

DRAFT

September 10, 1996

The Honorable Sherwood L. Boehlert
2246 Rayburn House Office Building
Washington, D.C. 20515-3223

384-3067

Dear Congressman Boehlert,

This letter is in regard to proposed public rangeland grazing bill compromise you released on August 2, 1996.

The Idaho Chapter of The Wildlife Society is an association of professional wildlife biologists, researchers, and managers. The Idaho Chapter has ___ members.

The vast rangelands of the West are frequently viewed by the public as a biological desert. There is no question that this land is lower in biological productivity than the forested landscapes of the East or the agricultural land of the Great Plains. However, don't be misled, these lands have great value to a wide variety of common and unique species of wildlife that are adapted to this type environment. In addition, these lands often provide crucial winter habitat for big game animals that spend most of the year in forested habitats. Bottom line - good condition rangeland habitats support very good populations of wildlife.

Unfortunately, much of the western rangelands have been degraded. This situation was primarily brought about by unregulated livestock use historically but continued overuse in occurring today in more situations than managers and livestock interests would like to admit. Even if we accept the argument that the public rangelands are in the best condition they have been in since the turn of the century, existing range survey information demonstrates conclusively that vast portions of western rangeland are in an unsatisfactory condition and are producing far less than their capability. BLM data reflects that at least 52% of the public rangelands are in fair or poor ecological condition (source: 1993 Public Land Statistics).

We have the opportunity and the responsibility to improve the condition of many of these lands for fish and wildlife resources as well as livestock. The tools (The Taylor Grazing Act, Federal Land Policy and Management Act, and the Public Rangeland Improvement Act) are currently in place to enable resource professionals to carry out their legislative mandates and safeguarding livestock interests. Unfortunately, your current compromise legislation, albeit a good and sincere effort on your part to improve very flawed legislation, would still seriously undermine efforts to improve rangeland conditions in the West. Specifically, the following provisions in the legislation would have negative consequences to fish and wildlife management on public lands:

- The additional monitoring requirements imposed by this legislation places an extreme burden on an underfunded and understaffed agency to carry out its resource protection responsibilities. Sufficient "checks and balances" exist under the existing protest and appeal procedures to protect rancher interests.

- Allowing ownership of range improvements on public land will create an administrative and financial nightmare for resource managers. The additional administrative burden created by this provision will further reduce the already meager time that range managers have to work cooperatively with ranchers to develop and implement improved livestock management programs.
- The requirement to establish Grazing Councils will place another unnecessary administrative and financial burden on the agency, further reducing resource protection and management capability.
- Subleasing allotments can have negative consequences to soil, vegetation, and wildlife resources. New subleases involve the placement of new livestock into unfamiliar surroundings. Until the livestock become familiar with the entire allotment and the location of all the water sources, severe overuse in portions of the allotment frequently occurs. Research has documented that recovery from only one severe defoliation of a native bunchgrasses may take between seven and ten years. For large allotments, the usual situation on most BLM land, it may take two or three years before livestock become familiar with their surroundings.
- Excluding non-governmental organizations or land trusts from holding grazing permits or requesting conservation use will prevent a business-like approach to improving the condition of the public land. During the last 15 years, non-governmental organizations have purchased several ranches here in Idaho. These acquisition have been a win-win solution to long standing problems. The willing seller benefited, fish and wildlife benefitted, and, nearly always, grazing use continued. Through financial compensation to the rancher, the grazing use was brought into conformity with the capacity of the land without controversy and a costly and prolonged battle among competing interests. Why would we want to prevent this from occurring in the future?

In summary, we recommend that you withdraw this legislation. It would be very burdensome on the agency, further reducing its capability to improve resource management and it would not accomplish any objectives that would help ranchers. In fact, it will serve to drive a bigger wedge than already exists between conservationists and ranchers. In spite of all the rhetoric that you may be hearing, we have made considerable progress during the last 10 years in bringing ranching and wildlife interests closer together with programs like "Seeking Common Ground". Help us to continue on this more productive path.

Sincerely,

James Unsworth
President, Idaho Chapter