grazing causes to riparian areas and the invasive grasses it promotes. Cheat grass is highly flammable and grazing brings it in by the truckload.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spotts	Richard		UT	1235	9	Vegetation	Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions. * Forbid destruction of native vegetation to increase forage for livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Blair	Dan			1190	2	Vegetation	Honestly evaluate the contribution of livestock grazing to cheatgrass and accelerated fire cycles and provide more opportunity for the public to evaluate site-specific proposals for fire-related livestock actions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	41	Vegetation	Grazing leads to increased invasions of annual grasses such as cheatgrass which in turn heightens fire risk, and the best way to control invasion is to maintain native bunchgrasses and biological soil crusts, both of which are diminished by grazing (Condon and Pike 2018; Reisner et al. 2013; Williamson et al. 2019).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bocchino	J		NY	444	1	Vegetation	grazing is a significant cause of the spread of invasive species such as cheatgrass and increases the risk of larger, more frequent wildfires.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	18	Vegetation	Grazing as a causal factor of weed infestation weed expansion must be fully assessed in the Grazing Reg EIS, and regulations adopted to minimize degradation such as currently is taking place. To do so, BLM may have to re-scope this project, because the TG, OBG, flexibility, streamlining, weakening of the FRH process to give livestock more leeway --- ALL will make matters even worse.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rappaport	Alexandra		NV	269	1	Vegetation	grazing alters the landscape and can increase the number of invasive species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Devlin	Todd			1120	10	Vegetation	Give more funding to noxious weed control.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Blair	Dan			1190	5	Vegetation	Forbid destruction of native vegetation to increase forage for livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fasullo	Jane		NY	289	1	Vegetation	Every time humnas disturb the soil or bring in animals whcih disturb the land, invasive species take hold throwing out the balance of nature in the area. Foods for indiginous species vhang. Materials for taking cover or using for nestng change. Protective cover that keeps the lands from drying out change. And as these plants change so do the animals that depend on them.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	29	Vegetation	Dormant season use coupled with typical grazing season (late spring through summer) moderate use should be recognized in the permit renewal. This would include the science that has shown that a dormant season grazing system that incorporates moderate spring-through-summer use combined with utilizing 50% of the standing plant biomass "is a preferable, and moreover, a beneficial management alternative" in increasing greater herbage production and greater leaf heights in many grasses (Faulkner et al. 2002).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Gene		UT	806	1	Vegetation	Control Invasive Species A. Restore Spring Aums. There should be flexibility in off dates based upon weather and forage conditions. Over the past 20+ years our Spring off dates have been moved from June 15 to May 1 with no flexibility for circumstances. This has allowed the cheat grass to flourish. On dry years the cheat grass is short and turns quickly. On wet years the cheat grass can grow 6 to 12 inches and flourish reseeding and choking out native grasses. Having an off date of May 1 prohibits the permittee to graze the forage and thereby control the cheat grass. B. Reseeding. Our allotment as well as numourous others has never been reseeded with native grasses such as created wheat, four wing salt brush, needle and thread and Indian rice grass. Unless a fire occurs, most permits do not have a regular maintenance program for reseeding, allowing for optimal range health.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Rama			1191	6	Vegetation	contributes to the spread of invasive species like cheatgrass and provides the perfect environment for pinyon- juniper encroachment that directly works against a nation-wide effort to increase greater sage-grouse habitat.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rossman	Amy		OR	730	1	Vegetation	As a botanist I see that grazing has devastated the grasslands of the western United States. In many places there are absolutely no native plants left except for what cows do not eat such as thistles and irises. It is time to allow these grasslands to recover and provide needed biological diversity that hold ground water and supplies nutrients to the soil. Otherwise the grasslands will not even be good for grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Otley	Susan		OR	1486	1	Vegetation	anything under an acre there should be immediate action taken with any resource available. Now, because this wasn't done in the past, there are whole ranges covered by this invasive grass. not only does it reduce the forage it provides fuel for fires. Also steps should be in place to control Medusahead and other non-native invasive species where there are established large acreages as well.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	39	Vegetation	Also, targeted grazing can lead to dispersal of seeds (after they pass through an animal) and spread of undesirable species requiring corralling for several days before they can be moved elsewhere (Bailey et al 2019)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	38	Vegetation	Absent all of this (and perhaps even with it), targeted grazing can backfire and lead to preferential herbivory of desired perennials and spread of undesirable exotic species including those targeted for reduction. Further, targeted grazing presumes that desired perennials will fill the void left by the defoliated exotic annual grasses. However, in many areas, desired perennials can be outcompeted by species even less desirable than cheat grass (Mosely and Roselle 2008).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Parkinson	Laurie		CO	991	2	Vegetation	Vast areas of non-native grasses introduced to create more forage for livestock vs diverse vegetation of native plants Cheat grass, lots of it, in overgrazed areas Grazed landscapes that bear no resemblance to the natural state of the land
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hoffman	Ted		ID	1021	4	Vegetation	Vast areas of arid range can no longer produce even cheat grass because of overly frequent fire and the presence of annual grasses that produce very little litter- resulting in the loss of organic matter and destruction of fertility. Vast areas are dominated by invasive grasses or weeds.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	20	Vegetation	This project promotes more intensive grazing disturbance which will foster more and worse cheatgrass and other weed problems. See also: https://link.springer.com/article/10.1007/s10530-019-02120-8 Fire, livestock grazing, topography, and precipitation affect occurrence and prevalence of cheatgrass (Bromus tectorum) in the central Great Basin, USA. Matthew A. Williamson, Erica Fleishman, Ralph C. MacNally, Jeanne C. Chambers. Bethany A. Bradley David S. Dobkin. David I. Board. Frank A. Fogarty. Ned Horning. Matthias Leu. Martha Wohlfeil Zillig. Our novel time-series data and results indicate that grazing corresponds with increased cheatgrass occurrence and prevalence regardless of variation in climate, topography, or community composition, and provide no support for the notion that contemporary grazing regimes or grazing in conjunction with fire can suppress cheatgrass.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Greenfield	Judy		CO	132	2	Vegetation	There is no scientific proof that grazing helps mitigate wild fires. In fact, cattle spread cheat grass which degrades the environment (it does not provide for native wildlife) and is itself highly flammable.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Coles-Ritchie	Marc			1186	1	Vegetation	The impacts of livestock grazing are a serious problem. Livestock remove much of the vegetation which alters plant communities and often results in non-native species abounding. This is exacerbated by seeding of non-native pasture grasses, which should never happen on public lands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	42	Vegetation	Reisner et al. (2013) conducted research on cheatgrass (Bromus tectorum) in sagebrush steppe habitats or ecosystems in the Great Basin and found that: * "Native bunchgrass structure, abundance and composition, along with biological soil crust cover, played important roles in controlling B. tectorum dominance. They found that abundant bunchgrasses limit invasions by limiting the size and connectivity of gaps between vegetation, and that biological soil crusts appear to limit invasions with gaps. The results indicate that cattle grazing reduces invasion resistance by decreasing bunchgrass abundance, shifting bunchgrass composition, and thereby increasing connectivity of gaps between perennial plants while trampling further reduces resistance by reducing biological soil crusts." * "Grazing exacerbates Bromus tectorum dominance...by adversely impacting key mechanisms mediating resistance to invasion. If the goal is to conserve and restore resistance of these systems, managers should consider maintaining or restoring: (i) high bunchgrass cover and structure characterized by spatially dispersed bunchgrasses and small gaps between them; (ii) a diverse assemblage of bunchgrasses to maximize competitive interactions with B. tectorum in time and space; and (iii) biological soil crusts to limit B. tectorum establishment. Passive restoration by reducing cumulative cattle grazing may be one of the most effective means of achieving these three goals." The authors concluded that: * "Our findings raise serious concerns regarding proposals to use cattle grazing to control B. tectorum in these systems where remnant bunchgrass communities persist. In contrast, our findings support recent guidance for passively restoring resistance of these systems by reducing grazing levels."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	19	Vegetation	New 2019 scientific papers describe the serious threats of cheatgrass and annual grasses to arid western ecosystems. Mountains are becoming treeless - as these grasses that thrive in the wake of fires and grazing. High levels of grazing that would continue or be increased under the proposed revisions would exacerbate and levate the threat of weeds like cheatgrass.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schenk	Sherry		CO	1406	1	Vegetation	Livestock grazing on public lands can have negative impacts on senditive plants, particularly in riaprian areas. While I do know that grazing can be managed in such a way that damage does not happen or is minimal, preventing damage takes active management. Cattle need to be moved if they are over grazing an area, if they are creating a hoof marked muddy mess along riparian areas, and if they are destroying habitat by actions such as eating tender shoots of aspen to the exent that new growth does not happen.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Blackburn	Dennis	Wayne County Commission		1363	5	Vegetation	Livestock grazing can also be used as a tremendous tool to treat invasive species. Invasive plants in the western United States including cheatgrass, phragmites, and others have been successfully treated in defined areas through livestock grazing. Using livestock for invasive weed management is cost effective and has less of an impact than other weed management methods, such as the use of heavy equipment or chemical herbicides. Livestock producers also benefit from the use of additional feed provided by the invasive species. Invasive species are a growing problem on western range lands, and threaten the integrity of watersheds, wildlife habitat, and a variety of natural ecosystems. Livestock permittees should be utilized to combat these threats as true partners in range conservation and stewardship.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Greenfield	Judy		CO	132	1	Vegetation	I am also concerned that livestock grazing has been the impetus for the "chaining" of native vegetation that the BLM is doing - total removal with heavy machinery - in order to create more grazing land. That completely contradicts that chaining is done to "protect the landscape."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	20	Vegetation	High levels of grazing use and removal of protective vegetation results in hotter, windier, drier more weed prone/weed-invaded sites that burn earlier in the year. It really appears as if these proposed changes are aimed at EXPANDING cheatgrass dominance, so ranchers can get more AUMs based on grazing cheatgrass, and ultimately take over the public lands once the wildlife populations plummet more, and they become bleak ugly intensively managed cow feedlot-like wastelands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jacobson	Susan		CO	631	4	Vegetation	Discontinue the practices of masticating and chaining which destroy native species and habitat.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	16	Vegetation	BLM must candidly address the significant role its own vegetation treatments, exotic grass seedings and flawed fire rehab play in expanding flammable grasses and other weeds. In fact, the BLM's out-dated 2007 17 States Veg EIS on which BLM relies for its NEPA coverage for herbicide use specifically did NOT take into account and did not address and control causal factors of weed infestation and spread. It failed to address grazing damage and other causal factors.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	11	Vegetation	WLD has often submitted information and scientific papers, such as Belsky and Gelbard (2000) Reisner Dissertation 2010 and Reisner et al. 2013 to BLM as project comments --demonstrating that cattle grazing causes cheatgrass.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	46	Vegetation	With spring and fall grazing periods, it is impossible to understand the amount of forage cows actually consume -because grasses regrow during moist periods after being grazed - thus there can be over 100% utilization, including on native species, while unpalatable coarse exotics like cwg receive less than 30%. This explains the forb depletion and many other problems that BLM writes off as caused by "historic" grazing, or its own past "treatments" or other factors in its flawed and false FRH assessments and determinations in allotments that have suffered chronic TNR and other abuses.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	43	Vegetation	Williamson et al. (2019) analyzed fourteen years of data from 417 sites across 10,000 square kilometers in the central Great Basin to assess the effects of fire, grazing, and other factors on cheatgrass occurrence and prevalence. They found that grazing and the proportion of years grazed were strong positive predictors of occurrence and prevalence, and concluded that "[o]ur novel time-series data and results indicate that grazing corresponds with increased cheatgrass occurrence and prevalence regardless of variation in climate, topography, or community composition, and provide no support for the notion that contemporary grazing regimes or grazing in conjunction with fire can suppress cheatgrass."

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kildew	Kim	Boulder Creek Ranch	ID	1483	2	Vegetation	Wildland range fires in the west and on my allotments have created the expansion of non-traditional grass species in the form of medusa head rye and cheat grass. These species have overtaken many burn areas on my permitted lands. These invasive species are not palatable for grazing by sheep, cattle, elk, deer, or antelope except for a brief window in the spring when the grass is green and tender. Later in the season (June-September) the grass dries and becomes unpalatable for livestock or wildlife. the invasive gross can be foraged upon and set back in terms of its spreading if grazed properly in the early spring. That type of utilization was confirmed to me by BLM biologist. However my permit restricts or prohibits any grazing on these areas in the spring every third year on a rotating basis. When grazed properly this species is set back and the native bunch grasses can then compete and over time re-establish themselves.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bradshaw	Charlie		WY	1379	9	Vegetation	We request the BLM address the notion that sheep and cattle grazing increase the spread of noxious weeds, and in particular, cheat grass. We have witnessed cheatgrass high on the side of hills/mountains where sheep and cattle cannot access so the notion only domestic livestock spread noxious weeds is a false statement.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	1	Vegetation	We request that BLM apply all considerations and concerns raised in our 2018 comments to Elko BLM on "dormant" grazing and veg treatments (this is similar and/or contains the elements of targeted grazing, flexibility, streamlining, disregard for the FRH, etc.) into the analysis of the Trump administrations' proposed Grazing Regulation changes. These comments often reference BLM "treatments" as a plethora of BLM and USFS vegetation "treatments" are spawning flammable weeds, and causing hotter, drier more fire prone landscapes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dietz	Victoria	Washakie County Conservation District	WY	1000	3	Vegetation	WCCD recognizes that there is opportunity for improvement in the factoring in of surface disturbance activities and the direct correlation to allocated AUMs. Activities as such, mining, oil, and gas directly impact vegetation and overall land health. It is critical that on the ground conditions are acknowledged and accurately reflect the vegetative loss or gain as results of surface disturbing activities and accurately correlate to changes in allocated AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	21	Vegetation	These new papers showing livestock grazing causes cheatgrass expansion - follow on several past papers such as Reisner et al. 2013. The grazing burden on these lands is a serious threat to recovery after the severe project disturbance, on top of levels of habitat degradation and outright habitat destruction that may be taking place elsewhere in the local and regional area. Grazing substantially aggravates weed risk - including cheatgrass infestation risks.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	41	Vegetation	Researchers have hypothesized that moderate grazing and deferment schedules increase cheatgrass abundance (Knapp 1996, Schmelzer et al. 2014). Carter et al. (2014), meanwhile, found that so-called "holistic" grazing systems confer no environmental benefits and harm native bunchgrass sagebrush communities. Inconsistencies in monitoring persist within and among agencies, making it difficult to measure current grazing pressure (Condon & Pyke 2018).

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rathbun	Floyd	FIM Corp	NV	1284	5	Vegetation	Please provide a baseline that characterizes our area prior to the arrival of domestic livestock. It is obvious that a return to the plant communities and rangeland health that existed prior to 1850 would be a really bad idea and BLM employees need to incorporate factual historic descriptions of pre-1850 conditions into grazing management planning. Historic documents in the form of Journals and reports completed by explorers prior to 1850 indicate that our area in the Great Basin was nearly devoid of wildlife to the point that those exploration parties had to eat their horses to stay alive. Details of various reports can be found in the Steward Indian Museum in Carson City as well as on the web site of Naturalist and Rancher Cliff Gardner at www.gardnerfiles.com
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	MORAN	MARY		UT	914	2	Vegetation	Native vegetation is the best at sequestering carbon, at reducing invasion of non-native, fire-prone plants, and at supporting native wildlife species. As a retired vegetation restoration biologist, I know more than most people that native vegetation is very, very difficult to restore once disturbed. A successful site restoration effort requires easily 1000 times the effort, time and cost of that required for a bulldozer to scrape the same acreage free of natives. So the BLM should never, ever remove good native stands in order to improve grazing conditions
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Withroder	Amanda	Wyoming Game and Fish Department	WY	1014	7	Vegetation	Flexibility in grazing schedules and stocking rates should be considered when attempting to manage invasive species, including cheatgrass. However, it is also important that native, perennial forages (herbaceous and woody) are also emphasized, particularly during the growing season. In many BLM pastures and allotments, infrastructure is lacking to conduct targeted grazing. In the case of invasive annual grasses, targeted grazing by itself has not proven to be an effective means of long-term control. However, used in conjunction with properly timed and applied herbicides, grazing can be an effective tool to reduce plant matter that may intercept herbicide prior to herbicide treatment. Carefully planned livestock grazing management can prolong the benefits of herbicide applications by providing adequate recovery periods during the growing season to allow for native, perennial vegetation re-establishment and will allow for native vegetation to naturally outcompete invasives in the future.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	12	Vegetation	Comprehensive current cheat/medusahead mapping must be conducted - applying various percentages. Mapping of actual vegetation present on the land, not "modeled" veg derived from ecosites or other models must be applied as well.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lally	Meghan	Salisbury Livestock Company		1119	8	Vegetation	Cheat grass is becoming a problem on many permits. This needs to be addressed immediately. The most effective methods need to be used to address the problem.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Thompson	Troy	Wyoming County Commissioners Association	WY	881	7	Vegetation	BLM should consider revising the grazing regulations to permit the use of grazing to address invasive plants. Livestock grazing on public lands can be utilized to reduce invasive and noxious plants, such as cheatgrass. Cheatgrass is a growing problem throughout the American West, outcompeting important forage for livestock and wildlife and increasing the risk of fire by adding to fuel loads. Under the right circumstances, livestock will graze cheatgrass and other noxious plants to reduce the chances of them proliferating and spreading. BLM grazing regulations should allow flexibility to use grazing as a tool to reduce noxious and invasive plants on public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Curtis	Elko County	NV	905	5	Vegetation	Because of the fluctuating nature of rainfall cycles, which changes the growing season of invasive annual grasses, it is proper and necessary for targeted grazing treatments to take place outside the normal bounds of a ten year grazing permit, and a firm date should not be placed on these treatments until the permittee and range cons have had a chance to develop a plan. Based on the above information, Elko County recommends that the BLM examine targeted grazing's projected impact on invasive annual grasses, as well as the requirement that these treatments take place outside the normal ten year permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nagel	Clinton	Gallatin Wildlife Association	MT	949	2	Vegetation	2. more references available in this regard. It has to be recognized that the problems of invasive plants extend from past actions of poor and improper land-use management. It is not wildlife that has increased the invasive species of exotic plants, it is not the natural condition that has done so, but it has been the direct and indirect actions of man. An honest assessment must be made. In that regard, I would like BLM to refer the comments of a fellow retired BLM employee, Roger Rosentreter, PhD dated August 5, 2019. These comments were written in addressing BLM Draft Programmatic EIS for Fuel Breaks in the Great Basin. He acknowledges the problems that BLM has made in its handling of cheatgrass and other exotic species. "Livestock promotes cheatgrass by selectively grazing native bunchgrasses. Great Basin native bunchgrasses evolved without large herds of grazing animals like bison (Novack and Mack 2001). Thus, these native bunchgrasses have few adaptations for resisting grazing pressure and are slow to recover from grazing. By selectively and preferentially grazing the native grasses, livestock gives cheatgrass a competitive advantage."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nagel	Clinton	Gallatin Wildlife Association	MT	949	10	Vegetation	10. preventing any more destruction to native vegetation, period. Rather it be by livestock grazing, heavy equipment, or fire prevention, BLM needs to look at the fragility of native species, especially during times of drought or climate change.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Depoali	Ed			1420	3	Vegetation	1. Repeated frequent fire occurrence, coupled with dominating invasive species are now common. This condition was not prevalent 95 years ago. * On certain rangeland, invasive species have replaced natives, yet management continues based on conditions that no longer exist.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Depoali	Ed			1420	2	Vegetation	1. Repeated frequent fire occurrence, coupled with dominating invasive species are now common. This condition was not prevalent 95 years ago. * On certain rangeland, invasive species have replaced natives, yet management continues based on conditions that no longer exist.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Oja	Wes	Hal & Hall Inc.	MT	1123	1	Vegetation	* Pine tree/juniper encroachment continues to worsen. Either the BLM needs to address it or let the permittees address the situation. This comment is applicable from New Mexico to Oregon to eastern Montana
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klitz	Karen			1449	2	Vegetation	CHEATGRASS - Cheatgrass invasions are created and maintained by disturbance, and the vast area of disturbance over the millions of acres of public land in the west is due to grazing. Continued disturbance keeps giving cheatgrass the advantage over native bunchgrasses, no matter what season it is grazed. If livestock grazing does remove nearly all vegetation down to dirt over hundreds of acres, the fire will go out - is that the habitat you are protecting? If the goal is to.conserve an d restore resistance of sag e steppe, manager should. consider maintaining or restoring: (i) high bunchgrass cover and structure characterized by spatially dispersed bunchgrasses and small gaps between them; (ii) a diverse assemblage of bunchgrass species to maximize competitive interactions with B. tectorum in time and space; and (iii) biological soil crusts to limit B. tectorum establishment. Passive restoration by reducing cumulative cattle grazing may be one of the most effective means of achieving these three goals [Reisner et al. 2013]. Reisner, Michael D., James B. Grace, David A. Pyke and Paul S. Doescher. 2013. Conditions favouring Bromus tectorum dominance of endangered sagebrush steppe ecosystems. Journal of Applied Ecology.
Wetlands and Floodplains								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jauhola	Christine		CO	1254	4	Wetlands and Floodplains	What are the potential impacts to riparian areas from proposed changes in livestock grazing permitting and realistic monitoring levels in the revised regulations?
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	12	Wetlands and Floodplains	The rules should take to heart current policy requiring agencies to avoid actions that would slow attainment of aquatic objectives

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	11	Wetlands and Floodplains	The rules should help meet the goals of the Clean Water Act (and FLPMA) by protecting springs, streams, and wetlands from the impacts of livestock (and restoration of areas already degraded) are of utmost important because they represent a small subset of the landscape, they provide disproportionately important ecosystem services, and they suffer disproportionate adverse impact from livestock grazing. The adverse effects of livestock on water quality are well documented. Lindsey Myers, Brenda Whited. 2012. The Impact of Cattle Grazing in High Elevation Sierra Nevada Mountain Meadows over Widely Variable Annual Climatic Conditions. Journal of Environmental Protection, 2012, 3, 823- 837. doi:10.4236/jep.2012.328097. http://www.scirp.org/journal/PaperInformation.aspx?paperID=21784 .
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	10	Wetlands and Floodplains	The rules should help avoid and minimize adverse impacts on sensitive areas. Livestock are naturally prone to cause adverse impacts because they spend a disproportionate amount of time in sensitive areas such as meadows, wetlands, and riparian areas. Livestock don't move when we want them to. It takes significant resources to ensure that range conditions are monitored and livestock are moved. If the agency and the permittee fail to commit necessary resources for range monitoring and moving animals, livestock grazing should be terminated. UNAUTHORIZED GRAZING: Actions Needed to Improve Tracking and Deterrence Efforts. GAO-16-559: Published: Jul 7, 2016. http://www.gao.gov/assets/680/678292.pdf
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	14	Wetlands and Floodplains	The Range Science profession does not support the BLM's program to assess "proper functioning condition" on riparian areas because the BLM - PFC program is a qualitative assessment process that doesn't actually assess the "functioning condition" of anything.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	21	Wetlands and Floodplains	The BLM also needs to better recognize the effect of wildlife, drought and human uses in riparian areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	32	Wetlands and Floodplains	Require the EIS include scientifically substantiated research regarding livestock grazing as the reason that the majority of riparian areas (green areas along waterway) are impaired and not functioning. These riparian areas are used by 70-80% of all wildlife species at some time in their life cycle, so their loss or degradation has serious ecological consequences.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Milton	Mimsi		CO	478	2	Wetlands and Floodplains	In addition, grazing damages stream and river banks, polluting waterways and harming aquatic life.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	13	Wetlands and Floodplains	important public policy objectives near streams include protection of beneficial uses of water, conserving ESA listed fish & wildlife, avoiding future listings by maintaining viable populations of native species, and meeting treaty obligations related to fish & wildlife. In most cases this will require excluding livestock from sensitive meadows and streamside areas. Livestock conflicts with water quality goals are highlighted by recent research showing that E. coli bacteria from livestock can survive in stream sediments for months. Anne Perry 2011. E. coli: Alive and Well, Probably in a Streambed Near You. Agricultural Research l July 2011. http://www.ars.usda.gov/is/AR/archive/jul11/Ecoli0711.pdf .
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kuhnert	Bob		CO	942	1	Wetlands and Floodplains	I have observed much damage to streams, Meadows, springs, even barren desert flats, barren because of grazing and overgrazing. I currently live in Western Colorado and frequently drive over the continental divide into the headwaters of the Rio Grande River. One day not too long ago I saw five dead cows, spread out for about a quarter-mile, laying alongside the the sparkling clear water of the Rio Grande which was not 3 miles from its source at over 12,000 feet in elevation. I've seen cows standing in the middle of streams urinating and defecating into the crystal clear water. I was fishing on fall Creek in the Uncompahgre National Forest one day for wild cutthroat trout, at about 11,000 feet in elevation. it is a Beautiful meandering stream through a high mountain meadow and when I came around one of the many bins in the creek I found a dead sheep floating in the creek. I was hiking in the Prescott national Forest one day in Arizona at about 5000 feet, it was late June and very dry. I knew where a spring was but when I got there, there were a half a dozen cows standing in the brackish red urine and manure colored water. It was no longer a spring but a feedlot looking muddy patch with The brackish water water standing only in the cow tracks.I could give you many more examples of stream erosion, stomped out springs, severe overgrazing, beautiful wildlife habitat along riparian areas that have been destroyed by cows lounging there all summer and destroying the habitat sorely needed by wildlife. in the brackish red urine and manure colored water. It was no longer a spring but a feedlot looking muddy patch with The brackish water water standing only in the cow tracks.I could give you many more examples of stream erosion, stomped out springs, severe overgrazing, beautiful wildlife habitat along riparian areas that have been destroyed by cows lounging there all summer and destroying the habitat sorely needed by wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ocean	David		CA	973	3	Wetlands and Floodplains	I have also seen sensitive riparian areas (both outside and INSIDE wilderness areas) that have been extensively trammed and damaged by herds of cattle that decided to make them their hub of grazing activity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mace	Pat		PA	157	1	Wetlands and Floodplains	Fragile wetlands need protection from grazing cattle who contribute to global warming.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Prier	Jack		NV	1248	2	Wetlands and Floodplains	The riparian zones on the public lands must be better protected from livestock trampling.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Robinson	John	Idaho Conservation League	ID	1341	6	Wetlands and Floodplains	The BLM should use this opportunity to improve the functioning of riparian areas. Riparian areas support critical nesting habitat for migratory songbirds and serve as potential water sources for sagebrush obligate species. Riparian areas should be protected from the potential adverse impacts associated with improper livestock grazing, including vegetation reduction and negative effects from bank trampling. As part of this review, the BLM should consider managing livestock to discourage, deter or exclude livestock that are negatively impacting sensitive riparian areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	23	Wetlands and Floodplains	The BLM must fully analyze the impacts to riparian ecosystems in the EIS. This proposed revision of the grazing regulations should provide the BLM with an opportunity to review how current management is or is not effectively addressing the negative impact of grazing or riparian ecosystems, native riparian vegetation, native aquatic species and native wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Prier	Jack		NV	1248	1	Wetlands and Floodplains	Since most of the BLM is a desert, why are streams not better protected from trampling by huge domesticated herbivores that evolved in riverine systems and seek that riparian zone?
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	10	Wetlands and Floodplains	Riparian areas, which occupy about 2% of the American west but provide essential ecological functions, are particularly vulnerable to domestic livestock grazing. Western riparian ecosystems provide habitat for about one-third of the plant species in the region. In arid regions like the Southwest and the Great Basin, about 60% of all vertebrate species and 70% of all threatened and endangered species are riparian obligates (Poff et al. 2012; Poff et al. 2011). Livestock grazing has and continues to take a significant toll in riparian and aquatic ecological integrity in the west. Livestock spend a disproportionate amount of their time in riparian areas (Ohmart 1996). They can trample banks, damage vegetation, compact soils, and modify channel morphology and fluvial processes (Poff et al 2012; US EPA 1994). Destabilization of stream banks can lead to downcutting and bank retreat, and the lowering of the groundwater table. Grazing in riparian areas also can lead to water contamination and increases in water temperature (US EPA 1994). Fleishner (2010) asserts that livestock grazing is the most widespread and pervasive threat to riparian habitats in the arid west.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Parkinson	Laurie		CO	991	1	Wetlands and Floodplains	Trampled, incised riparian areas with no vegetation to hold stream banks or protect fish as opposed to meandering, shallow and shaded creeks that protect native fish and plants

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Laurie		NM	1374	1	Wetlands and Floodplains	1.Implement ALL GAO recommendations dating back to 1977 including, but not limited to: (1) establish finite goals for riparian-area restoration; and (2) annually measure the progress made to achieve those goals.
Fish and Wildlife								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	43	Fish and Wildlife	These areas too must be identified for restoration actions to expand sensitive species and other habitats, and reduce CWG fire risk and monocultures that are devoid of nearly all native wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rodriguez	Susan		AZ	442	1	Fish and Wildlife	Your job should be to protect our public lands from destruction. Meaning the destruction of our wild animals, including our wild horses and others by grazing domestic cattle instead of what animals are already living in the habitat area that belongs to us.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Turpin	Joan		UT	579	1	Fish and Wildlife	Wildlife counts on these lands for sustanence and habit and livestock destroys the things wildlife needs to survive. Ranchers have options for their charges, wildlife is all but out of options and to allow further degradation of wildlife habitat for cattle, etc. is poor science, poor managment and poor citizenship.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Vincent	Randan		UT	923	5	Fish and Wildlife	When the number of livestock AUMs are reduced due to forage conditions the BLM should be required to ask the wildlife managing agencies to reduce the wildlife population until such time conditions are improved and numbers can be restored. We have been working on a water project on our allotment that would help in high pressure areas that both the wildlife and livestock use. This is year 3 and still do not have a date from the BLM on an approval date to start the project. This project would allow for better management and increase the land health issue that we are managing. I too am a wildlife enthusiast and propose vegetation treatments and other projects that would enhance wildlife habitat. We hope BLM can create regulation to expedite projects that are mutually beneficial to livestock and wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Peeler	Teresa	Rising Storm	CO	15	2	Fish and Wildlife	We have watched wildlife suffer on public lands for the sake of subsidizing private ranchers' livestock. I doubt that this administration will listen to science, history, OR American citizens, but you should know by now that you're helping destroy lands that you were meant to protect. Think of the *billions* of dollars brought in via wildlife tourism every year! Think of the hundreds of thousands of American jobs supported by this tourism! Use that information (readily available from annual reports from NPS) to guide you. We need *more* oversight, not less!

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	38	Fish and Wildlife	Vesper Sparrow. Inhabits short, patchy herbaceous vegetation, low shrub cover bare ground, forbs. Habitat destruction and degradation - frequent fires, in conjunction with invasive grasses, heavy livestock grazing (which increases shrub cover), and poor range conditions created by livestock grazing - including grazing causing expansion of cheatgrass - and grazing during drought increases rates of nest abandonment and failure. Cowbird host. Grazing at continued levels and foreseeably even more harmful use, high stocking, placement of habitat destroying and fragmenting livestock facilities/water haul/salt/supplement under TG, OBG, flexibility, minimal review will all harm this species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	West	Paul		CO	333	2	Fish and Wildlife	Too much public land is being used for grazing, leading to pressures to eradicate predators and ignore degradation of wildlife habitats.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heiken	Doug	Oregon Wild	OR	1346	6	Fish and Wildlife	The rules should require more careful consideration and minimization of adverse impacts of livestock grazing on pollinators. On June 20, 2014, the White House released a "Presidential Memorandum-Creating a Federal Strategy To Promote the Health of Honey Bees and Other Pollinators." https://www.fs.fed.us/wildflowers/pollinators/documents/PresMemoJune2014/Presidentia lMemo-PromoteHealthPollinators.pdf
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Glasenapp	Logan	New Mexico Wilderness Alliance	NM	1040	4	Fish and Wildlife	The presence of livestock can disturb fragile communities of birds, reptiles, amphibians, or any other kind of species that calls these places home. These considerations must remain in the grazing regulations to ensure continued protection of these areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anonymous	Anonymous		PA	381	1	Fish and Wildlife	The grazing land is for all animals not just for cattle. Wildlife have been around longer than livestock have been. There is no right that the cattle take over the grazing land.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	19	Fish and Wildlife	The BLM must analyze any potential impact to bighorn sheep populations as a result of changes to the way that occurrences of unauthorized and trespass grazing are handled.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	31	Fish and Wildlife	Require the EIS include scientifically substantiated research regarding livestock grazing as a source of species endangerment of species in these lands including numerous fish, amphibians, birds and mammals, and the well-known sage grouse.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	34	Fish and Wildlife	Require the EIS include scientifically substantiated research regarding livestock "protection" as the reason for killing native wildlife like coyotes and wolves and bears - on public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Johnson	PhilipB		WY	771	3	Fish and Wildlife	Related to my concern for soil conditions is my experience with Black Tailed Prairie Dogs; they are terrible for the soil in windy areas of the intermountain west. Soil is lost to the wind and winter snow is blown away so that the range is deprived of precious moisture. Other species such as Sage Grouse lose essential cover because prairie dogs destroy the sage brush. Grazing permittees need to be allowed to control prairie dogs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Oja	Wes	Hal & Hall Inc.	MT	1123	2	Fish and Wildlife	Prairie dogs have become a significant issue in southern and southeastern Montana on allotments. With the increase in prairie dogs, there is a marked decrease in multiple use - specifically livestock and wildlife use. Prairie dog towns essentially become a monoculture
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Thorburn	Kim		WA	1408	1	Fish and Wildlife	please include fish and wildlife conservation science in your grazing alternatives. In particular, honor state fish and wildlife agency public trust obligations for wildlife protection, conservation and management. Grazing regulations and management should consider state-listed species and SWAP-identified species of greatest conservation need.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Long	Laura		IL	524	1	Fish and Wildlife	Please do not allow native plants and species to suffer due to irresponsible livestock grazing policies. Our water, land and wildlife are precious and allowing the degradation of our environment is short-sighted and reckless.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bernstein	Abbie		CA	375	1	Fish and Wildlife	Please do *not* set aside more grazing area for cows. We are losing wild space and wild species at a tremendous rate.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	6	Fish and Wildlife	Nearly all sensitive species in the sage and PJ biome require mature and old growth communities and less fragmented habitats, not habitats stripped of mature plants or peppered with habitat fragmenting "treatments" that kill or reduce woody vegetation - and which result in hotter, drier, windier, weedier sites and thus more frequent fires and expanded weed problems.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kirk	Stephan		ID	694	3	Fish and Wildlife	Livestock use of public land should not allow persecution of predators. Turning livestock out without range riders or herders should not be allowed as it is the duty of the livestock owner to protect his investment using non lethal deterrents.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	9	Fish and Wildlife	It also affects wildlife through direct and indirect effects on food resources, alteration of nesting habitat, impeding wildlife movement (e.g., for pronghorn) reduction in cover leading to greater exposure to predation, transmission of disease, and killing of predators (Ammon & Stacey 1997; Walsberg 2005, Fleishner 2010). Fleishner (1994) reports that diverse taxa -- including all vertebrate classes, vascular plants and cyanobacteria -- have been observed to undergo negative effects from livestock grazing, including decreases in population size of individual species and reduction of species richness.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rappaport	Alexandra		NV	269	4	Fish and Wildlife	Increased grazing contributes to climate change and water pollution from cattle manure. It endangers wildlife and disrupts or even destroys their habitat.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Petty	Kevin		AZ	574	1	Fish and Wildlife	In Idaho, you are trying to increase the killing of natural wolves because they are harming unnatural cattle - the same cattle who don't belong there, don't belong in Alaska or on any public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Riffe	Adele		CO	658	1	Fish and Wildlife	In areas where unrestricted grazing is allowed, the wildlife is threatened by the diseases and destruction of habitat. Iconic bighorn sheep are dwindling in numbers due to disease from domestic sheep herds. Elk numbers are dwindling due to destruction and crowding of habitat by domestic cattle herds.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wagoner	Marcie			1118	2	Fish and Wildlife	I do not understand why the BLM will not allow poisoning of prairie dogs on BLM ground. I have been told that it is because you want to allow habitat for burrowing owls. I get that to a point, but the holes would still be there and open for the owls to use, I just want to kill the prairie dogs so they don't make any new holes and tear up any more ground. Aren't you the Bureau of Land Management, do you see what the prairie dogs do to the land, they destroy it until nothing is there but dirt and then move on to destroy even more ground. Often times the dirt patches then come back with nothing but cactus and weeds.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osgood	Pamela		CA	360	1	Fish and Wildlife	I do not support cattle grazing on public to the detriment of wild horses, wolves, wild buffalo or any other wild creatures who deserve to live on our public lands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Middleton	Marcus			1203	1	Fish and Wildlife	I am concerned that proposed revisions to grazing regulations will lead to natural habitat destruction.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dieterich	Michele		MT	650	2	Fish and Wildlife	I am also concerned at the diseases that livestock can bring to wildlife. Domestic sheep have devastated native sheep populations in Montana. I do not understand some of these changes you propose. They don't seem to follow current research and that is disturbing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ayres	Peter		IL	467	2	Fish and Wildlife	I also am extremely unhappy that though the ranchers are allowed to let their cattle roam on these lands, any wolf population that might be in the area, are not allowed to roam free, but are hunted and trapped and destroyed, for just being the animal they are. Better adjustments to allow the wolf population to roam with out harm is needed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Sherri		FL	391	1	Fish and Wildlife	I adamantly oppose the persecution of native wildlife and believe the wild horses should be left alone to perform their important ecological role, especially within Wilderness and our wildest public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cobb	Sandra		OH	476	1	Fish and Wildlife	Grazing is distructive to native plants and animals by removing food sources and trampling of plants.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	37	Fish and Wildlife	Gray Flycatcher. Shrub-steppe, mountain mahogany and juniper. In shrubsteppe, gray flycatchers are associated with tall, dense sagebrush. Manipulation such as chaining or burning of sagebrush and juniper areas is known to eliminate gray flycatchers. This species is also parasitized by the brown-headed cowbird, a nest parasite whose numbers are increased with the presence of livestock. Habitat fragmentation also likely increases nest parasitism and predation rates. Livestock degrade destroy taller mature and old growth sagebrush that takes many years to recover. See Knick and Connelly, eds. 2011 Studies in Avian Biology. Grazing at continued levels and foreseeably even more harmful use, high stocking, placement of habitat destroying and fragmenting livestock facilities/water haul/salt/supplement under TG, OBG, flexibility, minimal review will all harm this species.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	30	Fish and Wildlife	Further, the BLM should analyze in the EIS how the conservation of beaver can improve rangeland health, especially in the context of a changing climate that is predicting worsening droughts in much of the arid west.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	50	Fish and Wildlife	Further, the BLM must disclose and analyze impacts to the array of species - including listed and other special status species - that occur on or affected by activities conducted on BLM rangelands. In light of the fact that targeted grazing leads to wildlife "winners and losers" the BLM must analyze how the practice would impact the agency's ability to comply with its policy obligations to conserve and recover ESA-listed species and the ecosystems on which they depend [14: As discussed above, see Section 7(a)(1) of the Endangered Species Act.] and to reduce or eliminate threats to Bureau sensitive species.[15: See BLM Manual 6840.]
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	24	Fish and Wildlife	Fences can impede the migration of big game and other wildlife (Gates et al. 2012; Hanophy 2009; Van Lanen et al. 2017). They also can impact the behavior and populations dynamics of certain species including those in danger of extinction (e.g., greater sage grouse).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carney	Cheryl		TX	179	4	Fish and Wildlife	Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Spotts	Richard		UT	1235	8	Fish and Wildlife	Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. * Ensure grazing management does not impede grazed lands from serving as habitat for native predators. * Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frazier	Maggie		NY	464	3	Fish and Wildlife	Due to this program, mandatory provisions to protect sage-grouse are being gutted

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Gene		UT	806	2	Fish and Wildlife	Control and Management of Wildlife A. Work with the permittee and/or the DWR to control and maintain antelope and deer numbers. Over the past 30 years the antelope numbers have grown to over 1,000+ head and deer numbers are around 300 head. Thirty years ago antelope numbers were approximately 2-300 and deer +\50 head grazing year round. The excessive number of wildlife graze year round depletes the permittees forage and causes over grazing to the allotment. We have not had cooperation from either the BLM or DWR in helping control overgrazing and over population of wildlife numbers. B. We have never been compensated for the depletion of our forage and loss of forage due to excessive deer and antelope numbers on our Permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Grabell	Barbara		OR	688	1	Fish and Wildlife	Consideration of apex predators must be considered in granting grazing allotment permits on public lands going forward. Credible science (not beholden to specific interests or groups) has proven (a) their value to the ecosystems in which they live & (b) the remminute numbers of verifiable depredations of domestic livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kofler	Roger		OR	174	1	Fish and Wildlife	Cattle grazing can quickly turn a water hole into a useless manure hole and leave the native annals and birds without water. Cattle trample the native plants and leave the native birds and animals without habitat, which is vital to their survival.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Garcia	Christine		TN	596	1	Fish and Wildlife	Cattle do not need more land to graze on. There is already plenty for them. It is destructive for native plants and animals
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ocean	David		CA	973	4	Fish and Wildlife	Cattle do not necessarily wander much when they find a satisfying, bucolic location to feed, drink and rest, so an idyllic location can quickly become an unrecognizable disaster. Additionally, I have seen grazing in grouse habitat that - again - greatly diminished the viability of that habitat for wildlife, specifically for the grouse.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	11	Fish and Wildlife	BLM must take a hard look at the scale of habitat impacts (including increasing intentional losses from BLM, USFS, state and private lands veg treatments) to understand the need for much more protective management actions, and to fully look at how all of these Reg changes to benefit the livestock industry will not to preserve species and will lead to further declines, extirpation and extinction.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	4	Fish and Wildlife	BLM must consider the many and acute impacts of grazing management on species and native ecosystems. The proposed regulations might include specific quantitative triggers for when changes in management are required to address habitat degradation caused by past and present grazing practices. Restoration actions should follow the best available science and be implemented with the primary purpose of improving the ecological function of native ecosystems and providing for climate-resilient habitats.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	17	Fish and Wildlife	The public notice for these proposed regulations indicates that BLM will be using livestock grazing to "improve rangeland condition."19 The animal agriculture industry, left to its own self-regulation, has an inherent conflict of interest and is undependable to effectuate protections to our public land's vulnerable ecosystems. BLM should take into account all possible effects of increasing livestock grazing on wildlife and critical habitats. 19 Notice of Intent to Prepare an Environmental Impact Statement for the Proposed Revisions of grazing Regulations for Public Lands, 85 Fed. Reg. 3410, 3411 (Jan. 21, 2020).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	11	Fish and Wildlife	Section 4180.2 (E)(7- 11) Topic Standards and Guidelines Comment/Observation (7) does not address fish. (8) does not address assisting in the precluding of species to be listed. (9) does not recognize State Species of Greatest Conservation Need. (10) does not include desirable species (e.g., sport fish). (11) does not include desirable species. Action Requested Action: (7) Restoring, maintaining, or enhancing habitat should include both fish and wildlife species; (8) Should also include - to assist in both recovery and/or lending to the precluding of species from being listed; (9) Should include State Species of Greatest Conservation Need; (10,11) Should include both native and desirable species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	13	Fish and Wildlife	Section 4180.2 Topic Standards and guidelines for grazing administration Comment/Observation Guidelines do not address livestock disease management and the effects to wildlife. Rangeland health assessments should consider the potential for livestock to transmit diseases to native ungulates; for example bighorn sheep in Arizona. Methods to reduce livestock escaping grazing areas and when livestock are moved from site to site should be included to support healthy biotic populations and communities. Action Requested Action: Analyze and address livestock disease management and the effects to wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	23	Fish and Wildlife	Poessel et al. 2019 describe the very significant benefits of removing cattle for recovery of native vegetation communities and associated bird diversity. Removal of cattle grazing correlates with increases in vegetation productivity and in abundance of imperiled breeding birds Sharon A. Poessela, Joan C. Hagarb, Patricia K. Haggertyb, Todd E. Katznera
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dieterich	Michele		MT	650	5	Fish and Wildlife	Poessel et al 2020 (attached) shows that bird species diversity increased after grazing was removed from areas. Abundance increased by 23% during the first 12 years and remained consistent for the next 12. They also discovered that nest parasites and competitors declined. We should rethink grazing on public lands. Our birds are part of the national trust and protected by the Migratory Bird Act despite the executive order.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Arleen		CO	651	1	Fish and Wildlife	I'm especially concerned with the bighorn sheep that contract a pulmonary disease when in close proximiting to domestic sheep. This is a fatal ailment and is reducing the population.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	James	Alison		CT	5	1	Fish and Wildlife	From your explanation and from deregulation, all I can see willbe an increase in Sheep and Cattle on public land which would compete forresources with wildlife. Would this not mean that the revenue gained from hunting permits decrease because less resources for wildlife to procreate
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	16	Fish and Wildlife	Forest and grassland inhabiting birds are one of bird groups documented as suffering the steepest declines. BLM must fully consider the full spectrum of adverse ecological impacts of the very significant grazing burden on sensitive species and migratory birds (including the use of habitat for birds "refueling" on during energy-consuming migration). The proposed revisions would make matters worse. This process must fully examine the relative scarcity of this habitat at the local and regional level, and the effects grazing degradation and habitat harms, along with BLM vegetation treatments, and energy and other development may have on population viability and persistence of avian species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Erma		NY	113	7	Fish and Wildlife	Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Erma		NY	113	6	Fish and Wildlife	Ensure grazing management does not impede grazed lands from serving as habitat for native predators.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Black	Georgia	Reese River Valley, LLC	NV	1282	27	Fish and Wildlife	Carrying capacity: The phrase "carrying capacity" should be changed to "Domestic livestock carrying capacity" and be defined as: Domestic livestock carrying capacity is a quantifiable number of Animal Unit Months as determined by rangeland studies on a sustainable yield basis that will not induce damage to vegetation or related resources. Domestic livestock carrying capacity should refer to only the forage appropriated to livestock not total forage availability. Distinction must be made between livestock forage and forage appropriated to wildlife, wild horses and burros, and other conservation purposes in order to comply with the Bureau's multiple-use mandate. This will allow BLM to better determine the causal factors of adverse range conditions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	9	Fish and Wildlife	We urge the BLM to change its regulations so that the diversity of plant and animal life found on public lands is improved and benefited. A.Allow for grazing permit retirement and long-term non-use for conservation purposes. B.Ensure that grazing management preserves the habitat value of grazed lands for native plan and wildlife species. C.Manage grazing lands to benefit ALL wildlife, including native predators. Elimination of predators to benefit livestock growers needs to stop. The impacts of predator control should be assessed on at least a regional basis, or even better a national basis, rather than state by state. D.Eliminate the destruction of native vegetation to increase forage for livestock. E.Use only native species in land restoration efforts.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	10	Fish and Wildlife	We also request that the BLM provide an analysis of the impacts of intensive livestock grazing, "to protect high-quality wildlife habitat from wildfire." To the extent that livestock are being used to remove vegetation, that itself would seem to reduce the quality of the habitat and biological community that is already being described as "high-quality."
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	9	Fish and Wildlife	The intensified grazing, high and/or increased stocking use, and severity of "fuels" and other grazing disturbance actions proposed under TG, OBG, Flexibility, etc. will result in extensive permittee road use (water hauling, supplement feeding etc.). The full and current road characteristics and road footprint, foreseeable road "improvement" and road footprint expansion, road use and footprint expansion weed infestation risk, road use and footprint expansion harms to sensitive and other wildlife species habitat must be critically examined.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	44	Fish and Wildlife	Related to using grazing to improve wildlife habitat, the scientific literature shows that grazing may benefit some species (often generalists) and disadvantage others (Ohmart 1996; Krueper et al. 1993; Fleischner 2010). In other words, managing wildlife with domestic grazing is an exercise in picking wildlife winners and losers and not helpful in advancing natural ecosystem composition, process, and function and biodiversity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rathbun	Floyd	FIM Corp	NV	1284	1	Fish and Wildlife	Please include in your NEPA analysis the fact that there are many benefits provided by livestock grazing within the BLM regulated rangelands. Those benefits include the greatly increased numbers of wildlife of all kinds within the grazed areas that do not thrive in the ungrazed areas; vegetation productivity increases with grazing; water yield from watershed areas increases and improves the recharge of groundwater aquifers; water developments for livestock benefits wildlife directly; predator control for livestock protection also protects wildlife
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	13	Fish and Wildlife	Note that TG, OBG, flexibility and other proposals for lax grazing often involve modifying seasons of use. We strongly oppose modifying seasons of use that would lead to grazing in breeding/nesting/birthing/young rearing and wintering habitats for wildlife. BLM must act to remove and reduce grazing disturbance during this period. Where do existing seasons of grazing use overlap nesting, birthing, wintering and other very stressful periods for native wildlife currently? The revisions would increase conflicts - disturb wildlife, increase presence of nest/egg/young predators by imposing livestock disturbance, increase livestock trampling of redds/egg masses in aquatic species habitats, etc.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	18	Fish and Wildlife	Livestock interactions with wildlife can be harmful to wildlife. As one example, cattle can have significantly adverse impacts on aquatic wildlife. One expert notes, "As livestock graze along riparian corridors, their heavy hooves erode and compact the soil, and also increase the width of streams by flattening riverbanks. Livestock are also associated with higher nutrient concentrations, higher water temperatures, lower macroinvertebrate abundance, and a decline in overhanging vegetation and shrub cover, all of which can be detrimental to salmon. Animals that graze in streams during salmon spawning season may trample redds or stir up silt that can fill the spaces between gravel and suffocate salmon eggs (a process called infilling). On the flip side, removing or excluding cattle from river areas can improve salmonid habitat and populations."20 20 Surf and Turf, FISHBIO (July 12, 2013), https://fishbio.com/field-notes/conservation/surf-and-turf .

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Withroder	Amanda	Wyoming Game and Fish Department	WY	1014	1	Fish and Wildlife	Further clarification is needed on the definiti on of a crossing authori zation (time period of when, numbers of livestock). Specifically, when would trailing through or crossing BLM lands be authorized. Certain habitats and specific times of the year are critical for wildlife and authorizations may create conflicts between wildlife and livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	James	Montana Wool Growers Association	MT	716	22	Fish and Wildlife	Finally, MWGA's membership has concerns about BLM's desire to manage bighorn sheep and domestic sheep for temporal and spatial separation to the extent, if any, that such separation will be used as a pretext for removing domestic sheep from grazing allotments. As the science indicates, big horn sheep are known to develop pneumonia in instances where there are no domestic sheep present and where there has been no interaction between bighorn sheep and domestic sheep. The BLM should not remove sheep producers from their current allotments merely because bighorn sheep may be present currently or at some future time. The science as to bighorn sheepdomestic sheep transmission is not settled; and the MWGA encourages the BLM to take these factors into consideration when developing individual RMPs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Erma		NY	113	5	Fish and Wildlife	Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	7	Fish and Wildlife	BLM's analysis should assess and describe how proposed regulations might support conservation of agency-designated "sensitive species," including how future planning under the proposed new rule would comply with sensitive species policy. See BLM Manual 6840.2B (2008). BLM should also analyze how proposed regulations would affect conservation of state- identified Species of Conservation Need and implementation of state Comprehensive Wildlife Conservation Strategies (i.e., State Wildlife Action Plans) in recognition of the extensive federal and state investment in state sensitive species management and the BLM's commitment to supporting these wildlife partnerships.3 3 Bureau of Land Management, "Partnerships," https://www.blm.gov/programs/fish-and-wildlife/wildlife/partnerships ("The BLM works with many partners on habitat conservation and restoration. This includes working with state wildlife agencies in implementing their State Wildlife Action Plans (also known as Comprehensive Wildlife Conservation Strategies) in land- use and conservation planning on BLM-managed lands. Each state's plan identifies priority wildlife species and habitats, addresses threats to their survival, and identifies long-term conservation actions needed in the state, including those on BLM-managed lands. The strategies provide a solid foundation for furthering wildlife conservation and an opportunity for the states, federal agencies and other conservation partners to address their individual and coordinated roles in conservation efforts.").

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	8	Fish and Wildlife	BLM post-fire Emergency Stabilization (ESR) and rehab have been a major failure for wildlife. See Arkle et al. 2014. Instead of finding ways to increase grazing stress on public lands by creating newer and bigger weed wastelands and causing species declines and extirpations under TG, OBG, loosened FRH process, and cutting public voices out of public lands processes, BLM must emphasize identification significant areas of burned lands for effective native species and wildlife habitat restoration, and not killing sage/trees- but re-establishing sage/shrubs trees and removing grazing disturbance by amending the grazing regulations to end grazing in newly rehabbed/restored areas.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	10	Fish and Wildlife	BLM must identify the full range of threats to sensitive and important wildlife species and migratory bird habitats and populations from all of the proposed Reg changes, and must fully take into account the harmful indirect and cumulative impacts on species habitats and populations from the huge number of vegetation "treatments" (often based on flawed models) being conducted across public lands - where woody vegetation is being destroyed to try to eke out more AUMs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Culver	Nada	National Audubon Society	ND	1294	1	Fish and Wildlife	According to a recently released report from the Cornell Lab of Ornithology (Rosenberg 2019), grassland birds are showing the greatest population declines among the entire avifauna of North America. Since 1970 the number of grassland birds in North America has declined by over 720 million, a reduction of approximately 53% overall, with some species declining by over 90%. If these catastrophic losses continue, extinction of many of the most vulnerable species is likely to occur by the end of this century. Action must be taken immediately to prevent further population loss of species and to avoid the impacts to livestock producers and farmers that would come with Endangered Species Act protection that would be warranted for these species if current trends continue.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	1	Fish and Wildlife	A study headed by the Cornell Lab of Ornithology revealed that bird populations have dropped by 29% since 1970 in the US and Canada, including common species like sparrows, warblers and finches. Grassland birds in particular were hit hard with a 53% reduction in population. A good part of that loss is due to the inability of landscapes to support bird populations (Science, Oct. 4, 2019, Vol. 366, Issue 6461, P. 120- 124). BLM lands provide habitat for many bird species, and it is imperative that grazing on these lands be regulated to preserve the habitat value for native birds.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nagel	Clinton	Gallatin Wildlife Association	MT	949	6	Fish and Wildlife	6. management practices that preserve the habitat for native plants and wildlife. Grazing regulations must not be used that would favor domestic livestock in lieu of the native species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	France	Tom	National Wildlife Federation		1237	8	Fish and Wildlife	6) Bighorn Sheep and Domestic Sheep and Goats - The risks of pathogen transmission and all-age die-offs in wild sheep herds, is exceptionally well documents in the literature. We would recommend that BLM consult: Wild Sheep Working Group. 2012. Recommendations for domestic sheep and goat management in wild sheep habitat. Western Association of Fish and Wildlife Agencies. https://www.wafwa.org/committeesgroups/wild_sheep_working_group/ NWF requests that the effects analysis in the EIS specifically address the impacts and effects of the proposed changes in grazing regulations on BLM's ability to effectively manage the risk of contact between domestic and wild sheep on and within 20 miles of BLM domestic sheep grazing allotments

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	19	Fish and Wildlife	Fish are not alone in being negatively impacted by grazing of domesticated livestock. Oregon Public Broadcasting also observes, "Bighorn sheep (Ovis canadensis) can catch a bacteria, Mycoplasma ovipneumoniae, from domestic sheep that causes pneumonia in the wild sheep and, often, death. Researchers noted a correlation between the introduction of domestic sheep and the rapid disappearance of bighorn sheep as early as 1928 and pneumonia remains a significant problem for the wild species today... 11 studies published between 1979 and 2009 found 98 percent of bighorn sheep that mixed with domestic sheep died of pneumonia."21 21 Melissa Gaskill, Bighorn Sheep Have a Problem with Their Domestic Relatives, PUB. BROAD. SERV.: NATURE (Dec. 11, 2018), https://www.pbs.org/wnet/nature/blog/bighorn-sheep-have-a-problem-with-their-domesticrelatives/ .
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	20	Fish and Wildlife	As social creatures, sheep are prone to wander and intermingle with one another. Melissa Cain of Western Watersheds Project notes "There are thousands of domestic sheep on public land grazing allotments, and one herder can't keep up with all of them [.]"22 The harm to wildlife from grazing without appropriate regulation and restriction is demonstrable and articulable. Increasing grazing on public lands reduces the viability of critical wildlife habitat. These impacts are made worse by a lack of reasonable regulation and enforcement of grazing. It is a logical fallacy to assume that land free of human industry does not generate value.23 The value of space unspoiled by human profiteering continues to increase and provides an essential refuge for non-human animals. 22 Id. 23 Protected Areas in Today's World: Their Values and Benefits for the Welfare of the Planet, SECRETARIAT OF THE CONVENTION ON BIOLOGICAL DIVERSITY, https://www.cbd.int/doc/publications/cbd-ts-36-en.pdf
Special Status Species								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	30	Special Status Species	Sage Thrasher. Habitat destruction, degradation and fragmentation are threats, including activities that destroy shrub cover (fire (pile burning associated with deforestation will cause collateral damage and cheatgrass invasion) and harm local populations. Although authors note that livestock grazing may increase shrubs, livestock grazing also alters and simplifies shrub structure, especially that of taller sagebrush or other shrubs which are the specific sites where sage thrashers nest. The end result is lollipop like see-through sage providing suboptimal cover for many species. Sage thrashers require mature and old growth taller big sagebrush that takes many years to develop. Grazing degrades and depletes taller mature and old growth sagebrush with high levels of cow use. The very high use limits and stocking, grazing during harmful time periods of time, placement of habitat destroying and fragmenting livestock facilities/water haul/salt/supplement under TG, OBG, flexibility, minimal review-all will attract predators and cowbirds. See Rich 1997, Knick et al. 2003, Knick and Connelly, eds. 2011 Studies in Avian Biology. Also Fite field obs. in project area.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	28	Special Status Species	Sage Sparrow. Particularly associated with big sagebrush or may be found in mixed shrub communities with greater shrub cover, abundant bare ground, sparse grass cover. Shows high site fidelity. Habitat destruction, degradation and fragmentation are chief threats, and are caused by frequent fire, livestock grazing, range "improvements" (shrub treatments, exotic grass plantings) - and these promote other impacts - predation and nest parasitism. Grazing periods and facilities/water haul/salt supplement will degrade and deplete taller mature and old growth sagebrush that takes many years to develop with high levels of cow use, no measurable use limits, chaotic grazing including during harmful time periods of use, placement of habitat destroying and fragmenting livestock facilities that will attract predators and cowbirds. See Knick et al. 2003, Knick and Connelly, eds. 2011 Studies in Avian Biology. Also, Fite field obs. in project area. Presence of livestock during spring periods increases presence of raven nest and egg predators. See Coates et al. 2016.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chew	Scott H.	Chew Livestock, Inc	UT	1491	7	Special Status Species	Sage Grouse; Sage Grouse are another example of where BLM could improve. BLM should be required to do or allow large scale range improvements in Sage Grouse areas. There is a need to have chaining, water projects, allow fires to burn, and utilize livestock grazing to meet the short grass requirements which young Sage Grouse need.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Koch	Ted	North American Grouse Partnership		1124	1	Special Status Species	Our primary concern is that the proposal to use livestock grazing to address fuel loads will lead to reduced native grass cover for prairie chickens, sage grouse, sharp-tailed grouse and other ground-nesting birds.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	35	Special Status Species	Long-Billed Curlew. SENSITIVE. Livestock grazing can be negative if cows trample nests or disturb birds and cause nest abandonment. The project involves extensive nesting period grazing disturbance. Grazing at continued levels and foreseeably even more harmful use, high stocking, placement of habitat destroying and fragmenting livestock facilities/water haul/salt/supplement under TG, OBG, flexibility, minimal review will all harm this species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	29	Special Status Species	Loggerhead Shrike. Shrubsteppe, open woodland, field edges, and occasionally riparian areas. Presence and abundance in shrubsteppe is positively correlated with the diversity, density and height of shrubs. Loggerhead shrikes require tall structurally diverse big sagebrush in the project area and also nest in taller salt desert shrubs in proximity to ARTRW, and extend up through tall dense sage communities and sage-bitterbrush to juniper areas in some sites. (Fite, field obs.). Intensive grazing use breaks and simplifies protective shrub structural complexity. It degrades, depletes and often destroys taller mature and old growth sagebrush/shrubs that take many years to develop. The structural complexity of these shrubs is simplified by high levels of cow use, sky high measurable use limits, grazing during harmful time periods of use, placement of habitat destroying and fragmenting livestock facilities/water haul/salt/supplement (causes extreme cattle damage to sites where they are placed and will also attract predators and cowbirds). Knick et al. 2003, See Knick and Connelly, eds. 2011 Studies in Avian Biology, Coates et al. 2016.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Koch	Ted	North American Grouse Partnership		1124		2 Special Status Species	Livestock grazing can reduce hiding cover, leading to greater losses from predation. Even in areas where grass cover remains in "excellent" condition, it still may provide less cover than is necessary for the survival of some grouse species. Long-term grazing by livestock also might result in the elimination of certain types of grasses that are important components of grassland or shrubland systems-such as native perennial bunchgrasses. This in turn can initiate invasion by cheatgrass. Grazing patterns on our western rangelands during periods when native bunchgrasses undergo their annual reproductive cycle might reduce or eliminate these grasses over land landscapes. Suitable nesting and brood-rearing cover is a limiting factor for grouse in the arid West. Bunchgrasses provide ideal nesting sites primarily because grouse use residual dead or dormant grasses from the previous growing season as nesting materials and locate nest sites adjacent to overhanging vegetation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339		31 Special Status Species	Green-tailed Towhee. In shrubsteppe, its presence and abundance are positively correlated with increased shrub species diversity, shrub cover, and taller shrubs. Threats are habitat destruction and degradation - livestock grazing and frequent fire have impacted shrubs. Simplification of shrub cover results in population reduction or elimination. Green-tailed towhees require taller dense big sagebrush and other shrubs that take long periods of time to develop. Grazing at continued levels and even more harmful use, high stocking, placement of habitat destroying and fragmenting livestock facilities/water haul/salt/supplement under TG, OBG, flexibility, minimal review-will degrade and deplete taller mature and old growth sagebrush with high levels of cow use, no measurable use limits, chaotic grazing including during harmful time periods of use, placement of habitat destroying and fragmenting livestock facilities that will attract predators and cowbirds. Knick et al. 2003, Knick and Connelly, eds. 2011 Studies in Avian Biology. Coates et al. 2016. Also, Fite field obs.in project area.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339		27 Special Status Species	Greater Sage-Grouse. Causes of Declines: Habitat destruction, degradation and fragmentation, altered fire frequency (both lower and higher), livestock grazing, converting shrub-steppe to annual monocultures are Threats. Range "improvements" (fences, water pipelines and troughs), and West Nile virus are threats. BLM has not properly assessed the degree to which grazing degrades and depletes taller mature and old growth sagebrush that takes many years to develop - with adverse impacts from high levels of livestock use; use of excessive non-mandatory measurable use limits especially when areas are grazed during the growing/nesting season, etc. Grazing is imposed during harmful time periods of use increasing GRSG and other sensitive biota predation risk and seriously damaging native veg communities (Mack and Thompson 1982, Anderson et al. BLM Tech Bull on BBWG defoliation). BLM allows wanton placement of habitat destroying and fragmenting livestock facilities and salt/supplement and/or water that will attract predators and cause severe degradation of the native vegetation in the facility/supplement placement site. See Fleischner 1004, Knick et al. 2003, Freilich et al. 2003, Connelly et al. 2004, Knick and Connelly, eds. 2011 Studies in Avian Biology, Coates et al. 2016. See also Salazar Federal Court Order.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	12	Special Status Species	fire suppression (99 percent) in core areas resulted in slightly increased population growth under all precipitation conditions on a median basis, especially for normal and above-average precipitation" (Coates et al. 2015). In light of these studies and these potential effects on sagebrush ecosystems and sagebrush obligates, it is critical that the grazing regulation revisions consider viable ways to utilize grazing as an effective wildfire management tool. As of today, wildfire and invasive species continue to be primary threats to sage-grouse and their habitat in Idaho, as identified in the State of Idaho's Executive Order 2015-04 and the Idaho Sage-grouse Management Plan (Idaho's Plan).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	33	Special Status Species	Ferruginous Hawk. Open areas, isolated trees, and edges of juniper woodlands are used for hunting perches and nesting. "Prey abundance, particularly jackrabbits and ground squirrels, is correlated significantly with the number of breeding pairs in an area and with reproductive success". (Dobkin and Sauder 2004, citing Jasikoff 1982 and Deschant 2001 b) (at 36). Habitat destruction and degradation are greatest threats, and directly influence prey abundance, important to reproductive success. Jackrabbits require mature sagebrush communities, which the project will degrade. Raptors can be particularly sensitive to human disturbance (Dobkin and Sauder at 37). Human disturbance and habitat depletion for prey species is a concern, as are BLM 'treatments" and other management across the region destroying juniper nest sites. Grazing at continued levels and foreseeably even more harmful use, high stocking, placement of habitat destroying and fragmenting livestock facilities/water haul/salt/supplement under TG, OBG, flexibility, minimal review will all harm this species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heard	Tom		TX	969	3	Special Status Species	Ensure NEPA analyses appropriately considers the habitat of species in crisis and the broader extinction crisis underway.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Rama			1191	6	Special Status Species	contributes to the spread of invasive species like cheatgrass and provides the perfect environment for pinyon- juniper encroachment that directly works against a nation-wide effort to increase greater sage-grouse habitat.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	36	Special Status Species	Burrowing Owl. Requires low vegetation and a suitable nest burrow. Owls may use other species burrows, but do not dig their own. Excavation by ground squirrels, marmots and badgers is important in nest burrow availability. Threats are habitat degradation and destruction, and shrub-steppe degradation. Pesticides can reduce populations of insect prey and fossorial mammals (and degraded habitats may result in very high numbers of grasshoppers/Mormon crickets, and thus calls for insecticide spraying). Badgers, coyotes, birds of prey and vehicle collisions may also be problems. Large herds of livestock and facilities/activities during nesting periods, and water hauling or intensive grazing schemes may result in intensified risk of vehicle collisions. Grazing at continued levels and foreseeably even more harmful use, high stocking, placement of habitat destroying and fragmenting livestock facilities/water haul/salt/supplement under TG, OBG, flexibility, minimal review will all harm this species.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	32	Special Status Species	Brewer's Sparrow. Its presence is positively correlated with total shrub cover, bare ground, taller shrubs, patch size, and habitat heterogeneity - and negatively correlated with grass and salt shrub cover. Large population declines have occurred in the Columbia Plateau and Great Basin. It is a cowbird host. Threats include habitat destruction and degradation. Activities that destroy shrub cover include fire, chaining, herbicide use, etc. This species is also a cowbird host. It has a positive response to increased shrubs - see previous comments about shrub structure and negative responses to grazing, which reduces and simplifies shrub structure. Grazing degrades and depletes taller mature and old growth sagebrush that takes many years to develop - due to high levels of cow use, no measurable use limits, chaotic grazing including during harmful time periods of use, placement of habitat destroying and fragmenting livestock facilities will attract predators and cowbirds. Grazing at continued levels and foreseeably even more harmful use, high stocking, placement of habitat destroying and fragmenting livestock facilities/water haul/salt/supplement under TG, OBG, flexibility, minimal review will all harm this species. See Knick et al. 2003, Knick and Connelly, eds. 2011 Studies in Avian Biology. Coates etal. 2016. Also, Fite field obs. in project area.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	42	Special Status Species	The infrastructure of watering systems and barbed-wire fencing needed to manage large herds of cattle in the high desert also fragment and destroy sagebrush habitat, artificially concentrating cattle in important sage-grouse habitat areas, dewatering natural springs and water courses, and creating thousands of potential breeding grounds for West Nile virus-carrying mosquitoes as water stagnates in reservoirs, troughs, and even cattle hoof prints (Walker & Naugle 2011). See also 75 Fed. Reg. at 13,941. The virus is 100% fatal to sage-grouse (Walker & Naugle 2011). See also 75 Fed. Reg. at 13,941, 13,967-68. Structures such as fences also can inhibit or destroy genetic connectivity between populations. Water collected in livestock reservoirs and troughs-and even in cattle hoof prints-acts as mosquito breeding grounds, facilitating the spread of West Nile virus (Knick & Hanser 2011). Individual mosquitoes carrying the virus can fly more than 11 miles from these water sources (Walker & Naugle 2011, USFWS 2010). Sage-grouse experience 100% mortality when exposed to West Nile virus (USFWS 2010). The virus is capable of extirpating a local sage-grouse population following a single outbreak (Walker & Naugle 2011). West Nile also sickens and/or kills migratory birds including several sensitive species at risk here.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	10	Special Status Species	Section 4180.2(d)(4)(5) Topic Standards and Guidelines Comment/Observation "(d)(4)(5) includes special status species....habitat quality for native plants and animals." Does not include the state species and does not address quantity of habitat. Action Requested Action: The State Species of Greatest Conservation Need should also be recognized. In addition, the quantity of native plants, fish and wildlife habitat should be addressed.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339	44	Special Status Species	REISNER Dissertation and Reisner et al. 2013 CHEATGRASS AND GRAZING EXCERPTS Demonstrating Grazing Harms to Sagebrush Ecosystems See also Reisner et al. 2013. http://onlinelibrary.wiley.com/doi/10.1111/1365-2664.12097/abstract Conditions favouring Bromus tectorum dominance of endangered sagebrush steppe ecosystems The following excerpts are from the Reisner dissertation on which the article is based. We are including them here because they provide additional information and scientific references related to the great threat livestock grazing poses to sage-grouse habitats.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	9	Special Status Species	In most applications, targeted grazing has occurred on degraded sites with low resistance to invasion of exotics and had existing high cover of exotic annual grass-that is, sites considered by many to have little ecological value to lose[18] A number of limitations make targeted grazing normally impractical if negative effects are to be avoided. Grazing in the winter to reduce fuel loading of grass by 80%[19] is likely to lead to a loss of native perennial grass canopy cover over the specified height essential for sage grouse nesting and brooding. Target grazing often relies on the assumption that regrowth will replace native grasses grazed intensely early in the season. In arid areas, such regrowth has been found to be rare and unlikely[20].
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	9	Special Status Species	4180.1 (d) Topic Fundamentals of Rangeland Health Comment/Observation "(d) Habitats are, or are making significant progress toward being, restored or maintained for Federal threatened and endangered species, Federal proposed candidate threatened and endangered species, and other special status species." Paragraph does not consider State species of concern. Action Requested Action: (d) should also include maintaining and restoring habitats for State Species of Greatest Conservation Need (SGCN) as identified in Arizona's State Wildlife Action Plan.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schenbeck	Greg	The Wildlife Society	NE	1485	1	Special Status Species	Therefore, SDTWS requests that the EIS provide background information on the progress made to date in implementing the vegetation and habitat management direction in the 2015 sage grouse amendment to the SD Resource Management Plan. We contend that this type of information is needed for each of the 15 SLM sage-grouse amendments to provide a basis for the interested public to fully and accurately assess the potential impacts of the revised grazing regul ations on sage-grouse and the sagebrush ecosystem. We also recommend that the EIS disclose how and to what extent changes in the grazing regulations under each alternative would affect BLM's ability to implement the vegetation and habitat management provisions in the sage grouse amendment and other agency directives for intact and fragmented sagebrush steppe habitats. Effective and timely implementation of the conservation measures in the 2015 amendment is especially critical given the added risk of West Nile virus on low-elevation greater sage-grouse populations like those occurring in northwestern SD (Kaczor 2008, K.C. Jensen as cited in ftaKe et a!. 2010). Due to West Nile and other factors, the sage-grouse hunting season has been closed since 2013 in SD with only one year open in 2016 and an extremely limited harvest allowance in only two counties. Hunting seasons were closed because the annual population status was below objective (South Dakota Department of Game, Fish and Parks 2014b).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rhoads	Dean	Rhoads Ranch		1165	6	Special Status Species	The wolves and grizzly bears should be immediately delisted under the Endangered Species Act. Their management should be returned to state governments. They are a huge threat and danger to domestic livestock as well as wildlife.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Koch	Ted	North American Grouse Partnership		1124		3 Special Status Species	The welfare of grouse populations is increasingly compromised by the establishment of species not native to ecosystems in which grouse occur, and by the unnaturally increased abundance of some species owing mostly to human-induced changes to the environment. These invasive species range from exotic grasses and weeds that degrade and in some cases replace natural plant communities, to the increased abundance of natural predators such as ravens, raccoons, and foxes. Overgrazing is a primary cause of invasive plant establishment. NAGP supports a vigorous national effort to counteract the influences of these species by eradication or reduction in their numbers, thereby restoring the natural biodiversity and integrity of the ecosystems on which native grouse depend for their long-term viability as species.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204		13 Special Status Species	The ESA also requires federal agencies to carry out programs for the conservation of listed species. 16 U.S. Code §?1536(a)(2). This means that BLM must not only ensure that its actions do not jeopardize the continued existence of listed species or adversely modify critical habitat but that it also must take affirmative steps to recover and conserve listed species. BLM must ensure that its livestock grazing regulations are consistent with both Sections 7(a)(1) and 7(a)(2) of the ESA.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rhoads	Dean	Rhoads Ranch		1165		4 Special Status Species	The BLM needs to let the states manage the Sage Grouse Management Plan that has been successful in that state, as each state is different and has different needs. The NRCS has been very helpful in this program. The fires have greatly affected these birds in many areas by burning their habitat and feed. Also the coyotes, eagles, ravens, and crows have killed many of the young birds. The Sage Grouse cohabitate with cattle just fine.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204		12 Special Status Species	The BLM must formally consult on the revision of these grazing regulations for all the reasons that motivated consultation in 1995. Further, the sheer number of listed species that will be affected by these regulations - including many such as the Southwestern willow flycatcher, black-footed ferret and Gunnison sage-grouse that are known to be adversely impacted by domestic grazing -- demands consultation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1339		34 Special Status Species	Prairie Falcon. Open habitats with moderate grass cover and low-growing sparse shrubs. Nest-site availability and ground squirrel populations are important factors in habitat selection. Activities affecting ground squirrel abundance, include livestock grazing, frequent fires, ag conversion, poisoning. Disturbance near nest sites (cliffs) can reduce breeding success. The proposal will cause intensified human disturbance and habitat depletion for prey species, with expanded zones of disturbance, and continued very high stocking with meaningless utilization standards will ensure expansion of cheatgrass. Grazing at continued levels and foreseeably even more harmful use, high stocking, placement of habitat destroying and fragmenting livestock facilities/water haul/salt/supplement under TG, OBG, flexibility, minimal review will all harm this species.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	catlin	james	Sierra Club	UT	1085	23	Special Status Species	In Nevada, sage grouse conservation needs are ever increasing. Grazing management that emphasizes meeting the needs of this endangered species has been well documented by leading sage grouse scientists:33 - Calculate stocking rates to ensure that no more than 25-30% utilization of forage. - Grazing should not be allowed until after 20 June. - Remove livestock by 1 August. - Leave at least 70% of the herbaceous production each year to form residual cover to promote sage-grouse nesting the following spring. - Avoid twice-over grazing systems, where livestock pass through an area twice in a grazing season. - Promote larger pastures with fewer fences. Reduce livestock impacts in the centers of pastures or allotments because fences are generally negative for sage-grouse.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Withroder	Amanda	Wyoming Game and Fish Department	WY	1014	3	Special Status Species	Class and type of livestock is important to define, especially if the reason for adjusting timing is to match plant phenology with the grazing animal's preference. Some season of use changes proposed are likely to be on the front end / spring portion of the grazing season, and impacts to wildlife should be considered. As an example, early season grazing may impact nesting habitat for songbirds, sage-grouse, or other wildlife. When the BLM refers to "flexibility" in grazing schedule and stocking rates, it infers a need to make resource decisions and actions quickly. We are concerned that the BLM does not have adequate personnel to monitor resource conditions in a timely manner to be "flexible" for removing livestock when utilization is met or when stocking rates are too high. Permittees may not have the same flexibility at the end of a grazing season and that is when the resource is most vulnerable to damage.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	31	Special Status Species	BLM must re-scope this Grazing Reg change proposa and use it as an opportunity to greatly strengthen grazing protections for GRSG and other sensitive species protections. The GRSG plans (Obama era and Trump era) are greatly inadequate in limiting and controlling grazing damage and disturbance to sage-grouse habitats. Mandatory protective measures sharply limiting or removing grazing impacts and. Disturbance (timing of use, amounts of use) must be required

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nagel	Clinton	Gallatin Wildlife Association	MT	949	13	Special Status Species	FLPMA mandates to "balance wild horse and burro use with other resources" equates at minimum a 50-50 allocation of available forage between wild horses and livestock on all wild horse and burro Herd Areas, including Herd Management Areas. The Proposed Grazing Regulation Revision must take this into consideration. Sec. 302 of FLPMA states: "(a) The Secretary shall manage the public lands under principles of multiple use and sustained yield, in accordance with the land use plans developed by him under section 202 of this Act when they are available, except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law," [43 U.S.C. 1732] and Sec. 102 "(b) The policies of this Act shall become effective only as specific statutory authority for their implementation is enacted by this Act or by subsequent legislation and shall then be construed as supplemental to and not in derogation of the purposes for which public lands are administered under other provisions of law" [43 U.S.C. 1701] In addition, FLPMA requires the public lands to be administered for "multiple-use," which Congress defined as: "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people . . . with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." [43 U.S.C. § 1702(c)]. Because wild horses and livestock compete for limited forage resources - and this limited resource is a primary reason for the zeroing out, or elimination of, wild horses and/or burros from 37% of the original Congressionally-designated wild horse/burro habitat - allowing livestock grazing to continue in zeroed-out Herd Areas violates the multiple-use mandate as required by FLPMA. While commercial livestock grazing is permitted on public lands it is not a requirement under the agency's multiple use mandate as outlined in the Federal Land Policy and Management Act of 1976 (FLPMA). Indeed, public land grazing is a privilege and not a right, and the BLM is mandated by law to protect wild horses and burros. Therefore, the agency's management and PRMP should reflect these priorities and legal requirements.
Wild Horse and Burros								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Bert	Paris Ranch	NV	1247	1	Wild Horse and Burros	We need gathers. Our allotment AML is 20-33 head. As of January 1, 2020 we have approximately 250 wild horses now! -We have been ignored and our business is in jeopardy. Please help us, so we can continue to play a part in feed our nation with beef.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	4	Wild Horse and Burros	An EIS must include the research and monitoring data and the scientific methods used to differentiate between (1) wild horses versus (2) all other wildlife versus (3) livestock. This monitoring research and its subsequent report data and summary must include all information on all methods used by BLM to determine and differentiate between wild horse usage and wildlife usage and livestock usage of forage and water usage for at least the past ten years. Details required (including but not limited to): 1) Water usage designation a) Foraging wildlife b) Wild horses c) Domestic livestock 2) Forage usage designation (AUMs) a) Wildlife b) Wild horses c) Domestic livestock 3) Water and land usage designation for other current or likely "multiple uses" including but not limited to: a) Mining b) Geothermal c) Solar d) Wind turbine e) Oil and Gas f) Sold/leased to outside communities or individuals or companies

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Zarrello	Dana	The Cloud Foundation		1337	11	Wild Horse and Burros	Grazing on public lands is a privilege, and not a right See 43 U.S.C. § 315b & 16 (1943 Taylor Grazing Act, stating that grazing preferences "shall not create any right, title, interest, or estate in or to the lands" belonging to the U.S. Government); 43 U.S.C. § 580l (FLPMA similar provision); Omaechevarria v. Idaho, 246 U.S. 343, 352 (1918) ("Congress has not conferred upon citizens the right to graze stock upon the public lands. The government has merely suffered the lands to be so used"); U.S. v. Fuller, 409 U.S. 488, 494 (1973) (grazing permittee does not acquire a property interest in grazing permit); Swim v. Bergland, 696 F.2d 712, 719 (9th Cir. 1983) ("license to graze on public lands has always been a revocable privilege"); Osborne v. United States, 145 F.2d 892, 896 (9th Cir. 1944) ("it has always been the intention and policy of the government to regard the use of its public lands for stock grazing. . . as a privilege which is withdrawable at any time for any use by the sovereign without the payment of compensation"); Diamond Bar Cattle Co. v. U.S.A., 168 F.3d 1209, 1217 (10th Cir. 1998) (permittees "do not now hold and have never held a vested private property right to graze cattle on federal public lands"); Alves v. U.S., 133 F.3d 1454 (Fed. Cir. 1998) (holding that neither grazing permit nor preference is a compensable property interest). Elevating private interests of livestock grazing, which is permitted merely as an agency discretion, above the statutorily mandated duty to protect wild horses in these areas must be addressed in the Proposed Grazing Regulation Revision. The Proposed Grazing Regulation Revision must consider the interests of those who cherish the opportunity to observe, photograph, and otherwise enjoy wild horses and/or burros which Congress declared to be "national esthetic treasure[s]" when it enacted the Wild Free-Roaming Horses and Burros Act of 1971. The Proposed Grazing Regulation Revision must include creating a regulation that addresses this FLPMA violation that has eliminated
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	1	Wild Horse and Burros	To date, the BLM has disproportionately allocated the majority of Animal Unit Months (AUMs) to private commercial livestock grazing and permitted only a minuscule number of wild horses and burros to live in these same areas. While commercial livestock grazing is permitted on public lands it is not a requirement under the agency's multiple-use mandate as outlined in the Federal Land Policy and Management Act of 1976 (FLPMA). Indeed, public land grazing is a privilege and not a right and the BLM is mandated by law to protect wild horses and burros. Therefore, any revisions to these regulations should reflect these priorities and legal requirements.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Zarrello	Dana	The Cloud Foundation		1337	10	Wild Horse and Burros	FLPMA mandates to "balance wild horse and burro use with other resources" equates at minimum a 50-50 allocation of available forage between wild horses and livestock on all wild horse and burro Herd Areas, including Herd Management Areas. The Proposed Grazing Regulation Revision must take this into consideration. Sec. 302 of FLPMA states: "(a) The Secretary shall manage the public lands under principles of multiple use and sustained yield, in accordance with the land use plans developed by him under section 202 of this Act when they are available, except that where a tract of such public land has been dedicated to specific uses according to any other provisions of law it shall be managed in accordance with such law," [43 U.S.C. 1732] and Sec. 102 "(b) The policies of this Act shall become effective only as specific statutory authority for their implementation is enacted by this Act or by subsequent legislation and shall then be construed as supplemental to and not in derogation of the purposes for which public lands are administered under other provisions of law" [43 U.S.C. 1701] In addition, FLPMA requires the public lands to be administered for "multiple-use," which Congress defined as: "the management of the public lands and their various resource values so that they are utilized in the combination that will best meet the present and future needs of the American people . . . with consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." [43 U.S.C. § 1702(c)]. Because wild horses and livestock compete for limited forage resources - and this limited resource is a primary reason for the zeroing out, or elimination of, wild horses and/or burros from 37% of the original Congressionally-designated wild horse/burro habitat - allowing livestock grazing to continue in zeroed-out Herd Areas violates the multiple-use mandate as required by FLPMA. While commercial livestock grazing is permitted on public lands it is not a requirement under the agency's multiple use mandate as outlined in the Federal Land Policy and Management Act of 1976 (FLPMA). Indeed, public land grazing is a privilege and not a right, and the BLM is mandated by law to protect wild horses and burros. Therefore, the agency's management and PRMP should reflect these priorities and legal requirements.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frazier	Maggie		NY	464	1	Wild Horse and Burros	Any EIS summary MUST include all information on methods used by the BLM to determine & differentiate between WILD HORSE usage, WILDLIFE usage AND LIVESTOCK usage of forage & water usage for at least the PAST TEN (10) YEARS.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Abraham		UT	1166	1	Wild Horse and Burros	we realize that the mustangs are not going away. But we would like to see them managed in the way that the law was written. Roundup excess horses and euthanize any that cannot be adopted.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon			1227	3	Wild Horse and Burros	Trespassing Horses; West-wide the horses are overcrowded and trespassing on other allotments and/or private lands outside of HMA's or HA's. The regulations should state that BLM must remove horses from permits or private lands within 48 hours of being informed of their existence. If BLM can show good cause why they cannot remove horses that fast from a permit they will be required to work out a timetable with the permittee. If BLM cannot remove horses from private property within 48 hours, they must give the landowner permission to do so, without limitation. If BLM does nothing for 90 days then the permittee or landowner will be able to confiscate said horses on private land and sell them under the Estray Laws of their state, without limitation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mihal	Dianne	Stone Cabin Ranch, LLC	NV	1089	1	Wild Horse and Burros	To facilitate functioning rangeland health and to be able facilitate and maintain rangeland improvements as well as allow for the rangeland to function; it is recommended that the extreme overpopulation and lack of control measures concerning the BLM managed Wild Horses be addressed. Once AML numbers are achieved and can be maintained to their designated stocking numbers, then and only then will all other improvements to the grazing lands be successful. Gathers should be done in conjunction with both BLM and USFS and any other land management agency in order to be effective I and will be less cost to tax payers. A functioning method of where the horses will go needs to be developed to facilitate gathers that are in accordance with population growth. Until this is met, rangeland health in these areas as well as in areas where "Wild Horses" exist outside of Herd areas will continue to be degraded to the points thresholds will be crossed. This will affect Wild Life habitat as well as Cattle and Sheep permittees and they will pay the price so to speak for something that is beyond their control.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paris	Rama			1191	7	Wild Horse and Burros	Reducing AUMs also fails to address the ever-growing population of feral horses that are not removed from allotments and continue to increase the degradation of rangelands across the state.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Dailey	David			1162	1	Wild Horse and Burros	Let's keep these horses as the valuable asset they have proven to be as a draw to view. This ancillary activity helps stimulate economic opportunities in regions that otherwise don't generally enjoy tourist participation .

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	8	Wild Horse and Burros	I require the EIS include substantiated data on any proposed reduction or termination of livestock grazing for the next ten to twenty years. Wild horses and burros are legally DESIGNATED on the Herd Management Areas and Herd Areas (HMA & HA) and livestock are only PERMITTED. Definition of the word "designated" is to "set aside for" or "assign" or "authorize". Definition of "permit" is to "allow" or "let" or "tolerate". The wild horse and wild burro legally designated lands and resources are set aside for, and assigned and authorized for, the use of wild horses and burros whereas the livestock is only allowed and tolerated and let to use the public range resources. While commercial livestock grazing is permitted on public lands, it is not a requirement under the agency's multiple use mandate as outlined in the Federal Land Policy and Management Act of 1976 (FLPMA). Public land grazing clearly is a privilege not a right, while the BLM is mandated by law to protect wild horses and burros. Therefore, I require a complete, valid and scientifically supportable assessment including the explanation of the methods used for the assessment, of the past and current and future planned animal unit months (AUMs) for the lands designated in the EIS including allotments for livestock, wild horses and other wildlife be evaluated and presented to the public for review.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	24	Wild Horse and Burros	Ensure grazing management preserves the habitat value of grazed lands for native plant and wildlife species. * * Ensure grazing management does not impede grazed lands from serving as habitat for native predators including wild horses and burros as per the law: § 4710.5 Closure to livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chew	Scott H.	Chew Livestock, Inc	UT	1491	3	Wild Horse and Burros	BLM not taking care of the land. BLM by not keeping wild horse numbers at AML is failing to prevent range problems. The regulations should require adherence to the Appropriate Management Level for the Federal Government as the owners of said livestock. B. Trespassing Horses; West-wide the horses are overcrowded and trespassing on other allotments and/or private lands outside of HMA's or HA's. The regulations should state that BLM must remove horses from permits or private lands within 48 hours of being informed of their existence. If BLM can show good cause why they cannot remove horses that fast from a permit they will be required to work out a timetable with the permittee. If BLM cannot remove horses from private property within 48 hours, they must give the landowner permission to do so, without limitation. If BLM does nothing for 90 days then the permittee or landowner 'will be able to confiscate said horses on private land and sell them under the Estray Laws of their state, without limitation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Wudtke	Ben	Black Hills Regional Coalition	SD	1258	1	Wild Horse and Burros	Any of the above mentioned grazing reforms and innovative proposals mentioned for category 1 are secondary compared to the necessity of controlling the overpopulation of wild horses and burros, and initiating restoration of health to these devastated ecosystems. BHRMUC recognized the tall task at hand and that success will require a huge investment of capital, manpower, tenacious legal defense and scientific expertise. Any effort short of this condemns these degraded lands to continued ecologic destruction and will constitute a total failure of the mission of the BLM.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gottschalk	Mikie			1378	1	Wild Horse and Burros	. Maintain feral horse and burro numbers at established herd management levels and confine such animals to specified HMA's. Additionally, allow for removed animals that are un-adoptable to be sold for slaughter or euthanized to control the population at sustained levels.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	24	Wild Horse and Burros	(a) If necessary to provide habitat for wild horses or burros, to implement herd management actions, or to protect wild horses or burros, to implement herd management actions, or to protect wild horses or burros from disease, harassment or injury, the authorized officer may close appropriate areas of the public lands to grazing use by all or a particular kind of livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ruch	Jeff	PEER		1131	5	Wild Horse and Burros	The method used by the U.S. Bureau of Land Management to assess range conditions is seriously skewed toward minimizing impacts from domestic livestock and magnifying those from wild horses and burros, according to an appraisal by PEER.13 As a result, the BLM's approach to range management targets scattered wild horses and burros while ignoring far more numerous cattle.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hill	Jon			1227	2	Wild Horse and Burros	A. BLM not taking care of the land. BLM by not keeping wild horse numbers at AML is failing to prevent range problems. The regulations should require adherence to the Appropriate Management Level for the Federal Government as the owners of said livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Depoali	Ed			1420	5	Wild Horse and Burros	3. Reduction of grazing use: This is often done for problems created by factors of other than authorized livestock use. Neither feral horses nor wildlife has a set of regulations controlling their use. The impacts of that use can be significant. Any change in active use should be proceeded by reasons given for the change. Up in the case of fuel management and down in the case of excessive feral horses. Any reduction in active use will move to suspended use until conditions change. Grazing preference will not be reduced.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osterhoudt	Elysia		NV	932	3	Wild Horse and Burros	* The Wild Horses need to be reevaluated and addressed to control the overpopulated herds that are starting to grow in areas that the wild horses are not allotted too.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	22	Wild Horse and Burros	Wild/Feral Horses The UCCA believes it is imperative that the BLM create regulation that allows for management and control of wild and feral horses by other entities aside from the BLM. Wild/feral horses have created ecological devastation through out the west. Many counties, grazing associations, states and other groups could effectively assist the BLM in the management of these animals to timely manage in accordance with range conditions. We believe the original "Wild Horse and Burro Act "allow for the BLM to partner better with other agencies and groups to control horse numbers but current BLM regulations and policies do not.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lally	Meghan	Salisbury Livestock Company		1119	6	Wild Horse and Burros	Wild horses are making a large impact on legal grazing. Currently, permittees are expected to build and maintain water developments that are then being destroyed by the overpopulation of horses. I ask, as someone who cares about the condition of the range, range improvements, and the horses, that there is a requirement that horses be kept within their AML.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bottari	Paul		NV	1205	3	Wild Horse and Burros	Wild Horse management is another major area that needs to be addressed. When one user is not controlled then the land is going to take the hit. The permitted livestock operators are also taking a hit as they have to keep reducing their numbers or are not able to see the range improve because of the excess wild horses. The Wildhorse and Burro act established herd management areas and numbers to manage for and these numbers need to be met. Remember these so-called wild horses are truly Feral Horses that originated for domesticated horses running on public lands or who broke away from private owners and have been running wild on the public lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bradshaw	Charlie		WY	1379	3	Wild Horse and Burros	We request wild horses not be managed as "mustangs" if they are not genetically designated as mustangs. I require they be managed as any other grazer on public land and they must meet carrying capacity as any other livestock on the allotments. They should be considered livestock as they are considered livestock and therefore need to meet the designated carrying capacity. If cattle and sheep are considered non-natives and need to be removed from public land then horses ought to be considered non-natives and removed as well. I am not opposed to domestic livestock of any kind be allowed to graze on public land whether they be cattle, sheep, and horses.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bradshaw	Charlie		WY	1379	5	Wild Horse and Burros	We request that if wild horses and burros' trespass on private land that the private landowner be compensated for said trespass. This could be compensated in the grazing lease by simply allowing cattle grazing to continue.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bradshaw	Charlie		WY	1379	2	Wild Horse and Burros	We request that horses and burro number be managed to meet the Herd Management Objective in the individual BLM areas. There is a claim that domestic livestock grazing is not mentioned in Federal Land Policy and Management Act and therefore livestock grazing is a privilege and not a right like the horses and burros in the Wild Horse Act. Livestock is not mentioned because it was a given that livestock will graze as it was already permitted in a FS permit or a BLM lease. It is implied it will occur. It is considered a privilege in the Forest Service but considered a right in the BLM.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ford	Laurie		NM	1374	8	Wild Horse and Burros	The notice fails to include an impact study on how the proposed livestock grazing regulations revisions will affect wild horses and burros, a protected resource the BLM is required, by law, to be considered comparably with resource values in the formulation, or amendment, of land use plans. The proposed revisions will affect their designated herd areas and existing land use plans; therefore, an environmental assessment (EA) of the proposed changes, or an environmental impact statement, must be included in the revision process.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hennessy	Eileen		ME	1199	1	Wild Horse and Burros	The extreme level of grazing on public lands by invasive, destructive livestock, especially in herd areas where federally protected wild equines are meant to be managed as the PRINCIPAL users of their own legal habitat, has a direct cause-and-effect relationship to the number of wild horses/burros allowed to exist on those public lands. Escalating livestock grazing either seasonally, year-round or for any other purpose, greatly diminishes forage availability for federally protected wild equines. The Wild Free-Roaming Horses and Burros Act pf 1971 clearly states that they must be considered "an integral part of the natural system of the public lands". As wild equines live in Herd Areas (including zeroed-out Herd Areas and Herd Management Areas) on public lands managed by the BLM, they are directly affected by BLM grazing regulations
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Meyer	Cathy	Lower Wind River Conservation District	WY	1384	2	Wild Horse and Burros	Our District supports all uses being responsible for taking care of the land. The biggest threat to rangelands in our area that needs immediate correction is the growing number of feral (wild) horses. Livestock grazers will never have a chance to maintain or improve the health of the land without the removal of excess horses whose numbers are 10-20 times AML in our area and are increasing every year. We propose that every permittee who has horses in their allotment be allowed to have five feral "wild" horses per year to train and use as they see fit. Those horses would be spayed or neutered to prevent any breeding of feral (wild) horses. Over time, this practice would reduce the number and reduce the cost of long-term care in outside holding facilities. Further, we support the spay and neutering of all gathered horses. We do not support the turn back of gathered horses to the rangelands especially when the goal is to provide hybrid vigor and more colorful herds. The BLM should not be competing with local folks who breed and raise horses for their livelihood.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Richard	White Pine County Board of County Commissioners	NV	1488	10	Wild Horse and Burros	Horses and Burros must be managed in accordance to the guidelines set forth In the current Horse and Burro Act to minimize the further decline of the range. As with AUM numbers so should AML numbers be kept in check to allow rangeland conditions to not further decline. Unlike consistent or flexible livestock numbers, managed according to range conditions, horse and burro numbers, if not kept under control, will have devastating and irreversible effects on the land. The management of horses must be kept at the same standards as livestock grazers. This will ensure the longevity of the use of the land for generations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Zarrello	Dana	The Cloud Foundation		1337	13	Wild Horse and Burros	D. Federal Land Policy and Management Act of 1976 The Federal Land Policy and Management Act (FLPMA) of 1976 requires that the agencies balance wild horse and burro use with other resources, such as livestock and wildlife. FLPMA addresses the importance of the non-market value within its definition of the term "multiple-use." FLPMA requires that: "(c) . . . consideration being given to the relative values of the resources and not necessarily to the combination of uses that will give the greatest economic return or the greatest unit output." The intrinsic value of wild horses and burros falls under the non-market definition specified by both laws.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hall	D. Shane	Crawford Cattle LLC	NV	615	3	Wild Horse and Burros	-BLM to Enforce Their Own Horse AML Numbers -Most responsible livestock grazers work hard to keep cattle where they need to be and at the proper number. However, when the horse numbers in an HMA are 5-10 times what the AML is, the rangeland and wildlife suffer tremendously. Riparian areas get beat out and the prehensive nature of horses leads to overgrazing and little plant mass residue. The bureau simply needs to gather the horses appropriately and is stated in their regulations and as per permit FMUDs.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Halstead	Amie	Halstead - Forsgren Ranches, Inc.	NV	1331	1	Wild Horse and Burros	As permittees we have seen the increased wild horse numbers disturbing the ecological balance of the Duckwater and Monte Cristo Allotments. The increased numbers have not only been hard on the ecological health of the range, but we have also in the past taken voluntary non-use of 790 AUMs because of the conditions. Meanwhile the wild horse numbers have continually increased, which does not help with the ecological health of the range. It would be my hope that with the grazing reform we could work at getting the horse numbers back to the baseline numbers as established in Wild & Free Roaming Horses Management Plan.
Social Systems								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	4	Social Systems	Additionally, the proposed analysis must not ignore the social impacts at a time when the vast majority of Americans support protecting wild horses on our public lands, while a small minority want our public lands used for livestock grazing alone.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Uhart	Katlyn	Nevada State Grazing Board N2	NV	1174	11	Social Systems	Unfortunately, the N-2 Board has observed a significant deterioration in the BLM's training of beginning Range Specialists, particularly in both the classroom and mentorship by senior Range Specialists in the field. Additionally, the Board and permittees across the state have recognized the continuous shuffle and movement of these specialists before they can truly become comfortable and fully informed on specific allotment permits and permittees that they are responsible for. This has fed into a constant state of unease and lack of trust from both the BLM and the permittee perspective. The Board strongly suggests the retention of Rangeland Specialists and Conservationists at the location where they are hired until they are comfortable and trained in that specific area. These employees should not have to relocate for a promotion, rather there should be opportunities for them to advance in their current position if they are satisfied with the living situation and are effectively handling their work. This effectiveness should be measured by both the BLM and through communication from affected permittees.
Livestock Grazing Management								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yardley	Merrill		UT	884	2	Livestock Grazing Management	When state wildlife officials propose introducing new species or a reintroduction of species, the use and health of land resources can be affected in numerous ways such as increased foot traffic, additional ATV and other vehicle use, increased utilization of vegetation, and so forth. Each having a potentially negative effect on current and historical uses. Before State agencies are given a nod to proceed by the BLM, these connected and sometimes segregated actions should be considered through some type of a NEPA document to ensure rangeland health is not overlooked. This may be as simple as a state evaluation provided to the BLM that documents all permittees have been included in discussions related to the introduction, with all potential effects to livestock grazing recognized and mitigated prior to BLM giving concurrence to the proposal.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brewer	Clay	Wild Sheep Foundation	MT	825	1	Livestock Grazing Management	We also feel that well-designed Assessments and Monitoring are critical to evaluate effectiveness of BLM grazing management, especially when it comes to restoring wildlife populations like bighorn sheep.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	14	Livestock Grazing Management	The long-term impacts could include the unwillingness to invest in an allotment with constantly changing rules and regulations creating uncertainty in tenure or grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kirk	Stephan		ID	694	2	Livestock Grazing Management	Recognize that using livestock to combat invasives such as cheatgrass only spreads the weeds further.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nelson	Ade	Kane County Commissioners	UT	1141	11	Livestock Grazing Management	Livestock producers also benefit from the use of additional feed provided by the invasive species
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Van Dyke	Peter		CA	42	1	Livestock Grazing Management	I'd like to see all livestock off BLM easements two weeks before a hunting season opens.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Mobley	Tom	Sierra Alta Ranch	NM	1385	2	Livestock Grazing Management	federal lands near high density urban areas are experiencing unregulated vehicular and pedestrian traffic that interferes with the ability to graze livestock.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Paul	Pace		UT	997	1	Livestock Grazing Management	Please document the negative impact that non-grazing has on the range by recording the observations created by the study plot on Half-Way Bench,(Lat: 38°17'38.56"N, Long: 110°39'25.40"W,) This plot was established in 1954. The study plot demonstrates the positive impact of grazing. Woody brush and open barren ground is the condition found inside the study plot. Outside the plot (the grazed condition) shows an increase in grass species and an increase in ground cover.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Busselman	Doug	Nevada Farm Bureau Federation	NV	984	22	Livestock Grazing Management	We would encourage the total deletion of regulations linked to the Rangeland Health infrastructure that was created in the 1995 era. As part of the analysis to be carried out through the EIS we request a state by state table, showing the livestock grazing AUMs for each year going forward from 1994. Along with this table, a column should be presented to show the number of acres burned in each state on this annual basis. Through this demonstrated evidences we believe that a very clear story will be presented to highlight the condition declines in land health fundamentals.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	35	Livestock Grazing Management	The BLM in the EIS must analyze the impacts related lethal predator control and carnivore/livestock co-existence mechanisms as discussed in Stone (2016) and elsewhere.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smith	Vera	Defenders Of Wildlife	CO	1204	31	Livestock Grazing Management	Resolving conflicts with predators. Both lethal and non-lethal methods of predator control are used to reduce predation on domestic livestock. Scientific evidence shows that non-lethal methods are often more effective than lethal ones (Moreira-Arce et al. 2018; van Eeden et al. 2018b; Eklund et al. 2017; Treves et al. 2016; Miller et al. 2016) and are more rigorously tested for their effectiveness than lethal methods (van Eeden et al. 2018; Lennox et al. 2018). Lethal predator control does not reduce livestock depredation in the long run and may transfer losses to neighboring sites (Treves et al. 2016; Bergstrom 2017; Santiago-Avila et al. 2018).
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kochan	Phil		OR	1121	1	Livestock Grazing Management	ALL EIS' SHOULD BE IMMEDIATELY AMMENDED TO INCLUDE ALL THE IMPACTS OF NOT GRAZING OUR PUBLIC LANDS. These impacts are not trivial! Some examples include: ... 1) The deforestation and destruction in other countries caused by limiting our grazing. 2) The driving up of meat prices in other countries (and our own) and the effect on the poor (such as driving up meat prices so they can't afford to eat quality protein) due to limiting grazing. 3) Loss of revenue and jobs caused by limiting grazing. 4) Trade imbalances caused by importing meat from other countries. 5) Negative health effects to humans and our herds by importing meat from other countries.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	4	Livestock Grazing Management	3.The EIS should also examine, and discuss for public evaluation, the relationship between grazing and "improvement of rangeland conditions." Here again the information we are aware of suggests that unregulated or badly-managed grazing degrades rangelands. Only in very specific cases can rangeland be "improved" and then only by specific grazing regimes. Unless the BLM can guarantee that such regimes will be used, conditions monitored, and results reported to the public, we see no reason to assume that grazing in fact improves rangelands.
Landownership and Use								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	23	Landownership and Use	12) BLM must fairly and transparently disclose fundamental Indigenous land claims and address environmental justice issues. Cultural sites should be protected from livestock grazing
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cascade	Robyn	Great Old Broads for Wilderness; Northern San Juan chapter	CO	1102	11	Landownership and Use	Disclose underlying Indigenous land claims and address environmental justice issues.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	13	Landownership and Use	Disclose underlying Indigenous land claims and address environmental justice issues.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	23	Landownership and Use	12) BLM must fairly and transparently disclose fundamental Indigenous land claims and address environmental justice issues. Cultural sites should be protected from livestock grazing
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	29	Landownership and Use	Disclose underlying Indigenous land claims and address environmental justice issues.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Heard	Tom		TX	969	8	Landownership and Use	Disclose underlying Indigenous land claims and address environmental justice issues.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	13	Landownership and Use	Disclose underlying Indigenous land claims and address environmental justice issues.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	23	Landownership and Use	12) BLM must fairly and transparently disclose fundamental Indigenous land claims and address environmental justice issues. Cultural sites should be protected from livestock grazing
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lanham	Miteshell	Lander County, NV	NV	1219	3	Landownership and Use	All grazing management actions and strategies should fully consider impact on property rights of in-holders and adjacent private land owners. The potential impacts of such actions on grazing animal health and productivity should also be considered in all actions and strategies.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chapin	Kaley	Nevada Cattlemen's Association	NV	820	17	Landownership and Use	Assure that all grazing management actions and strategies fully consider impact on property rights of in-holders and consider the potential impacts of such actions on grazing animal health and productivity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reed	Ronald		WA	517	13	Landownership and Use	Disclose underlying Indigenous land claims and address environmental justice issues.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	25	Landownership and Use	The regulations should clarify the trailing/crossing permits process. In some circumstances, ranchers have to cross neighbor's allotments on which they do not have a grazing permit. In most of these cases, private-party agreements have been the norm. However, we do understand that in some cases (especially recently), some conflict has cropped up. For only cases in which a conflict between neighbors has come up, a trailing permit outlining the obligations of the trailing rancher is likely warranted. No trailing permit should be required when a rancher is moving livestock on their own allotment. In these circumstances, the alternative is to gather livestock in a concentrated manner to a central location where water often needs to be available, load them onto multiple trucks, haul them to another centralized location, and unload them in a concentrated manner. The localized impacts of this alternative are much higher than dispersed, incidental trailing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Skinner	Robert	Skinner Ranches, Inc	OR	1012	3	Landownership and Use	The Current Grazing Regs allow for the authorized officer to consider whether an applicant for a permit allows "public ingress or egress across privately owned or controlled land to public lands". This is a violation of private property rights and should be totally deleted!
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Shah	Nandita		MD	313	1	Landownership and Use	Public lands should never be given for grazing domestic animals. It should be set aside for wildlife only
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rappaport	Alexandra		NV	269	2	Landownership and Use	Our public lands are owned by the public and they should serve the public's best interest. Increasing grazing is not in the public's best interest. Grazing will only help a few ranchers that are able to profit from this practice while the rest of us and even the ranchers face the environmental consequences.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beningo	Nancy		CA	18	1	Landownership and Use	Livestock grazing is deleterious to prairie ecosystems which are not capagle of supporting the large bovine populations of commercial ranchers. There is no public benefit to removing native species of plants or animals in their favor.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Helmuth	Peter		CO	1050	3	Landownership and Use	I strongly suggest you take the recreating public's views into account instead of a few ranchers who obviously disregard the health of MY LAND for their personal monetary gain.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	masters	kerry	animal advocates of the inland NW	WA	346	1	Landownership and Use	Grazing of livestock should be banned from all public lands. Public lands should be for wild animals.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	cole	mark		MT	742	1	Landownership and Use	BLM island tracts that could be exchanged for landowner tracts or sold to existing leaseholder that would eliminate considerable acccess problems. People could then look at the map or GPS and more easily determine the area they wished to utilize and how the would be able to enter it.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	13	Landownership and Use	Allow for grazing permit retirement and long-term non-use of allotments for conservation purposes.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schultz	John	Montana Public Lands Council	MT	1033	2	Landownership and Use	Returning to pre-1995 and deleting the Babbitt 'Range Reform' will encourage to multiple use concept on our Public Lands. Under the Taylor Grazing Act allotments were allocated to Commensurate Property or Preference Rights---we need to return to these priority positions.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Papscun	Alan		MA	229	1	Landownership and Use	Public lands are exactly that: PUBLIC! Any attempt to change how they are managed, any attempt to slash environmental protections, any attempt to hand over public lands to private landowners and industry is an outright LAND-GRAB for only the benefit of these same private landowners and industry!

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	16	Landownership and Use	In addition to impacts related to weeds and fire, the BLM must consider the full spectrum of likely impacts to Western public lands from domestic livestock. Extensive scientific literature has confirmed that livestock grazing adversely affects many different components of arid Western ecosystems.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baumann	Jim	Nevada State Grazing Board District N-6	NV	986	5	Landownership and Use	Trailing/crossing permits process should be clarified. A trailing permit outlining the obligations of the trailing rancher, would help in the event there is conflict between a rancher crossing a neighbor's allotment, of which he does not have a grazing permit. A solution could be the gathering of livestock in a central location where water is available and trucking them to another location. The impact would be more localized than dispersed, incidental trailing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Baumann	Jim	Nevada State Grazing Board District N-6	NV	986	4	Landownership and Use	Revisions regarding Exchange of Use Agreements provisions should be made to the regulations, clarifying that Exchange of Use will be linked to the state law regarding "fence out" and "open range". The primary focus of this issue is railroad checkerboard parcels that involve many landowners. Nevada law, including case law and Attorney General opinions have consistently held that Nevada is a "fence out" state, which grants permission to grazing "livestock running at large on the ranges or commons"(NRS 568.300) of unfenced private lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	38	Landownership and Use	I require all information and discussion that may create new property rights for ranchers for water rights and range installations be included in the EIS.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bottari	Paul		NV	1205	4	Landownership and Use	Grazing management would be much easier for Public land managers and the private land owner/livestock operators if the checkerboard land pattern found in much of the westerns states could be blocked up more. In Nevada approx.. 62% of the public land in the state is in this checkerboard land pattern. A rancher may own multiple sections but while they are intermingled with the public land sections the BLM still controls the grazing use. If the exchange process could be streamlined to make it easier to block private and public rangeland up the Private livestock operator could be less dependent upon public lands and the Public land managers would have less land to manage.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	7	Landownership and Use	A focus on outcomes and an increase in flexibility would also be highly beneficial to Idaho Department of Land's (IDL) endowment trust land leases. With our scattered and intermingled ownership, many IDL leases are inextricably tied to BLM leases. Though IDL can exhibit high levels of flexibility with the management of our leases, it is often not possible to do so on leases tied to BLM permits. Increased flexibility would allow for more rapid and effective management responses to rangeland issues across land ownership boundaries on a landscape level.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richards	John	State of Idaho	ID	834	6	Landownership and Use	A focus on outcomes and an increase in flexibility would also be highly beneficial to Idaho Department of Land's (IDL) endowment trust land leases. With our scattered and intermingled ownership, many IDL leases are inextricably tied to BLM leases. Though IDL can exhibit high levels of flexibility with the management of our leases, it is often not possible to do so on leases tied to BLM permits. Increased flexibility would allow for more rapid and effective management responses to rangeland issues across land ownership boundaries on a landscape level.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Curtis	Elko County	NV	905	10	Landownership and Use	2.The Agency Should Explore How Grazing Regulation Changes Affect Other Uses As explained above, Elko County's economy is partially reliant on livestock production. Its other main drivers are outdoor recreation and resource extraction. All of these industries require access to public lands. Therefore, Elko County recommends that the agency analyze how proposed grazing regulation changes will affect other public lands users.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Curtis	Elko County	NV	905	9	Landownership and Use	2.The Agency Should Explore How Grazing Regulation Changes Affect Other Uses As explained above, Elko County's economy is partially reliant on livestock production. Its other main drivers are outdoor recreation and resource extraction. All of these industries require access to public lands. Therefore, Elko County recommends that the agency analyze how proposed grazing regulation changes will affect other public lands users.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Curtis	Elko County	NV	905	11	Landownership and Use	2.The Agency Should Explore How Grazing Regulation Changes Affect Other Uses As explained above, Elko County's economy is partially reliant on livestock production. Its other main drivers are outdoor recreation and resource extraction. All of these industries require access to public lands. Therefore, Elko County recommends that the agency analyze how proposed grazing regulation changes will affect other public lands users.
Cultural Resources								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Yardley	Merrill		UT	884	5	Cultural Resources	Under section 106 regulation, historical properties are protected. With the many ranches having use prior to the past 50 years and many more prior to states becoming states, these ranches should be recognized and protected as a cultural-resources accordingly.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hutchinson	Howard	Coalition of Arizona/New Mexico Counties	NM	1109	1	Cultural Resources	Impacts on social, cultural and economics from reductions of livestock numbers;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	14	Cultural Resources	BLM should analyze and adopt a management and administrative approach to livestock grazing that provides the maximum level of protection for known and unknown cultural and historic resources.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1230	5	Cultural Resources	BLM must greatly strengthen and expand its regulatory review and protections for historic properties and cultural sites public lands from ongoing grazing damage and from livestock facilities and facility expansion and other activities that concentrate cows/sheep. Grazing disturbance is highly detrimental to these materials and sites- breaking and displacing artifacts and materials, churning sites so they lose integrity and scientific value, causing erosion that de-stabilizes historical structures and exposes artifacts to surface looting or erosion and damage, and generally desecrating and polluting cultural sites.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Beck	Brent			1245	1	Cultural Resources	(4) Protect archaeological sites and springs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	39	Cultural Resources	The TG, OBG, flexibility, streamlining, etc. increase risks and harms to cultural resources. Intensive grazing-caused erosion will expose cultural materials to the surface, to breakage by 1000 lb. cows and artifact collectors. It will also churn sites, destroying scientific integrity and values. Full intensive cultural surveys must be conducted across lands where TG, OBG and other intensive and/or severe grazing would take place, and the full detrimental impacts must be fully detailed in NEPA documents - not streamlined with CXs.
Tribal Interests								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Naples	Jean		NY	386	6	Tribal Interests	The BLM must consult with local family groups to disclose underlying Indigenous land claims and address environmental justice issues.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jacobson	Susan		CO	631	1	Tribal Interests	Respect and work with indigenous peoples and their traditional homelands when making decisions about grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	DeSoto	Randi	Summit Lake Paiute Tribe	NV	883	6	Tribal Interests	Removing requirements to assess Land Health Standards on each allotment effectively negates the BLM's responsibility to meet its mission as stated above. It is well known that the BLM has failed to meet Land Health Standards on many public land allotments, resulting in the degradation of ecosystem services via mismanagement of grazing regimes. Removing Land Health Standard requirements will only fmther imperil the health of public lands, in turn, threatening the sanctity of our Tribal lands.
Recreation								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cole	Mark			1133	1	Recreation	the strict enforcement and definition of vehicle access by the public. In todays environment every motorcyclist and quad-rider claim that they only ride on existing trails. Many times I have determined that the existing trail is made by either a jack rabbit or field mouse. The environmental sensitivity of these lands do not tolerate the power and suspensions available to these motorized enthusiasts. Hill climbing damage lasts forever.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Brown	Gene		UT	806	4	Recreation	Public Access A. Public access, ATV’s or other motorized vehicle use should be restricted during Spring thaws when the most damage is done to the range. One vehicle driving off road during this time has cause years of damage to the native grasses and loss of foragers our Permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	13	Recreation	I require the EIS include the recreational use impacts including those due to lost opportunities for wildlife viewing, independent research and photography, and human need for solitude and meditation; all of which are popular public activities in these areas, including all details of research studies and methods of research of these studies and names of public agency or private or educational institutions providing the data and results of this research.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Chew	Scott H.	Chew Livestock, Inc	UT	1491	11	Recreation	ATV use has become a pass time for many and severe range degradation is sadly a result, Proper education and better enforcement of violations need to be created
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ritter	Ginger	Arizona Game and Fish Department	AZ	1229	20	Recreation	Section General Topic Include an analysis of wildlife-related recreation in the EIS Comment/Observation The Department and the Theodore Roosevelt Conservation Partnership ave been working together to develop an interactive mapping tool resulting from sportsmen and sportswomen sharing information about their valued areas to hunt and fish in Arizona at https://www.azgfd.com/Recreation/ValueMapping . Action Requested Action: Incorporate these data, or other state data, for Wildlife Related Recreation into the EIS and other NEPA planning documents, along with any additional datasets providing economic information on wildlife related recreation.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	15	Recreation	BLM should analyze and adopt regulations that reduce conflicts between grazing and recreational public land users, including but not limited to opportunities for: primitive recreation, wildlife viewing and photography, connecting with the natural environment, and experiencing solitude and other outstand remarkable values.
Special Designations								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Fite	Katie	WildLands Defense	ID	1157	34	Special Designations	TG, OBG, streamlining of grazing actions, flexibility, etc. should not be allowed in ACECs, Wilderness, in Lands with Wilderness Characteristics and WSAs. Grazing thousand pound exotic cows bred to put on pounds in fragile arid western lands harms natural values, trammels public lands, disrupts and often ruins solitude and primitive recreation opportunities.
Wild and Scenic Rivers								

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	9	Wild and Scenic Rivers	BLM should analyze and adopt regulations that ensure grazing management preserves and improves the ORVs of designated Wild and Scenic Rivers.
Wilderness Areas								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Klingel	Jon		NM	846	7	Wilderness Areas	In many cases, livestock significantly impacts the wilderness character of lands. This problem needs to be assessed in the NEPA documents. In some cases a reduction in livestock numbers or retirement of the allotment needs to be considered.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Ziemann	Lois		CO	644	5	Wilderness Areas	Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Reetz	Pauline	Denver Audubon	CO	779	11	Wilderness Areas	G.Require grazing management to maintain and improve wilderness characteristics and other special values of grazed lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Glasenapp	Logan	New Mexico Wilderness Alliance	NM	1040	3	Wilderness Areas	Grazing not only has long lasting impacts on the landscape through vegetation loss, fugitive dust, and direct physical impacts, but it takes away from the opportunities for solitude offered by wilderness-quality lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Nagel	Clinton	Gallatin Wildlife Association	MT	949	9	Wilderness Areas	9. grazing practices which would lessen wilderness characteristics. Grazing practices in wilderness areas need to preserve those wilderness characteristics, not weaken them.
Wilderness Study Areas								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schultz	John	Montana Public Lands Council	MT	1033	1	Wilderness Study Areas	Wilderness Study Areas needs to be addressed...some of these have been locked up for many years with no management...when fires start in these areas no one can stop them.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Oja	Wes	Hal & Hall Inc.	MT	1123	4	Wilderness Study Areas	The forest on the USFS and BLM lands in the Big Snowies and Twin Coulee WSA's are mature and need to managed or they will end up burning - similar to the fire that originated on the WSA and burned several thousand acres of our deeded land in 2000.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Oja	Wes	Hal & Hall Inc.	MT	1123	3	Wilderness Study Areas	The Big Snowies WSA and the Twin Coulee WSA in central Montana are not worthy of wilderness designation for a multitude of reasons. We have an allotment that is part of both and would like the designation to be rescinded. They are being treated as wilderness, which means "unmanaged" and it should end the same way as the Devil's Backbone WSA ended in SE Montana
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Taylor	James		NM	1466	1	Wilderness Study Areas	Wilderness Study Areas There are too many study areas and a reduction of minor areas should be eliminated. Fl study of proposed wilderness should be reviewed and guide lines be updated.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Keeler	Murray & Judy		NM	1018	10	Wilderness Study Areas	It is our recommendation the WSAs be removed from the BLM's inventory list so they may be actively managed and regenerated.
Transportation								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Devlin	Todd			1120	8	Transportation	Recommendation: Allow mechanical and wheel vehicles into roadless areas to control noxious weeds.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Devlin	Todd			1120	6	Transportation	Recommendation: Actively pursue giving Title V Rights of Way to counties for all county roads; assuring them in writing that they still have right to challenge for RS2477 ROW.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Devlin	Todd			1120	3	Transportation	Current restrictions for using BLM managed gravel for the use of surfacing all weather county roads are too restrictive. (Real life example: Prairie County has been trying to get a gravel permit on LU land since 2013. Currently it is over an 80 mile round trip to haul gravel to this part of the county. Our county road network gives access to over 80% of the federal land within our county to all users of federal land.) Recommendation: All permits to use gravel on LU lands should be approved if it can be shown to benefit existing policies (FLPMA) by providing all weather access via county roads to the public at large. Monetary burdens of distances to haul gravel should be considered and counties should not have excessive hauling costs.
Economy								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bradshaw	Charlie		WY	1379	11	Economy	We request the BLM address the comments that domestic livestock grazing only benefits a small percentage of livestock operators in the nation but the commenters fail to address the fact that more calves are produced on public land that in turn are run on private land as yearlings. Without public land there would be fewer cattle available to the public to consume. Cattle are consumed as more than just beef. We will not address all of the by-products that are produced from cattle but a few uses are hides for leather, insulin for diabetics, and rubber tires.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hutchinson	Howard	Coalition of Arizona/New Mexico Counties	NM	1109	2	Economy	Impacts on tax base of state, Tribal and local governments;

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Knapp	Gregory		CO	1055	1	Economy	Comment 1 - Grazing Regulation Updates should Address the Changing Economic Importance of the Cattle Industry In The West The grazing regulations of the BLM are based on the requirements of the legislation mentioned above. These presume that the grazing regulated is still as appropriate today as it was in 1934 and does not pose any significant issues for the arid American West. The settlement of the American West after the Civil War and through the 20th Century was enabled in rural areas by the establishment of cattle- based, stable agricultural economies, dependent on public land grazing and irrigated hay production. This Water and Cattle system provided the economic base upon which rural communities could be maintained without having to survive the boom and bust cycles of mineral and other resource extraction. The Upper Colorado River Basin provides an excellent example of how this system serves its rural economies. US BLM manages nearly 20 million grazing acres in the Upper Colorado basin. While once highly important to these economies, the cattle industry has faded to a nearly insignificant percentage of economic activity. The following table illustrates this for the Upper Colorado Basin. TABLE: Upper Colorado Basin County Cattle Sales Percentage of Economic Activity 2017 State Summary State: Wyoming Cattle and Calves Sales 1 (\$1000): 95,792 All Upper Basin Counties Total Value of Sales, Receipts, Business Done (\$1000) 2: 4,292,606 All Upper Basin Counties Cattle Sales Percent of Total Value SSRB (inclusive) 3: 2.18% All Upper Basin Countries Cattle Sales Percent of Real GDP 4: 1.26% All Upper Basin Countries Cattle Sales Percent of State Real GDP 4: 0.25% State: Utah Cattle and Calves Sales 1 (\$1000): 152,199 All Upper Basin Counties Total Value of Sales, Receipts, Business Done (\$1000) 2: 5,361,639 All Upper Basin Counties Cattle Sales Percent of Total Value SSRB (inclusive) 3: 2.76% All Upper Basin Countries Cattle Sales Percent of Real GDP 4: 1.76% All Upper Basin Countries Cattle Sales Percent of State Real GDP 4: 0.10% State: New Mexico Cattle and Calves Sales 1 (\$1000): 12,318 All Upper Basin Counties Total Value of Sales, Receipts, Business Done (\$1000) 2: 259,713 All Upper Basin Counties Cattle Sales Percent of Total Value SSRB (inclusive) 3: 4.53% All Upper Basin Countries Cattle Sales Percent of Real GDP 4: 0.162% All Upper Basin Countries Cattle Sales Percent of State Real GDP 4: 0.01% State: Colorado Cattle and Calves Sales 1 (\$1000): 256,175 All Upper Basin Counties Total Value of Sales, Receipts, Business Done (\$1000) 2: 36,790,237 All Upper Basin Counties Cattle Sales Percent of Total Value SSRB (inclusive) 3: 0.69% All Upper Basin Countries Cattle Sales Percent of Real GDP 4: 0.79% All Upper Basin Countries Cattle Sales Percent of State Real GDP 4: 0.08% State: Summary of Upper Basin Counties
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	31	Economy	While evaluating grazing use, consideration should take into account the linkage between private ranch lands and federal land permits. The potential negative consequences for rangelands if livestock grazing on BLM-managed land permit is restrictive or reduced must be stressed. In order to maintain business operations, possible conversion of private land holdings may result from not being able to make economic use of federally-managed lands. In areas where private lands and federally-managed lands are found in alternating sections (i.e., "checkerboard" lands) or where private lands make up a significant portion of large tracts of land, this increase in fragmentation would undoubtedly have a detrimental impact.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	O'Keeffe	John	Oregon Grazing District 1	OR	1011	3	Economy	The regulations' failure to clarify that livestock grazing is a presumptive, primary (though not exclusive) use on Section 3 grazing district lands has resulted in economic instability, economic hardship, and in some cases, complete economic collapse of permittees' ranching operations

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	15	Economy	The proposed regulations will further artificially drive down costs of producing animal food products and increase supply beyond what is appropriate for the marketplace.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	18	Economy	The full cost of the federal grazing program is well overdue for a complete analysis. At the end of the day, the use of federal lands by any interest-rancher, miner, driller, should not come at the expense of federal taxpayers
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Osher	Josh	Western Watersheds Project	MT	1355	26	Economy	The BLM should provide analysis in the EIS about the true costs and consequences ¹³¹ of public lands grazing and provide for direction to include a thorough economic analysis when renewing livestock grazing permits.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	16	Economy	The BLM should increase their grazing fees and AUM rates so that they are at least equivalent to market rates.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Brieanah	American Wild Horse Campaign	VA	966	3	Economy	The BLM must consider the economic and social impacts of the proposed revisions. The BLM's decision must consider the more cost-effective options of reducing livestock grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	carlson	Arvid		ID	880	1	Economy	The ability to graze bLM ground has been a beneficial relationship between rual cumunities and goverment for a very long time. I allows rual communities the ability to raise animals for human consumption, and profit which extends throughout the entire comunity.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Anderson	Ritchie	Uintah County Cattlemen's Association	UT	892	12	Economy	Suspended nonuse AUMs create an economic burden not only for the permittee but the community.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	3	Economy	Since private land makes up only 13% of Eureka County's total land area, dependency on federally administered land limits and is often detrimental to our long-term socioeconomic stability and viability. This threat to our viability is only exacerbated by the layers of regulatory burden that are placed upon multiple uses of these federal lands, including grazing, and a general lack of effort by BLM to coordinate their land management decisions with our local plans and policies. This works to undermine sound land management and creates often adversarial relationships between BLM the County and our ranchers (and other multiple uses). An update to the BLM grazing regulations is needed to overcome these unfortunate circumstances and to build a better model of cooperative and coordinated rangeland use and management.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Schwartz	Frank		ID	1281	6	Economy	Please meaningfully address economics as a component of this NEPA process. As noted in a bullet above, decisions, including the socio-economic impacts, must be specific to each specific landscape area, rather than using generic approaches.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	8	Economy	Please ensure adequate and robust socioeconomic analysis in the EIS and consideration of socioeconomic impacts in the grazing regulations. For instance, of all the agricultural commodity sales in Eureka County, cattle/calves and sheep/lambs historically average 40% of the sales with most of the remainder made up of export hay. According to the 2007 Census of Agriculture, there was a livestock inventory in Eureka County of nearly 25,000 head (both cattle and sheep) and \$25,015,000 worth of agriculture commodity sales (value of livestock sold was not disclosed). The 2012 Census of Agriculture highlighted a cattle inventory of 17,092 (the 2012 Census of Ag did not disclose sheep numbers) with \$36,020,000 worth of agricultural commodity sales (again, the value of livestock sold was not disclosed). The 2017 Census of Agriculture highlighted a cattle inventory of 20,051 (again, the 2012 Census of Ag did not disclose sheep numbers) with \$40,432,000 worth of agricultural commodity sale, \$10,820,000 attributed to livestock sold.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, NV		1332	6	Economy	Please ensure adequate and robust socioeconomic analysis in the EIS and consideration of socioeconomic impacts in the grazing regulations. For instance, of all the agricultural commodity sales in Eureka County, cattle/calves and sheep/lambs historically average 40% of the sales with most of the remainder made up of export hay. According to the 2007 Census of Agriculture, there was a livestock inventory in Eureka County of nearly 25,000 head (both cattle and sheep) and \$25,015,000 worth of agriculture commodity sales (value of livestock sold was not disclosed). The 2012 Census of Agriculture highlighted a cattle inventory of 17,092 (the 2012 Census of Ag did not disclose sheep numbers) with \$36,020,000 worth of agricultural commodity sales (again, the value of livestock sold was not disclosed). The 2017 Census of Agriculture highlighted a cattle inventory of 20,051 (again, the 2012 Census of Ag did not disclose sheep numbers) with \$40,432,000 worth of agricultural commodity sale, \$10,820,000 attributed to livestock sold. Livestock sales, in recent history, accounts for 25 to 40 percent of annual agriculture commodity sales in Eureka County. Therefore, livestock production from 2007 through 2017 was responsible for generating between \$10,000,000 and \$16,000,000 worth of product sales in Eureka County annually.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Visintainer	Gary		CO	904	1	Economy	Permit renewals take years instead of months to accomplish, which places undo hardship on ranches
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Rathbun	Floyd	FIM Corp	NV	1284	2	Economy	livestock production benefits our local and state economies through our retail purchases, labor wages, taxes, and all the other ranch operation expenses, and ranch families like ours are productive and active in our communities.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Frazier	Maggie		NY	464	2	Economy	It would be most enlightening for the public to be informed thru the EIS of the average AUM livestock grazing payment COSTS in the private segment of livestock grazing versus the current public lands payment (\$1.35/animal unit/per month). This would indeed be useful as the grazing fee program costs exceed the money collected, meaning we, the taxpayers, are subsidizing this program by about One Hundred Million (\$100,000,000) each year. Less than 3 percent of the nation's Eight Hundred Thousand (800,000) livestock operators & cattle producers use federal grazing programs. Which would make clear that 97% of livestock producers do not take advantage of this program & somehow manage to conduct a profitable business anyway!
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Cascade	Robyn	Great Old Broads for Wilderness; Northern San Juan chapter	CO	1102	10	Economy	Include an accurate and site-specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Blair	Dan			1190	7	Economy	Include an accurate and site-specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	28	Economy	Include an accurate and site-specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Bocchino	J		NY	444	4	Economy	Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hougham	Tom		IN	434	8	Economy	Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hutchinson	Howard	Coalition of Arizona/New Mexico Counties	NM	1109	2	Economy	Impacts on tax base of state, Tribal and local governments;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hutchinson	Howard	Coalition of Arizona/New Mexico Counties	NM	1109	1	Economy	Impacts on social, cultural and economics from reductions of livestock numbers;
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley			1503	13	Economy	Impacts of BLM decisions include reduced income with reductions in authorized livestock numbers and increased management costs.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Pamela		ID	585	1	Economy	If the cost of administering the leases exceeds the funds generated by the ridiculous low grazing fees, take steps necessary to have Congress raise the fees.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Gregg	Kathy			1411	14	Economy	I require the EIS include the economic impacts of the proposed action, including but not limited to the economic benefits to American taxpayers of reducing or eliminating taxpayer subsidized livestock grazing in this area including all details of research studies and methods of research of these studies and names of public agency or private or educational institutions providing the data and results of this research.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hunner	Bruce		MT	594	1	Economy	Grazing in the western states is to the benefit of only a very small percentage of American families. Particularly in leu of the fact they pay way below market value for their leases (charges should be substantially increased)

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Hutchinson	Howard	Coalition of Arizona/New Mexico Counties	NM	1109	6	Economy	Conservation use impacts on those counties that tax on the basis of livestock numbers on the ranching unit
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kiphart	Donald		NM	513	1	Economy	Collect overdue allotment fees owed by ranchers such as the Bundys of Nevada. If they don't pay take them to court, run their cattle off public lands and rescind their allotment permits! Allotment fees are well below market prices as are mining royalties.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Salvo	Mark	Oregon Natural Desert Association	OR	1321	26	Economy	BLM must consider the broad economic impacts of grazing management on public lands, including economic trade-offs related to the management of other land uses and values including, but not limited to the preservation of native plant species, ecosystem function, recreation, cultural and historic resources, water resources, soils, wilderness values, Wild and Scenic Rivers, and sensitive and imperiled species and other wildlife.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Eaton	Wesley		NM	907	1	Economy	As a public, regulatory agency the BLM should be held to the highest standard regarding data collection and determining impacts of livestock grazing because their decisions have a dramatic influence on my small business, my family, community and culture. o Impacts of BLM decisions include reduced income with reductions in authorized livestock numbers and increased management costs. o The long-term impacts could include the unwillingness to invest in an allotment with constantly changing rules and regulations creating uncertainty in tenure or grazing. o Poorly developed and indefensible data on rangeland conditions (rangeland health) creates a negative perception of livestock use on federal lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howard	Elizabaeth		NM	1080	1	Economy	As a public, regulatory agency the BLM should be held to the highest standard regarding data collection and determining impacts of livestock grazing because their decisions have a dramatic influence on my small business, my family, community and culture. o Impacts of BLM decisions include reduced income with reductions in authorized livestock numbers and increased management costs. o The long-term impacts could include the unwillingness to invest in an allotment with constantly changing rules and regulations creating uncertainty in tenure or grazing. o Poorly developed and indefensible data on rangeland conditions (rangeland health) creates a negative perception of livestock use on federal lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	31	Economy	As a public, regulatory agency the BLM should be held to the highest standard regarding data collection and determining impacts of livestock grazing because their decisions have a dramatic influence on my small business, my family, community and culture. o Impacts of BLM decisions include reduced income with reductions in authorized livestock numbers and increased management costs. o The long-term impacts could include the unwillingness to invest in an allotment with constantly changing rules and regulations creating uncertainty in tenure or grazing. o Poorly developed and indefensible data on rangeland conditions (rangeland health) creates a negative perception of livestock use on federal lands.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	34	Economy	As a public, regulatory agency the BLM should be held to the highest standard regarding data collection and determining impacts of livestock grazing because their decisions have a dramatic influence on my small business, my family, community and culture. o Impacts of BLM decisions include reduced income with reductions in authorized livestock numbers and increased management costs. o The long-term impacts could include the unwillingness to invest in an allotment with constantly changing rules and regulations creating uncertainty in tenure or grazing. o Poorly developed and indefensible data on rangeland conditions (rangeland health) creates a negative perception of livestock use on federal lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	32	Economy	As a public, regulatory agency the BLM should be held to the highest standard regarding data collection and determining impacts of livestock grazing because their decisions have a dramatic influence on my small business, my family, community and culture. o Impacts of BLM decisions include reduced income with reductions in authorized livestock numbers and increased management costs. o The long-term impacts could include the unwillingness to invest in an allotment with constantly changing rules and regulations creating uncertainty in tenure or grazing. o Poorly developed and indefensible data on rangeland conditions (rangeland health) creates a negative perception of livestock use on federal lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lee	Don L. (Bebo)	New Mexico Federal Lands Council	NM	1366	1	Economy	As a public, regulatory agency the BLM should be held to the highest standard regarding data collection and determining impacts of livestock grazing because their decisions have a dramatic influence on my small business, my family, community and culture. o Impacts of BLM decisions include reduced income with reductions in authorized livestock numbers and increased management costs. o The long-term impacts could include the unwillingness to invest in an allotment with constantly changing rules and regulations creating uncertainty in tenure or grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	30	Economy	As a public, regulatory agency the BLM should be held to the highest standard regarding data collection and determining impacts of livestock grazing because their decisions have a dramatic influence on my small business, my family, community and culture. o Impacts of BLM decisions include reduced income with reductions in authorized livestock numbers and increased management costs. o The long-term impacts could include the unwillingness to invest in an allotment with constantly changing rules and regulations creating uncertainty in tenure or grazing. o Poorly developed and indefensible data on rangeland conditions (rangeland health) creates a negative perception of livestock use on federal lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Jones	Bobby			1197	33	Economy	As a public, regulatory agency the BLM should be held to the highest standard regarding data collection and determining impacts of livestock grazing because their decisions have a dramatic influence on my small business, my family, community and culture. o Impacts of BLM decisions include reduced income with reductions in authorized livestock numbers and increased management costs. o The long-term impacts could include the unwillingness to invest in an allotment with constantly changing rules and regulations creating uncertainty in tenure or grazing. o Poorly developed and indefensible data on rangeland conditions (rangeland health) creates a negative perception of livestock use on federal lands.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Kisor	Dave		HI	376	1	Economy	Are they paying to graze on public land? What do we, the tax payingn public gety out of this?

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Burcham	Janet		WA	581	8	Economy	Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Glebs	JOHN		MO	448	7	Economy	Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Logan	donna		PA	221	3	Economy	Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Smetaniuk	Mari		NY	455	6	Economy	Include an accurate and site specific economic analysis of grazing with every permit renewal, revealing the money obtained from grazing fees against the cost of administering the permit.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	2	Economy	In Idaho, where well over half of the land is federally-owned, countless rural communities rely on public lands grazing for their tax base, commerce, and jobs. Few other industries in western rural communities are as stabilizing and longstanding. Ranchers provide seasonal and year-round jobs, bring steady, reliable business to local supply stores and other services, and provide a tax base for rural communities that have little other economic activity. In a study of one western rural community, for example, a 25% reduction in federal grazing led to a 7.3% decrease in sales and a 6.4% loss of jobs (Rimbey et al.. (2001). Ranch-Level Economic Impacts of Grazing Policy Changes: A Case Study from Owyhee County, Idaho)
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Molt	Melodi			1127	3	Economy	Harney County, Oregon is a public land dependent economy with over 75% of its 10,226 square miles controlled by the Federal Government. It is imperative to consider the "effects or impacts "of the federal action on the locally economy.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Terry	Otero County Cattleman's Association		1201	7	Economy	The Interior Board of Land Appeals (IBLA) has ruled that the burden of proof in respect to grazing decisions is on the appellant. Many decisions of authorized officers have a direct economic impact on the permittee/lessee. Grazing allotments are affected by many things and livestock grazing is not the sole influence on rangeland conditions. Often BLM personnel are unfamiliar with the permittees/lessees particular rangeland, ecosystem, and climate. In recent years livestock have been unfairly held responsible for rangeland conditions when conditions do not meet arbitrarily set standards. At times such decisions may be based on personnel's opinion. Personnel may or may not have the appropriate experience to determine rangeland heath. Their 'authorized' decisions could make or break a permittee/lessee. It is nearly impossible to develop a legal challenge to a decision based on "data acceptable to the authorized officer".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Lewis	Pauline	Otero County Cattleman's Association		1201	7	Economy	The Interior Board of Land Appeals (IBLA) has ruled that the burden of proof in respect to grazing decisions is on the appellant. Many decisions of authorized officers have a direct economic impact on the permittee/lessee. Grazing allotments are affected by many things and livestock grazing is not the sole influence on rangeland conditions. Often BLM personnel are unfamiliar with the permittees/lessees particular rangeland, ecosystem, and climate. In recent years livestock have been unfairly held responsible for rangeland conditions when conditions do not meet arbitrarily set standards. At times such decisions may be based on personnel's opinion. Personnel may or may not have the appropriate experience to determine rangeland heath. Their 'authorized' decisions could make or break a permittee/lessee. It is nearly impossible to develop a legal challenge to a decision based on "data acceptable to the authorized officer".
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Stone	Gary	Otero County Cattleman’s Association	NM	1201	7	Economy	The Interior Board of Land Appeals (IBLA) has ruled that the burden of proof in respect to grazing decisions is on the appellant. Many decisions of authorized officers have a direct economic impact on the permittee/lessee. Grazing allotments are affected by many things and livestock grazing is not the sole influence on rangeland conditions. Often BLM personnel are unfamiliar with the permittees/lessees particular rangeland, ecosystem, and climate. In recent years livestock have been unfairly held responsible for rangeland conditions when conditions do not meet arbitrarily set standards. At times such decisions may be based on personnel's opinion. Personnel may or may not have the appropriate experience to determine rangeland heath. Their 'authorized' decisions could make or break a permittee/lessee. It is nearly impossible to develop a legal challenge to a decision based on "data acceptable to the authorized officer".

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	10	Economy	The direct and induced benefits of the livestock industry in Eureka County can be determined based upon information contained in the University of Nevada Report: Reno Technical Report UCED 2005/06-14 Updated Economic Linkages in the Economy of Eureka County. The livestock sector in Eureka County has a final demand multiplier of 2.0283. In short this means that for every \$1 generated by the sector Eureka County's economy will benefit \$2.02 of total revenue. The high final demand multiplier suggests strong economic linkages of the livestock sector to other sectors of the county's economy. Income and employment multipliers are also of importance. The livestock sector has an income multiplier of 1.6812 and an employment multiplier of 1.4439. Thus, for every \$1 generated by livestock production, total county household income increases by \$1.68 and for every job added by the livestock sector, total employment in Eureka County increases by 1.44 employees. In 1999 funds were appropriated through the Nevada Legislature to create a Nevada Public Land Grazing Database and Economic Analysis. In 2000, the Nevada State Department of Agriculture asked the Nevada Association of Counties to assist in fulfilling this mandate. Resource Concepts, Inc. was contracted to help complete the database and analysis. The product of this effort is the report, Nevada Grazing Statistics Report and Economic Analysis for Federal Lands in Nevada (Resource Concepts, Inc. March 26, 2001). Table 3 of the Report (p. 48) summarizes the economic impacts of 1 AUM of grazing in Nevada
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Parkinson	Laurie		CO	991	3	Economy	Public lands grazing is, and has been, fiscally irresponsible, annually costing American taxpayers millions of dollars, both in direct and indirect costs of livestock on lands that belong to all Americans. Local economies do not benefit in any significant way from public lands grazing.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Howe	Jen			1241	3	Economy	More transparency to taxpayers regarding actual cost of grazing program, what they're getting in return for subsidizing grazing fees well below the national average, and the cost of all other programs associated with the grazing program.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Williams	Karen	Idaho Cattle Association		1125	1	Economy	Idaho agriculture makes up 20% of the state's total economic output. A major contributor to that is Idaho's cattle industry which is the second top producing agriculture commodity in the state. According to the Idaho State Department of Agriculture, Idaho ranks 13th in the U.S. for cattle and calves inventory, with more than 2.1 million animals raised by 7,500 beef cattle operations. Of those cattle, it is estimated that approximately 40% spend part of their lives on public land in Idaho. Consequently, it is vital not only to grazing permittees but also to Idaho's economy as a whole that BLM lands continue to be available for livestock grazing in a manner that is economically feasible.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Curtis	Elko County	NV	905	6	Economy	Grazing is not limited by steep or difficult terrain in the same way mechanized removal is, and there are no concerns about harmful residue or herbicide drift as there is with chemical removal. Additionally, the cost of mechanical removal with heavy equipment can be as high as \$65 per acre, while the cost of spraying can reach up to \$250 per acre. Targeted grazing, especially with existing permittees with nearby livestock, can at least be fiscally neutral, and may provide some income depending on the price per AUM offered by the agencies.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Curtis	Elko County	NV	905	7	Economy	Grazing is not limited by steep or difficult terrain in the same way mechanized removal is, and there are no concerns about harmful residue or herbicide drift as there is with chemical removal. Additionally, the cost of mechanical removal with heavy equipment can be as high as \$65 per acre, while the cost of spraying can reach up to \$250 per acre. Targeted grazing, especially with existing permittees with nearby livestock, can at least be fiscally neutral, and may provide some income depending on the price per AUM offered by the agencies.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Tibbitts	Jake	Eureka County, Nevada; Eureka County Board of Commissioners	NV	1044	11	Economy	Basically, for every AUM lost (or gained), the overall impact to the livestock producer himself in one year equaled \$29.40 (in 1999 dollars) in one year. However, to value an AUM in 2020 dollars there must be adjustments based on inflationary changes since 1999. Take the following as an example. The Bureau of Labor Statistics reports an average inflation rate over the past 40+ years (since 1976) to be about 3% per year. Applying a rate of 3% each year since 1999 gives a 2020 value of one AUM to the producer alone at about \$55 per year and \$100 per year to the local economy. What is critical to understand is that AUM loss if typically forever. Forage/AUM loss impacts do not occur to ranchers and local economies as a one-time impact. If AUMs are diminished (or gained), the economic loss (or gain) occurs year-after-year.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Curtis	Elko County	NV	905	8	Economy	Based on this information, Elko County would recommend the agency compare the relative costs of a targeted grazing program to mechanical and chemical removal of invasive grasses.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	11	Economy	Animal food product market prices are below true costs from a broad range of factors. ¹⁵ Receipts from grazing fees were \$125 million less than federal appropriations in 2014. ¹⁶ One study notes, "Appropriations for the BLM and USFS grazing programs have exceeded grazing receipts by at least \$120 million annually since 2002. Had the federal government charged the average private forage market rate for non-irrigated lands in the western states, grazing receipts would have been on average \$261 million, greatly exceeding annual appropriations... Indirect costs for livestock grazing include portions of different federal agencies budgets, such as the USDA Wildlife Services, which expends money to kill thousands of native carnivores each year that may threaten livestock; U.S. Fish and Wildlife Service, which expends part of its budget for listing species as threatened or endangered resulting from harm by livestock grazing; and other federal land management agencies that expend money on wildfire suppression caused by invasive cheatgrass that is facilitated by livestock grazing." ¹⁷ 15 Kenny Torrella, Commentary: Why It's Time for America to Tax Meat, FORTUNE (Feb. 20, 2018), https://fortune.com/2018/02/20/meat-tax-climate-change-health-us/ . 16 Christine Glaser et al., Costs and Consequences: The Real Price of Livestock Grazing on America's Public Lands, THE CTR. FOR BIOLOGICAL DIVERSITY (Jan. 2015), https://www.biologicaldiversity.org/programs/public_lands/grazing/pdfs/CostsAndConsequences_01-2015.pdf . 17 Id

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	12	Economy	Animal food product market prices are below true costs from a broad range of factors.15 Receipts from grazing fees were \$125 million less than federal appropriations in 2014.16 One study notes, "Appropriations for the BLM and USFS grazing programs have exceeded grazing receipts by at least \$120 million annually since 2002. Had the federal government charged the average private forage market rate for non-irrigated lands in the western states, grazing receipts would have been on average \$261 million, greatly exceeding annual appropriations... Indirect costs for livestock grazing include portions of different federal agencies budgets, such as the USDA Wildlife Services, which expends money to kill thousands of native carnivores each year that may threaten livestock; U.S. Fish and Wildlife Service, which expends part of its budget for listing species as threatened or endangered resulting from harm by livestock grazing; and other federal land management agencies that expend money on wildfire suppression caused by invasive cheatgrass that is facilitated by livestock grazing."17 15 Kenny Torrella, Commentary: Why It's Time for America to Tax Meat, FORTUNE (Feb. 20, 2018), https://fortune.com/2018/02/20/meat-tax-climate-change-health-us/ . 16 Christine Glaser et al., Costs and Consequences: The Real Price of Livestock Grazing on America's Public Lands, THE CTR. FOR BIOLOGICAL DIVERSITY (Jan. 2015), https://www.biologicaldiversity.org/programs/public_land/grazing/pdfs/CostsAndConsequences_01-2015.pdf . 17 Id
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Moore	Curtis	Elko County	NV	905	12	Economy	40 CFR § 1508.14 requires analysis of the economic and social effects of an action on an area. Elko County relies partly on livestock grazing as an economic driver. Depending on how the agency chooses to proceed, Elko County's economy and culture could be altered. A baseline data report for Elko County has already been compiled by the University of Nevada NEAP project. It can be found at https://extension.unr.edu/elko.aspx . Based on this, Elko County recommends that the agency examines the economic and social effects of any changes to the current grazing regulations.
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Richter	Joanne	Central OR Bitterbrush Broads	OR	1152	21	Economy	10) BLM must disclose accurate and site-specific economic analysis of every livestock grazing permit renewal, and provide to the public and funds obtained from grazing fees against the cost of administering the permit
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	10	Economy	C. The proposed regulation should update AUM rates to reflect both modern market dynamics and cease incentivizing poor dietary choices. The cost of grazing on public lands per AUM has long been far below market rates. Indeed, the highest rate ever charged by the BLM was \$2.31 in 1981 and has declined to the present day rate of \$1.35. 14 To reiterate, these rates have not only failed to maintain pace with inflation but have decreased by over 70% of face value. Further, these rates are far below those charged for grazing on private lands. This de facto subsidization of grazing has had cascading negative economic impacts on both the federal government and the public taxpayers.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	Carlson	James	Montana Natural Resource Coalition		1342	12	Economy	Issue: Administrative requirements for retirement of grazing allotments with district boundary or economic impacts. Explanation: Retirement of grazing allotments or administrative actions that impact Taylor Grazing Act (TGA) district boundaries require chiefly valuable for grazing determinations by the Secretary of the Interior. This analysis must consider the effect on the distribution of grazing revenues to rural economies, economic disruption to the domestic livestock industry, whether rangeland health can be maintained in the absence of physical rangeland improvements, and other factors. The EIS alternatives should evaluate and incorporate standards for this requirement. Criteria: NEPA/CEQ: 40 CFR § 1500.2 Policy - "Federal agencies shall to the fullest extent possible: ... (e) Use the NEPA process to identify and assess the reasonable alternatives to proposed actions that will avoid or minimize adverse effects of these actions upon the quality of the human environment." "(f) Use all practicable means, consistent with the requirements of the Act and other essential considerations of national policy, to restore and enhance the quality of the human environment and avoid or minimize any possible adverse effects of their actions upon the quality of the human environment." 40 CFR § 1502.1 Purpose - "The primary purpose of an environmental impact statement is to serve as an action- forcing device to ensure that the policies and goals defined in the Act are infused into the ongoing programs and actions of the Federal Government. It shall provide full and fair discussion of ... the reasonable alternatives which would avoid or minimize adverse impacts or enhance the quality of the human environment." 43 CFR Part 4100: 43 CFR §4100.0-5 Definitions - Grazing district means the specific area within which the public lands are administered under section 3 of the [Taylor Grazing] Act. Public lands outside grazing district boundaries are administered under section 15 of the Act. TGA: 43 USC § 315i - "Disposition of monies received; availability for improvements - Except as provided in sections 315h and 315j of this title, all moneys received under the authority of this subchapter shall be deposited in the Treasury of the United States as miscellaneous receipts, but the following proportions of the monies so received shall be distributed as follows: (a) 12½ per centum of the moneys collected as grazing fees under section 315b of this title during any fiscal year shall be paid at the end thereof by the Secretary of the Treasury to the State in which the grazing districts producing such moneys are situated ..." PRIA: 43 USC § 1904(c) - "Range improvement funding: After limitations for prescribed uses; distribution, consultation and coordination; public hearings and meetings; interested parties; priority of cooperative agreements with range users - No less than 80 per centum of such funds provided herein shall be used for on-the-ground
Public Health and Safety								
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	14	Public Health and Safety	Excessive meat consumption of the American public is a public health crisis. Like alcohol or tobacco use, animal food products are an unsafe consumer good when not consumed in moderation. Encouraging and enabling further excessive production and overconsumption of meat with publicly owned natural resources is harmful to human health. By not considering all the externalities associated with production, such as the harm to the environment and costs to the public, the free market is over consuming animal food products that are priced below what their actual price should reflect. This leads to increased and economically inefficient national security, public safety, and human health concerns.

Appendix C - Substantive Comments Organized by Process and Resource Categories

Project Name	Last Name	First Name	Organization Name	State	Letter #	Comment Number	Comment Code Name	Comment Text
DOI-BLM-WO-WO2000-2019-0001-EIS (Proposed Grazing Regulation Revision (43 CFR Part 4100, exclus...))	San Emeterio	Juan Pablo	Northwest Environmental Defense Center (NEDC)	OR	1010	21	Public Health and Safety	Conversely, infectious disease is potentially transmitted to livestock from wildlife in wilderness areas which is then, in turn, possibly passed into the human food chain. ²⁴ "The demand [for animal protein] will further increase potentially infectious contacts between livestock and wildlife leading to an increased potential for new zoonotic diseases to emerge." ²⁵ For example, the Nipah virus can be transmitted from wild fruit bats to domestic swine and then infect humans with a 40%-75% fatality rate. ²⁶ Fortunately, to date only a few outbreaks of Nipah virus have been reported and are outside of the USA. ²⁷ However, there is potential for wildlifeto-livestock-to-human pathways for other infectious diseases. Reducing regulation and oversight of grazing on public lands will exacerbate the public health risk of zoonotic disease transmission by reducing reasonable controls and surveillance over wildlife-livestock-human interactions while encouraging more of this potentially risky commercial activity to commence. 24 Ryan S. Miller et al., Disease at the livestock- wildlife interface: Statute, challenges, and opportunities in the United States (Jun. 2013), https://www.sciencedirect.com/science/article/pii/S0167587712003984 . 25 Id. 26 Nipah Virus, WORLD HEALTH ORG. (May 30, 2018), https://www.who.int/news-room/fact-sheets/detail/nipahvirus .