



Coalition for Public Access

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August 19, 2008

BLM - Carson City Field Office
Attn: Katrina Leavitt
5665 Morgan Mill Road
Carson City, NV 89701

In Reference to: Environmental Assessment, Churchill Canyon Grazing Allotment (EA-NV-030-08-24), June 2008

Dear Ms. Leavitt:

The Coalition for Public Access (CPA), a Nevada advocacy organization, is pleased to have the opportunity to comment on the referenced Environment Assessment. CPA was formed in the spring of 2008 and currently has over 1500 members, mostly from Douglas, Lyon, Mineral, Churchill and Esmeralda counties. Our objective is to maintain open access to public lands for all forms of productive and recreational use. CPA believes that sound management practices employed by Federal land managers, such as the BLM, will ensure that our public lands remain available and accessible for multiple uses.

CPA does not support the proposed action – **A. Decreased Grazing (AUMs) & Season of Use** - identified in the Referenced EA. This proposed action is not consistent with the Technical Recommendations identified in the Churchill Canyon Allotment Evaluation (April 2008) and gives too much deference to the concerns of the Western Watersheds Project (WWP). WWP is committed to eliminating grazing on public land and offers no scientific basis for their opposition to the Technical Recommendations.

CPA supports the alternative action – **D. Modified Permit Terms and Conditions & Construction of Range Improvements** - identified in the Referenced EA. This alternative incorporates most of the Technical Recommendations identified in the Churchill Canyon Allotment Evaluation (April 2008). CPA also supports the incorporation of Technical Recommendations not currently expressed in alternative D.

The BLM has endorsed the management practices of the permittee vis-à-vis the issuance of grazing permits since 1993, a Pine Nut Final Multiple Use Decision (FMUD) in 1995, an Environmental Assessment in 2000, a “final decision” implementing the proposed action contained in the EA in 2003, and multiple annual Temporary Non-Renewable Use (TNR) permits. While the results of evaluations conducted through the issuance of TNRs were not generally favorable, it is unclear to CPA why the BLM appears to have moved from a partnership with the permittee to blaming the permittee for the range conditions. Clearly the BLM would not renew the grazing permits or issue multiple TNRs if there were legitimate concerns with respect to the permittee’s management practices. CPA would encourage the BLM to exercise leadership and improve its relationship with the permittee such that the synergy of a partnership can yield desired improvements in range conditions.

Respectfully,

Larry Simmons

Coalition for Public Access

Steering Committee: Wade Harlan, Mike Rosaschi, Sue Silver, Larry Simmons, Donald Smith, Emery Thran and Phil Tucker