Deficiencies of Sierra Club Policy Code 10.5 "Grazing On The Public Lands" (Adopted September 12, 1992) and Arguments for the Adoption of a Provision Opposing the Grazing of Domestic Livestock on Federal Public Lands

by Mike Hudak, author of
Western Turf Wars: The Politics of Public Lands Ranching

Member Susquehanna Group, Atlantic Chapter (NY), Sierra Club
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Executive Summary
The Sierra Club policy "Grazing on the Public Lands" contains language which is outdated and ambiguous. Pro-ranching advocates could even use part of the policy to justify continued livestock grazing as it is essentially a "grazing management" policy, rather than a policy to optimally manage ecosystems. These policy weaknesses may cause confusion among Club members and could prevent the Club a) from supporting legislation to remove livestock from public lands, and b) from supporting litigation involving ecologically beneficial resource management.

Scientific, economic and social research conducted since the adoption of the Sierra Club policy in 1992 render it obsolete: 1) domestic livestock are incompatible with the vast majority of federal public lands ecosystems whose flora and fauna have evolved over millennia without animals anything like domestic livestock, 2) the economic contribution of public lands ranching to the western states is minuscule, and 3) means other than retaining ranching on public lands are available to prevent subdivision of private ranches holding federal grazing permits. Adding insult to injury, taxpayer subsidies underwrite public lands ranching up to $500 million annually. It is time for Sierra Club policy to recognize these facts and to declare that the grazing of domestic livestock is not an appropriate use of federal public lands.

Note that such a declaration is not necessarily a proposal for an entire Sierra Club policy dealing with grazing. A comprehensive policy might include the grazing of domestic livestock on private land, the management of feral animals on public lands, and even the management of native grazing animals. It might also speak to the management of non-federal public lands.

I strongly emphasize that a provision opposing the grazing of domestic livestock on federal public lands is fundamentally a statement of conservation policy rather than a blueprint

for legislation. It is a response to the question: Would the ecosystems encompassed by federal public lands be likely better off with livestock, or without livestock?

The Sierra Club's Policy on Policies states that conservation policy is "often framed in broad terms and embodies ideals to which the Club aspires." A policy opposing the grazing of livestock on federal public lands certainly fulfills that characterization. Although such a policy would allow the Club to explicitly pursue the goal of abolishing the federal grazing program, it would not necessarily prevent Club members from also participating in activities that are lesser in scope, as is further stated by the Policy on Policies: "Entities may … take positions which involve the incremental realization of the Club's long-term policy goals."

Abolishing the federal public lands grazing program through legislation would admittedly be complex, and would likely include differential treatment of the various classes of ranchers (family, hobby, corporate) using federal public lands. Such legislation would probably include an economic assistance program for family ranchers, money to purchase conservation easements on private ranches vulnerable to development, money to purchase base property inholdings within public lands, and land swaps (or buyouts) to eliminate "checkerboarding" of private, state and federal holdings. But these are, for the most part, matters of politics and economics, rather than conservation, and need not be dealt with in the Club's grazing policy.

Overview of Federal Public Lands Grazed by Domestic Livestock

As described by Jacobs (1991):

> … the eleven western states are home to about 98% of all public lands ranching in this country. The remaining 2% is mostly in the Midwest—where about 325,000 BLM [Bureau of Land Management] acres in five states and several million Forest Service [FS] acres (including national grasslands) are grazed—and in the South, where roughly 1.7 million FS acres are open to ranching. An additional 100,000 or so acres of national forest in the east and some other non-western federal … lands are commercially grazed …
>
> Two government agencies administer 85% of western public ranchland—about 260 million acres, or an area the size of the fourteen eastern seaboard states plus Missouri. Of this 85%, the Bureau of Land Management administers 63% (163 million acres) and the Forest Service administers 37% (97 million acres). Roughly 90% of western BLM and 70% of western FS land is managed for ranching [outside of Alaska]. There are 140 BLM resource areas (local divisions) in the West. Each is grazed by privately owned livestock. Likewise, commercial livestock are allowed and encouraged on all of the West's 102 national forests. National forests in twenty-four eastern states also allow ranching. (p. 21)

Wilderness

Wilderness Areas are administered by four parent federal land managing agencies—Forest Service, BLM, National Park Service, and US Fish & Wildlife Service—under authority of the Wilderness Act of 1964 and FLPMA [Federal Land Policy and Management Act] of 1976. …

The National Wilderness Preservation System is this country's remaining wildest country—a last refuge for wildlife and human interaction with Nature … . Yet, essentially it amounts to little more than a collection of the areas least desirable for human occupation and exploitation—inaccessible areas, rocks and ice, steep mountainsides, rugged canyonlands and badlands, barren deserts, and swamps. Conversely, the most productive, level, accessible lands were taken as private property, mostly by ranchers and farmers, and are now the most abused. In short, public lands are the leftovers and Wilderness is the leftovers of the leftovers. …

The Wilderness Act of 1964 was written and legitimized largely under supervision of the ranching industry; opposition from powerful stockmen might otherwise have killed it. To gain the industry's support, wilderness advocates had to settle on the following language in the enabling legislation:

> *Section 4(d)(4)(2) … the grazing of livestock where established prior to the effective date of this Act, shall be permitted to continue subject to such reasonable regulations as are deemed necessary by the Secretary of Agriculture.*

Subsequently, regulations generally have not been considered "reasonable" if they conflict with ranching interests.

In other words, ranching has continued basically unhampered in most areas even after designated Wilderness. In fact, roughly half of western wildernesses are ranched; most of the remainder are essentially unranchable.

The Wilderness Act also contains language allowing predator "control," even from helicopters, and the construction and maintenance of water developments, fencing, and all other range developments deemed necessary for the continuance of ranching at traditional levels. Regulations allow ranchers to maintain and in some cases construct ranching developments with heavy equipment, leaving many roads cherry-stemmed into wildernesses. (pp. 445–46)

National Grasslands

National Grasslands [NGs] are administered by the US Forest Service, and are largely Dust Bowl lands "rescued" by USDA and added to the USFS System in 1954. Nineteen NGs cover 3.8 million acres, mostly on the Great Plains; well over a million acres are in the 11 western states. Most national grasslands are a confused patchwork of federal, private, and state lands, making administration and enforcement of permit conditions and grazing regulations difficult. (p. 469)

National Wildlife Refuges

National Wildlife Refuges (NWRs), administered by the US Fish & Wildlife Service (FWS), are the only federal lands in the US where wildlife has officially been given higher priority than recreational and commercial activities. Federal law states that no recreational or commercial use shall be permitted on these lands unless the Secretary of the Interior determines that these activities are compatible with the primary purposes for which refuges are established. Though most are basically waterfowl refuges (commonly known as "duck factories"), NWRs are nonetheless the most important system of wildlife reserves in the US.

Still, 156 of the 368 NWRs in the seventeen western states and Pacific Islands allow commercial livestock grazing and/or haying. A report from a comprehensive study conducted by Cornell graduate student Beverly I. Strassmann reveals that in 1986 about 1,400 permittees grazed cattle on 2,432,300 acres and harvested hay (sometimes using irrigation) on almost 30,000 acres, mostly in the West (see Strassmann 1983 and 1983a). About 70% of this acreage was in three states—Montana, Nevada, and Oregon.

Though ranched lands represent only a small portion of the 88 million acres in the National Wildlife Refuge System, they comprise 77% of all refuge land that can be used for ranching. The remaining ranchable land is protected by constraints of laws like the Endangered Species Act or by economics. Strassmann reports that total AUMs grazed in 1980 were 374,849, or 41% more than reported by FWS. (Strassmann 1983) (p. 470)

National Park Service

In the eleven western states the National Park Service currently administers twenty-three national parks, forty-seven national monuments, eleven national recreation areas, and seventeen national memorials, historic sites, historic parks, battlefield parks, seashores and such. These ninety-eight NPS units cover about seventeen million acres, or 2.3% of the West. Somewhat less than 3 million acres of this land is open to commercial ranching, including seven national parks, seven national monuments, five national recreation areas, and seven national memorials, etc. Many NPS units outside the West also allow ranching—even Haleakala National Park in Hawaii.

Livestock production on NPS lands, which is by far mostly cattle ranching, is administered by the National Park Service or, in several cases, adjacent federal land management agencies. Ranching impact generally is less severe than for any other public or private ranchland category in the West. However, some NPS units have serious problems and in most units historic ranching damage lingers (Yosemite, Canyonlands, and Petrified Forest, for example). …

Let's examine the ranching situation on [a few] NPS units:

In Wyoming's Grand Teton National Park, 24,000 acres are grazed by 1,600 cattle owned by eight permittees. Most of this is in the beautiful, grassy, and profitable Snake River Valley; political string pulling secured continued ranching here. Park visitors are encouraged to view the overgrazing cattle, fences and other range developments as part of the natural scenery. ...

The recently created, largely overgrazed Great Basin National Park in east-central Nevada would have encompassed hundreds of thousands of acres of basin and range if it were meant to truly represent the basin and range province. Under pressure from stockmen the proposed park's size was reduced until all that remained was 77,100 acres—*all in the steep mountains*, which are of course the least livestock-productive rangeland. Thus, Great Basin National Park contains no basin! Language in the park bill—without which the bill probably would not have been passed—allows grazing to continue at more or less pre-existing levels indefinitely. A park brochure assures tourists that "cattle grazing [is] an integral part of the Great Basin scene." (p. 474) [Note: In December 1999 the ranchers holding cattle grazing permits in the park agreed to relinquish them in return for compensation from a variety of conservation organizations.]

…

Until a few years ago, 1,800 to 2,500 cattle grazed more than 145,000 acres between October and May in southern Utah's fantastic Capitol Reef National Park. A century of grazing had stripped off native vegetation, caused serious soil erosion, dried up springs and creeks, severely harmed the few remaining riparian areas, destroyed most of the cryptogamic layer, and helped extirpate bighorn sheep and other wildlife. Cattle and numerous ranching developments disturbed Park visitors and degraded the fragile desert scenery.

When the Park was created from Capitol Reef National Monument and surrounding public lands in 1971, the 30-some existing permittees agreed to phase out grazing by 1982. However, that year Utah Senator Jake Garn and other ranching-advocate politicians introduced legislation to extend grazing in the park for the lifetimes of the permittees and their heirs. Congress compromised by extending grazing until 1994. The park supervisor recently attempted to buy-out the permits but the politicos pushed though a provision extending grazing for permittees who don't want to sell; it will extend ranching for their lifetimes and even for those of sons and daughters living in 1971. Today, negotiations and generous pay-offs have induced most stockmen to sell "their" permits, but several permittees still ranch the park. (pp. 474–75)

Analysis of the Sierra Club Grazing Policy

I turn now to the Sierra Club's policy "Grazing On The Public Lands." The policy text is shown in italics, and is followed by my comments.

Sierra Club Policy: Paragraph 1

The goal of the management of grazing on the public lands is to restore and maintain fully functioning natural ecosystems, with their full complements of native species.

This statement echoes livestock industry propaganda that livestock are a tool for managing ecosystems. Consider, for example, this industry quote cited in Jacobs (1991: 136):

> "Livestock grazing has been proven to be essential to proper management of wildlife and other natural resources."—From statement adopted by western state Farm Bureaus, Cattlemens Associations, and Wool Growers Associations.

Quoting from Jacobs (1991: 497):

> The theory that livestock can be a "useful tool" for managing public lands was concocted in the 1960s and 1970s in response to mounting environmental concern and subsequent pressure for ranching reform. Industry "scientists" and "range experts" were marched in with bogus studies to publicize the idea that livestock can be used for environmental manipulation. Reality was turned on its head, and suddenly livestock became a potential benefit rather than actual detriment. The campaign has been moderately successful in dissipating anti-ranching energy, and in many cases is even used to justify intensified ranching.
>
> Today, though the useful tool argument is increasingly used, the ranching establishment has yet to demonstrate real success in using livestock to improve environmental quality. Indeed, results have been erratic, accomplished only with the aid of expensive range developments, and beneficial to only a few ecosystem components—at the expense of many more ecosystem components.

Shanks (1984: 183) expresses similar sentiments regarding studies showing livestock can be used as an ecosystem management tool:

> Most studies were superficial and ignored the complex inter-relationships between large herbivores and other plant and animal life. Other studies were plain silly. Out of this phony research the argument emerged that cattle were a wildlife management "tool" that could benefit many wildlife species. Before long, both stock raisers and academicians portrayed the cow as the finest friend of the western rangelands. Such a conclusion was ridiculous, but the ranchers had "scientific" evidence to rationalize their livestock grazing.

In regard to the restoration of riparian areas Kauffman et al. (1997: 20) state:

> While some have suggested that livestock can be used as a "tool" in riparian enhancement, there is no ecological basis to indicate that livestock grazing, under any management strategy, can accelerate riparian recovery more rapidly than total exclusion (Platts 1991; Elmore and Kauffman 1994).

Since the mid 1980s the cattle management scheme known as Holistic Resource Management or "HRM" [Subsequently renamed "Holistic Management"] developed and promoted

by Allan Savory (Savory 1988; Dagget 1994, 1995) has been touted as the way to ranch ecologically in the arid West. Even more recently, ranching advocates have been promoting this method to a naive public under a variety of names, such as "The New Ranch," "Permaculture Ranching," and "Environmentally Sensitive Ranching." Although Savory's ideas enjoy considerable popularity among range managers in government agencies (if for no other reason than that they are labor and resource intensive, and hence provide an excuse for increasing agency budgets), they have little or no basis in science. Consider this passage from Noss and Cooperrider (1994: 235):

> Savory (1988) … claims that animal impact, which he describes as "all things animals do besides eat" is necessary in arid lands ("brittle environments" as he terms them) to advance succession. Little evidence supports this contention. Animal impact, as Savory defines it, is hard to separate from impact of livestock eating. On the Appleton-Whittell Research Ranch Sanctuary (a relatively brittle environment) grazing was eliminated in 1968. Savory's theory predicted an initial improvement (following the elimination of the stress of grazing), followed by deterioration as the residual beneficial effect of animal impact wears off (Savory 1986 [1988]). The deterioration he predicts would eventually lead to a loss of diversity and relative instability of the ecosystem. Sixteen years later, with neither grazing nor animal impact, both plant species diversity and diversity of several groups studied (birds, small mammals, grasshoppers) had all increased (Bock et al. 1984). Brady et al. (1989) concluded that the data on vegetation and wildlife changes after sixteen years did not support the hypothesis that continued animal impact is needed to prevent ecosystem deterioration. Rather, cessation of grazing allowed recovery.

Many researchers who have studied Holistic Resource Management have reached similar conclusions about its value. Consider these few examples.

Bartolome 1989: In a review of Savory's book *Holistic Resource Management* Bartolome concluded:

> As the major evidence supporting his ideas, Savory writes in glowing terms about his successes in Africa. Others, like American range scientist Jon Skovlin, who revisited those lands in the mid-1980s, claim to have found little evidence supporting Savory's claims for beneficial effects and sustainable higher productivity and much evidence to the contrary. So far, Savory's claims have not been supported by independent tests in the southwestern United States.
>
> Those who apply Savory's approach do so at their peril. What is especially disturbing is that these methods, sold to an audience short of scientific knowledge and frustrated by conventional management options, are becoming popular with federal range managers. Modern range science is not perfect, but rangeland deserves better than to be subjected to a management experiment, this one holistic, without better

justification. Although he sincerely intends to help the livestock producer, because so many of his facts are wrong Savory will help the burgeoning antigrazing movement in the long run. (pp. 591–92)

Brown 1994a: After studying the results of applying HRM for the past couple decades on ranches in Africa, Brown concluded:

> … at least some of Savory's range management practices could be made to work—but only where summer rainfall is adequate and the principle goal is to produce grass. It also helps to have a steady supply of cheap labor. Contrary to Savory's contention that what was good for sheep and cows was good for wildlife, none of the farms I visited in Africa was particularly rich in non-domestic animals. A few small antelope such as springbok were present on Hobson's farm and at Hillside; the tracks of rheebok were seen at Compassberg. The big herds, so essential for the "excited hoof action" touted by Savory, were absent, as were the large predators. When South Africans go to game farming, as many do, they take the livestock off. (pp. 31–32)

Brown 1994b: Surveying a highly touted HRM "success story" (the Whitehorse Ranch in Oregon) Brown observed:

> It is obvious that riparian vegetation does not "need to be grazed," as Savory claims. And there is still too much rabbit brush and other indicators of past overgrazing in evidence for my taste. I would also like to have seen a good many more antelope. And while I would have to give the Trout Creek Mountain Working Group high marks, the public costs in additional fencing are high and the sacrifice made by the rancher is obvious. Not many family ranches could afford to remove so many cows and lease other pastures for so long a time as the owners of the Whitehorse (p. 23) [For additional information about the Trout Creek Mountain Working Group see my article "To Graze or Not To Graze" originally published in *Chesapeake* the newsletter of the Maryland Chapter, Sierra Club.]

Bryant et al. 1989: The experiments of these authors refute several claims made for HRM (in the form of short-duration grazing) as compared to continuous grazing management. They refute the claim that HRM allows increased livestock stocking rates. Specifically, they found that short-duration grazing did not improve the diet quality of grazing animals and that it caused a decline in individual animal performance.

They refute the claim that short-duration grazing increases livestock production. Specifically, that "The level of economic input and management intensity required to establish and operate a short-duration grazing system is excessive, except to increase the ease or flexibility of livestock handling. The return did not justify the expense." (p. 296)

They refute the claim that short-duration grazing increases forage production. Specifically, "Short-duration grazing did not improve range condition at the same or higher

stocking rates … " (p. 296) And furthermore, that "Short-duration grazing did not increase grass or forb standing crop." (p. 296)

Lastly, they refute the claim that "herd effect" improves seedling establishment. Specifically, "Short-duration grazing produced no positive influence on germination or establishment of seeded or native plants, but it did result in soil compaction." (p. 296)

Fleischner 1997: In his review of Dan Dagget's book *Beyond the Rangeland Conflict* (1995)—a collection of HRM "success stories," Professor Fleischner laments:

> Although Dagget poses as an impartial party, his bias toward use of land, and in favor of workers who use it, is evident on almost every page. While the ostensible message is that both ranchers and environmentalists must dispense with partisanship to meet in compromise, virtually every example of recalcitrance involves environmentalists. Perhaps this can be explained as the fervor of the recently converted—Dagget was a Sierra Club wilderness activist for many years before "the light went on." He insists early on that he portrays neither villains nor heroes "just people"—then goes on to paint heroic pictures of ranchers for the next ten chapters; the only environmentalists who receive similar treatment are those who agree with his party line. …
>
> There are numerous instances of scientific, management, and even geographic inaccuracy [in Dagget's book]. … In one case, a photo caption touts a saguaro cactus that is "returning" to a Sonoran Desert ranch because of dramatic improvement in management during the past two decades. If true, this would be the fastest growing saguaro on record. Saguaro growth rates would yield an estimate of the age of the featured cactus at roughly three-quarters of a century. In other words, this cactus didn't return due to wise management; it was simply lucky enough to escape the dozer blade in the first place. Such basic natural history errors undermine the reader's confidence. …
>
> A favorite theme in the book is that the profiled ranchers are creatively using cattle to mimic the natural role of bison (or even Pleistocene megafauna) in grassland ecosystems. There are several problems with this proposal. First, bison had a much more limited distribution than cattle currently do (Fleischner 1994; true even if one grants that "the process of redrawing the map of bison distribution across the West" he alludes to turns out to be accurate). Second, all the talk of grazer-grassland coevolution is essentially irrelevant on the vast majority of western lands; most "rangelands" are not grasslands, but forests, deserts, chaparral, and a variety of other ecosystem types. Third, even if we disregard the above two items, comparative behavioral studies show huge differences in habitat selection, feeding behavior, and impact between cattle and bison (Van Vuren 1982). (pp. 582–83)

Hoffman 1989: 173: Hoffman highlights inconsistencies and a lack of rigor in Savory's explication of HRM in his book Holistic Resource Management (1988). For example, "[Savory] cites few references in support of his views and argues that because '… modern science … (is) … reductionist …' (p. 486), it is of '… limited application to the HRM concept

as a whole …' (p. 513). However, he accepts that '… to comprehend and work with the complexity of our ecosystem we do have to break it up to some extent' (p. 61) and that knowledge derived from reductionist studies '… is often of great importance in cases of detailed specific application' (p. 513). This issue lies at the heart of the holistic-reductionist polemic. Savory's inconsistent rejection of reductionism represents, perhaps, the most controversial aspect of this book. Furthermore, his insistence that some aspects of his model (e.g. 'herd effect' (pp. 263–72)) '… cannot be isolated for research … (but) … can easily be observed and monitored in the field' (p. 265) is difficult to accept."

Jacobs 1991: 525–34: Jacobs both analyzes HRM and recounts his experiences as a student in a workshop led by HRM developer Allan Savory. A few choice quotes will convey the sense of Jacob's critique:

> Savory … points at the worst conventional overgrazing to make HRM look better by comparison. This may impress the conservation community, but he often thereby contradicts himself, for conventional and HRM grazing share most of the same detriments. Indeed, numerous scientific studies indicate that generally HRM works best in moist climates, while in dry regions (most of the West) it may on the average be even more destructive than conventional grazing (Holechek 1987 [sic] [publication date was 1989]). (p. 531)
>
> HRM-style ranching has been established longest in Savory's native Zimbabwe. In 1982 the World Bank/International Finance Corporation examined 7 ranches there where it had been practiced for periods ranging from 7 to 14 years. The Corporation found, "virtually no different effects attributable to grazing systems," and stated that most of the small changes that did occur were due to "short-term changes in rainfall pattern." (Johnson 1987). (p. 531)

Pieper and Heitschmidt 1988: These authors confront the fundamental claims made by Allan Savory for short-duration grazing. They being

> … that dramatic improvements in range condition would occur following proper implementation of a short-duration grazing system … and … that both rate of improvement and individual animal performance would be enhanced as stocking rate increased. (p. 134)

Pieper and Heitschmidt note that these claims were based on an untested hypothesis by Savory, namely

> … that physical animal impact is not detrimental to deteriorating arid ranges but is, in fact, desirable to hasten the advance of plant succession. This is achieved largely through hoof action, which improves water penetration by breaking up hard surface

> capping and algae, lichen and moss communities, and allows for greater grass seedling success. (Savory and Parsons 1980) (as quoted in Pieper and Heitschmidt 1988: 134–35)

Pieper and Heitschmidt further note that since the time of Savory's claims and hypothesis

> … a considerable number of scientific studies have been completed that specifically address the effects of short-duration grazing on above-ground forage dynamics, hydrologic integrity, and livestock performance. … In general, these studies do not support the claims that prompted the research. (p. 135)

For example,

> … short-duration grazing, in a cell-fencing design, increases the number and density of cattle trails, which increases the amount of bare ground sacrifice area. In other words, there is little reason to believe that the effects of trampling on short-duration-grazed rangeland are much different than the effects of any other grazing scheme. (p. 135)

Regarding hydrological impacts Pieper and Heitschmidt state:

> The literature is consistent in describing grazing impacts on hydrological behavior of surface soil profiles. Based on this evidence, it is extremely doubtful that any grazing scheme will improve a local hydrologic circumstance over that found under ungrazed conditions. (p. 135)

And as for Savory's claim that the breaking up of algal (a.k.a. biological soil crusts) crusts by hoof action has an overall beneficial effect, Pieper and Heitschmidt cite J. R. Johansen who wrote:

> It is very important in this author's opinion that ranchers and range managers be aware of the benefits of soil cryptogamic crusts and the dangers involved with their destruction. Even if increased vascular plant cover could be achieved through the disruption of these crusts, the potential increase in soil erosion could lead more quickly to range deterioration and desertification than if the crusts were left intact. (Johansen 1986) (as quoted in Pieper and Heitschmidt 1988: 135)

Skovlin 1987: Skovlin, a range consultant, visited ranches in Africa where the Savory Grazing Method (SGM) (the former name of what is now called Holistic Management) had been applied for up to 14 years. Reporting on his findings, Skovlin states:

> Claims for range improvement in southern Africa through Intensive Short Duration Grazing at double conventional stocking rates are not founded in fact. To the contrary,

> evidence in literature from Zimbabwe and elsewhere indicates it is impossible to have both heavy stocking and improvement in range conditions. … In Southern Africa, where SGM had its beginnings, many ranchers are disillusioned and most rangeland specialists contend there are too many shortcomings to recommend it as prescribed. (p. 166)

[Note: For more recent analyses of applying Holistic Management to livestock production in arid environments see George Wuerthner's article "The Donut Diet: The Too-Good-to-Be-True Claims of Holistic Management" (2003) and Holechek et al. 2000.]

In summary, the notion that domestic livestock can be used as a tool to broadly enhance ecosystem health is livestock industry propaganda that lacks a sound scientific basis. A statement supporting the use of livestock for such management purposes has no place in the policy of the Sierra Club, one of whose objectives is promoting native biodiversity.

Sierra Club Policy: Paragraph 3, Sentence 1
To minimize environmental costs, livestock grazing shall be permitted only on public lands in satisfactory condition, except under agency approved rehabilitation plans.

Most damaging about the Sierra Club grazing policy is its condoning (even "inviting") of domestic livestock grazing on land exhibiting the most biodiversity and productivity. It is from such land that will come the seed source for restoring surrounding land that is in less than "satisfactory" condition. "Satisfactory" land should be thought of in the same way as old-growth forests, as places where ecological processes are left to proceed without human intervention.

The experience of the past 130 years has demonstrated that livestock in western ecosystems have led to drastic declines and even extirpations of many native wildlife populations, and native plants. This negative impact should come as no surprise since cattle evolved, and were first domesticated, in moist river valleys of the Near East (Isaac 1962: 196), while most of the American West is relatively arid, receiving 15" (or less) annual precipitation. [Note: modern cattle were domesticated from the now extinct aurochs (*Bos taurus primigenius*) which was native to central Europe, a temperate region receiving considerably more annual precipitation than most of the American West.] Consider also that since the livestock-preferred vegetation (particularly perennial grasses and sedges) of these western ecosystems evolved over the past 10,000 years without intense herbivory it does not possess defenses against this activity.

Domestic sheep also compete with native species (especially pronghorn) for forage (Beuchner 1950, Hoover et al. 1959, Russell 1964, Taylor 1975, Schwartz and Nagy 1976, Hailey 1979, Smith and Beale 1980, Howard et al. 1990), and that as vectors of disease they

are responsible for 30–40% losses of pronghorn fawn crops on heavily grazed rangelands (Bever 1957).

West of the Rocky Mountains domestic livestock are not filling an ecological niche, but are intruders co-opting the habitat of native wildlife.

Furthermore, in trusting government agencies to manage these "satisfactory-condition" lands responsibly, Sierra Club policy ignores the realities of livestock industry influence within the US Congress, the BLM, and the Forest Service. Efforts for environmental protection within these agencies for such tasks as resource monitoring are further hindered by budgetary constraints. US Fish & Wildlife Service, also typically under-funded, is hindered in its ability to list species as threatened or endangered. Just the titles of several GAO (General Accounting Office) reports from the last decade tell much of this sad story:

- Rangeland Management: More Emphasis Needed on Declining and Overstocked Grazing Allotments (RCED-88-80, June 1988)

- Public Rangelands: Some Riparian Areas Restored but Widespread Improvement Will Be Slow (RCED-88-105, June 1988)

- California Desert: Planned Wildlife Protection and Enhancement Objectives Not Achieved (RCED-89-171, June 1989)

- National Wildlife Refuges: Continuing Problems With Incompatible Uses Call for Bold Action (RCED-89-196, September 1989)

- Rangeland Management: BLM Efforts to Prevent Unauthorized Livestock Grazing Need Strengthening (RCED-91-17, December 1990)

- Public Land Management: Attention to Wildlife Is Limited (RCED-91-64, March 1991)

- Rangeland Management: Current Formula Keeps Grazing Fees Low
(RCED-91-185BR, June 1991)

- Wildlife Management: Problems Being Experienced With Current Monitoring Approach (RCED-91-123, July 1991)

- Rangeland Management: BLM's Hot Desert Grazing Program Merits Reconsideration (RCED-92-12, November 1991)

- Rangeland Management: Interior's Monitoring Has Fallen Short of Agency Requirements (RCED-92-51, February 1992)

- Rangeland Management: BLM's Range Improvement Project Data Base is Incomplete and Inaccurate (RCED-93-92, April 1993)

Much-publicized letters (*Albuquerque Tribune* 1998; Davis 1998; Hoffman 1998) by former Forest Service employees suggest that the management problems detailed in these reports have continued, at least in the Southwest. Renee Galeano-Popp, a wildlife biologist on the Lincoln National Forest, left the agency on April 27, 1998, after twenty years of service. Following her resignation she wrote to the newly appointed Regional Forester, Eleanor S. Towns, sharing her concerns about the well-being of the Forest Service in the Southwest. A few excerpts from Renee's letter resonate with the sentiments expressed in the GAO reports of earlier years:

> My resignation from the Forest Service came on the heels of 6 months work to evaluate the effects of on-going livestock authorizations on threatened and endangered species. During this process, it became vividly clear that the FS has trouble doing what it knows is right and best. For example, implementation of allowable use monitoring has been exceedingly slow. Allowable use is a management tool used by range scientists for decades. It is set professionally by range conservationists in virtually every allotment management plan in the region. Despite on-going litigation pressure, not only haven't these been implemented, FS management is still finding ways to avoid and delay doing so. This appears to be partly due to shortfalls in manpower/funding to monitor and partly due to concerns about the actions that will be needed to avoid exceeding the allowable use (e.g. destocking or reduced animal numbers). …
>
> Despite on-going regional litigation, the Forest [Service] seems to maintain a business as usual attitude. For example, allotments which were vacant and without permittees during the last year were stocked by new permittees this year, even though the Forest Service had knowledge that: a) grazing would not be in compliance with the ESA [Endangered Species Act] and b) that the district did not have the resources to implement allowable use monitoring. This is outrageous. In my opinion, allowable use monitoring is the cost of responsible stewardship. It is the cost of authorizing cattle on public land in the first place. I can understand that to begin monitoring and managing on-going livestock grazing may be difficult, but to solicit a new permittee on a vacant allotment knowing that proper management and legal compliance could not be provided is an outright sham! … (Galeano-Popp 1998)

A similarly frank letter was penned by Leon Fager to Mike Dombeck, Chief of the US Forest Service. The letter in part reads:

> In December, 1997, I retired from the US Forest Service, ending a thirty-one year career with an agency I once loved. In my thirty-one years, I served as a wildlife biologist on the Apache-Sitgreaves and Black Hills National Forests and Regional Fisheries Biologist for the Rocky Mountain Region. Before retiring, I served as Program Manager for

the Southwestern Region's Threatened, Endangered and Sensitive Species Program. I chose early retirement last December because of my growing concerns and frustrations with the Southwestern Region. I could no longer stand by to watch inept leadership take its toll on good employees, natural resources, and public confidence. I would like to share some of my experiences, hopefully giving you insight into why the Southwestern Region has spawned an unprecedented amount of environmental litigation, an angry public, and severely degrading natural resources. It is my hope that the Region can yet be turned around. …

The impact, past and present, of livestock grazing on Southwestern National Forests is the major reason that ecosystems are deteriorating, species are near extinction and watersheds have lost much of their ability to yield high quality and quantities of water. The damage done by livestock is especially apparent on the Region's riparian ecosystems. Riparian areas make up less than 1% of the National Forest's vegetation types yet support the majority of the Regions' rare animal, fish and plant species, as well as water and recreation opportunities. Biologists, over the years, have voiced concerns that livestock are unduly impacting riparian systems in the Southwest. Their concerns have been generally ignored by line officers. Witness, for example, Aldo Leopold's warnings from the 1930s, the 1986 Regional Guide, the 1991 Watershed Assessment, and the 1997 briefing by the Regional fish team. Though disappointing, it is no surprise, most of the line officers were trained in a tradition of timber and range emphasis. They maintain the same mentality today.

The Southwestern Region, over the years, has nurtured a strong and politically effective relationship with the timber and livestock industries. Budgets and targets reflect an entrenched Regional belief that timber and range are the primary products and core values. Wildlife, fish, plants, threatened species, water, and recreation have been relegated to secondary considerations. They are viewed as constraints on the timber and range programs rather than values in their own right. The publics that support the wildlife, fish and rare plant programs are expressly called "the enemy" by some in leadership positions—including the current Director of Wildlife, Fish and Rare Plants!

Fundamentally, the role of biologists in this Region is to support the timber and grazing programs. They have little opportunity to design and implement projects to recover listed and sensitive species. The main reason so much energy and money is spent on endangered species now, is that the Region has been sued numerous times, with more litigation on the way, for its failure to follow the law and protect sensitive species and watersheds. Rather than seeing lawsuits as a sign that something is wrong with management, Forest Service leaders tend to view them as attacks on core programs—timber and range. The Region is now "circling the wagons" and spending millions of taxpayer dollars to defend a livestock grazing program that has outlived its value and needs to be phased out as an inappropriate use of National Forests in the 21st century. … (Fager 1998)

In summary, our federal land management agencies have demonstrated over many decades that they cannot be trusted to follow their own regulations nor even federal law. The Sierra Club's trust in these agencies is undeserved, and that trust should not be embodied in the Club's grazing policy as a justification to continue grazing domestic livestock on federal public lands.

Sierra Club Policy: Paragraph 3, Sentence 2
The criteria for satisfactory condition include lands in good and excellent condition with static or upward trends, with healthy riparian areas and wildlife habitat, and with grazing practices in compliance with land-use plan objectives, standards and guidelines, and with permit requirements.

Federal agencies no longer characterize the condition of public lands in terms of "excellent," "good," etc., as was customary in 1992 when the Sierra Club policy was written, but rather in terms of "desired plant communities" (BLM), and "desired future condition" (Forest Service). Actual ecosystem conditions are then characterized as "natural potential," "late seral," etc. Commentary on this new management system is provided by Noss and Cooperrider (1994: 250–51):

> With this approach, the range manager or management agency would decide what plant community is most desirable for the site, and the range would be evaluated in terms of how it approximates this "desired plant community."
>
> This subjective approach has some significant risks. One risk is that the classification system might be used to manipulate data and misrepresent what is happening. This concern is based on a cynical but largely well-observed mistrust of the agencies by many people. As recently as 1990, BLM reported that its ranges were "in better shape today than ever before in this century" (US Department of the Interior, Bureau of Land Management 1990) even though they have virtually no data to back up this assertion (Keystone Center 1991). In fact, BLM's own statistics show that only 3% of its rangelands are in Potential Natural (Excellent) condition.
>
> A legitimate fear is that an agency like BLM may simply modify its goals (desired plant communities) to resemble more closely the successional stages already present. The agency could then blithely report that 99% (or whatever) of rangelands were meeting agency objectives (i.e., they resemble the "desired plant communities").
>
> A second objection relates to the static nature of such a designation. In a natural landscape, disturbances generally maintain a shifting mosaic of seral states. Few areas in a natural landscape remain permanently in lower seral stages; rather each proceeds through succession, though not necessarily to climax. Thus, 90% of a natural landscape might at any time resemble the climax vegetation with the rest consisting of some combination of seral or less stable states recovering from fire or other disturbances. From 50 to 100 years later, the landscape would have similar proportions of seral stages

> but not in the same locations. Late seral stages would have moved toward mature conditions (potential natural), whereas other areas would be in lower seral stages due to more recent disturbances. By designating a lower successional stage as the desired plant community, managers may try to freeze succession or convert a naturally dynamic system into a static one. This problem raises the question of whether early successional stages can be truly sustainable, that is, whether grazing can be used to maintain lower seral conditions without long-term degradation. This question is unanswered for most rangeland types, although the generally poor condition of rangelands in the western United States suggests that rangelands cannot be maintained in early stages without long-term degradation.

Further complicating the difficulty of interpreting the status of ecosystems under government management stems from a 1992 decision by the US Forest Service to adopt an evaluation method that lumps together "meeting of objectives" with "moving toward objectives," making it impossible to determine the amount of land actually "meeting objectives." (Bureau of Land Management and USDA Forest Service 1994)

Furthermore, the US Forest Service appears to have altogether ignored the detrimental impact of livestock grazing on upland forest dynamics (Belsky and Blumenthal 1997; Morgan and Suckling 1995), putting into question the value of their management objectives for these ecosystems even if they were achieved.

Sierra Club Policy: Paragraph 4, Sentence 1
To minimize economic costs as well as environmental costs, livestock grazing must be permitted at no less than fair market value established on a regional basis.

It sounds reasonable that ranchers should pay the true cost for the goods and services they receive in their use of federal lands. In paying only $1.35 per cow per month (i.e. one "AUM") ranchers on BLM lands are receiving an additional $18.65 of government services per AUM in taxpayer subsidy, according to Robert Nelson, Professor of Environmental Policy at the University of Maryland (Nelson 1996). But this part of Club policy overlooks the unfortunate environmental consequences of raising the grazing fee. It ignores consequences of the 1934 Taylor Grazing Act and of the 1938 Memorandum of Understanding between the Department of Agriculture and the Farm Credit Administration which allow federal grazing permits to be used as loan collateral, and it ignores the tradition in ranch appraisal that includes the size (in AUMs) of federal grazing allotments in ranch value. Were grazing fees raised to anywhere near their true costs the economic effects on small ranchers would be devastating. Ranch values would plummet leaving ranchers to pay off mortgages on properties worth much less than what they paid for them. Ranchers would be tempted to either forfeit their ranches or to subdivide them, with a resulting loss of open space. Some ranchers are already doing this, but I don't think we should encourage it.

Conclusion

The undesirable environmental consequences from more than four centuries of grazing by domestic livestock in the American West are now better understood than when the Sierra Club's grazing policy (Policy Code 10.5) was adopted in 1992. This is due, in no small part, to the summary articles by Belsky et al. (1999), Belsky and Blumenthal (1997), Fleischner (1994), Ohmart (1996), Saab et al. (1995) and Wilcove et al. (1998). Consider a few choice remarks about the impacts in question.

Noss and Cooperrider (1994: 258) state:

> In light of the many detrimental effects of livestock and the difficult challenge of grazing an area sustainably, livestock will need to be removed from many areas where they are now grazed, particularly those areas of the West that receive less than, say, ten to fifteen inches of annual precipitation. A policy such as this may require removal of livestock from over 50% of the West.

What are the implications of this proposed policy for federal public lands? Jacobs (1991: 162) reports that "… 95% of BLM land receives less than 15" of precipitation annually." That's approximately the same percentage of BLM land actually grazed by livestock (Fleischner 1994: 630). So under Noss and Cooperrider's proposal livestock would most likely be removed from all but a few percent of BLM lands. For all practical purposes they would be entirely eliminated.

Approximately 100 million acres of western national forests (US Department of Agriculture, Forest Service 1988) and 25 million acres of forested western BLM land (US Department of the Interior, Bureau of Land Management 1987) is grazed by domestic livestock. Given the now understood role of livestock grazing during the past century in the widespread deterioration of "forest health," by which is meant the development of "... dense stands consisting of more fire-sensitive and disease susceptible species" (Belsky and Blumenthal 1997: 315), it is difficult to see how the Sierra Club can continue to condone livestock grazing in forests.

The devastating effects of domestic livestock on riparian areas are also now better known. There are only two realistic choices for healing these areas: fence livestock out, or end livestock grazing in the watershed. Fleischner (1994:638) provides much evidence for the latter solution:

> In numerous studies of riparian grazing impact, investigators concluded that total removal of livestock was necessary to restore ecosystem health. Along Mahogany Creek, Nevada, reduction in grazing had little benefit; only a complete removal brought about habitat improvement (Dahlem 1979; Chaney et al. 1990). Ames (1977) found that even short-term or seasonal use is too much and compared mere reductions in livestock numbers to letting "the milk cow get in the garden for one night." In a recent compar-

> ison of 11 grazing systems, total exclusion of livestock offered the strongest ecosystem protection (Kovalchik and Elmore 1992). As Davis (1982) put it, "If the overgrazing by livestock is one of the main factors contributing to the destruction of the habitat, then the solution would be to '… remove the cause of the problem.'"

In contrast, management agencies are increasingly eager to accept the fencing option (Yozwiak 1998). But there are two basic arguments against this approach. First, fences present barriers to wildlife. Even though species such as mule deer can easily jump fences, juveniles often become tangled in them and die (Noss and Cooperrider 1994: 241; Ohmart 1996: 271). And second, why should taxpayers assume the additional expense of building (and maintaining) the fences? Indeed, why does public lands ranching justify any taxpayer subsidy?

Currently, taxpayers subsidize public lands ranching to the extent of $500 million annually (Hess and Wald 1995). Specifically, consider that annual management costs at the BLM for livestock grazing are estimated at $200 million. Yet, government revenues earned from livestock grazing on these lands in 1993 yielded less than $20 million (Nelson 1996: 4). In other words, taxpayers picked up more than 90% of the cost of grazing livestock on these lands.

Is the taxpayer subsidy of public lands ranching justified by ranching's economic contribution to the regions in which it exists? Certainly it provides income to the ranchers themselves—of which, in the seventeen western states, there are about 26,300 (Rogers and LaFleur 1999). In the eleven western states where 98% of public lands ranching occurs, the industry contributes only 0.04% of total state income (Power 1996: Table 8-2). And the beef produced on federal public lands amounts to approximately only 2% (by weight) of US production (Committee on Government Operations 1986). Even the administrative costs on BLM land far outweigh the economic return. Nelson (1996: 4) reports: "The federal grazing fee may not reflect grazing activity's true market value; however, even using government estimates, the total economic value of livestock grazing on BLM land is below $70 million, about one third of the administrative cost." In reality then, public lands ranching is much more a lifestyle and a corporate subsidy (Carlson and Horning 1992; Holechek and Hess 1994: 63) than it is an industry.

Some have argued that public lands ranching is essential to maintaining open space. Yet only 22% of ranchers in the eleven western states even hold federal grazing permits (US Department of the Interior, Bureau of Land Management and US Department of Agriculture 1994: Table 3-15), and hence would be affected by the elimination of livestock grazing on federal lands. Even among these ranchers dependence is not total. Power (1996: Table 8-1) points out that dependence on feed from federal lands in these states is only 12%. For many public lands ranchers viable alternatives will include scaling back of operations or leasing private lands.

For the remaining ranchers who will find continuation of ranching unprofitable there is the threat that they will subdivide their base properties. There are two points to consider:

first, many properties are so remote that they have little potential for subdivision; second, for those properties with development potential Wuerthner (1994, 1997) argues that keeping public lands ranchers in business through subsidies and the availability of federal lands only postpones, but does not preclude, the day of reckoning. Eventually, population pressure and greed will win out and the development value of many a base property will exceed its value as a ranch. The only sure-fire solutions to preventing this scenario are the purchase of conservation easements, land zoning, or outright purchase of base properties.

Heretofore my environmental arguments against the grazing of livestock on federal public lands have pertained to areas west of the Rocky Mountain front range. Most of the remaining 2% of grazed federal land in the contiguous forty-eight states is located in the Midwest as National Grasslands which are managed within the general framework of multiple use typical of the National Forests. According to Jane and Carl Bock, Professors of Biology at the University of Colorado, Boulder (Bock and Bock 1995: 219):

> The national grasslands include nineteen administrative units, seventeen of which are on the western Great Plains, from Montana to Texas (Peek and Risser 1979; West 1990). Together, they comprise more than 1.5 million hectares (3.8 million acres), and many include grassland types little represented on any other public lands (Lewis 1989). Some individual grassland blocks are large enough to sustain populations of even the most wide-ranging native Plains animals, such as bison and pronghorn, while most are dispersed among private range and croplands as a series of smaller landscape units.
>
> We are naive neither to the difficulties involved in designating Forest Service land as biological preserves nor to the strength of the opposition to such a change. However, we also are aware of the declining agricultural value of these lands, and of their likely increase in value as natural landscape (e.g., Popper and Popper 1991) [For a more recent account on restoring the midwestern prairie see Popper and Popper 1998]. Many ecosystems represented among the national grasslands are comparatively resistant to the impacts of grazing, and probably could be managed successfully for certain components of the native flora and fauna under conditions of moderate livestock use. However, grazed grasslands are anything but scarce across the central United States, ... We therefore call for absolute protection of the national grasslands from livestock, as well as from exotic vegetation, as an essential part of a long-term strategy to re-create the habitat mosaic that once composed the North American Great Plains.

I note that this view is consistent with the Sierra Club Policy: Wildlife and Native Plants (adopted by the Sierra Club Board of Directors, December 10–11, 1994). Recognizing that some wildlife species may require the disturbed habitat that cattle, or bison provide, and further recognizing that National Grasslands and National Wildlife Refuges are too small to function well without management, this Club policy gives clear direction as to whether we should prefer to manage the area with livestock or native wildlife such as bison. Section 8 from the policy's Preamble states:

> The Sierra Club supports the removal or control of non-native species and rehabilitation and restoration of native ecosystems, unless it is no longer feasible to do so or there is not a documented conflict with the native ecosystem. The Sierra Club encourages the use of native species in restoration and rehabilitation programs, landscaping, and other similar activities under artificial conditions. Reintroduction of extirpated wildlife species should be encouraged and conducted within that particular species' historic range.

Seeking the eventual abolition of the federal grazing program is in keeping with the characterization of conservation policy found in the Sierra Club's Policy on Policies (adopted by the Sierra Club Board of Directors February 19, 1995; amended February 21, 1999), which in part states: "Policy consists of statements of Sierra Club conservation objectives, along with appropriate limits outside of which Club entities may not operate. It often is framed in broad terms and it embodies ideals to which the Club aspires." Yet the adoption of an anti-grazing policy would not necessarily preclude Club members from participating in activities that are lesser in scope, as is further indicated by the Policy on Policies: "No Club entity other than the Board may take a position whose enactment would foreclose the ability of the Club to achieve its long-term policy goals. Entities may, however, take positions which involve the incremental realization of the Club's long-term policy goals."

In view of the considerations presented in this section I conclude that if the Sierra Club's objectives are to preserve and restore our natural resources on federal public lands then the Club's grazing policy should recognize the incompatibility of livestock grazing with the meeting of those objective. In short, I urge the Sierra Club to categorically oppose the grazing of domestic livestock on federal public lands.

In further support of my proposal I have attached a few items referenced above [Note: unlike the hardcopy version of this paper I have not attached these documents to this webpage]:

- Thomas Fleischner's 1994 survey paper about the ecological impacts of livestock grazing in the West. If there were only one article a person had the time or inclination to read about livestock grazing this would be my choice. In just ten pages Fleischner summarizes the findings of more than 170 articles, most from peer-reviewed academic journals. You can read it in less than an hour.

- Belsky and Blumenthal (1997): summarizes more than 80 articles showing the damaging effects of livestock grazing on forests.

- One page from Thomas Power's book, Lost Landscapes and Failed Economies, showing in table format the meager contributions of public lands ranching to western economies both in number of jobs and in income. Provides the evidence to challenge anyone who says that ending public lands ranching will cause severe economic hardship in the West.

- George Wuerthner's article "Subdivisions and Extractive Industries," which examines the relative environmental impacts of extractive industries and subdivisions. Wuerthner diffuses arguments that we need to keep public lands ranchers in business to prevent the subdivision of their ranch base properties. Wuerthner is currently a member of the Sierra Club's Grazing Task Force. [Note: the task force was disbanded during the summer of 2000]

Some Thoughts on a Few Interest Groups Within the Sierra Club That Might Oppose (or at least not openly support) a Policy Opposing Public Lands Grazing.

Anti-Sprawl Advocates. These people are concerned with the construction of homes and businesses near metropolitan areas and in sensitive environmental areas. Urban sprawl is a major environmental problem in the West, and some people seeking to contain sprawl are working with public lands ranchers in an attempt to keep them in business and thereby protect these lands from housing development. The article by Wuerthner (1997) that I've attached as a supplement addresses the issue of subdivisions, but his more recent unpublished essay (Wuerthner 1999) contributes additional useful remarks:

> It's a common fallacy among many environmentalists that they think there's a clear choice between "condos or cows" and I would argue there isn't really a choice.
>
> Let me briefly explain. Agriculture is basically an activity that occurs on low value lands. It's what geographers call a "marginal economic activity." They are marginalized to regions where competition with other land uses don't exist. That's why ranching even developed in the West at all. It was thought you couldn't do anything else with the land. California makes a good point. Originally the Spanish grew cows—and they didn't even use the meat. They killed the cattle and stripped the hides. The meat had no value. They couldn't ship it to population centers cheap enough to compete with meat producers closer to the cities. Eventually, after the gold rush, population grew to the point that cattle for beef became profitable. Most of the Central Valley and LA basin were used for growing cows. But then it was discovered that you could grow all kinds of fruits and vegetables on a lot of this land if you could get water. With water, the cattle were marginalized to the rocky foothills and desert areas where you couldn't farm. Now even the farming in places like LA etc. is being replaced by an even more valuable land use—housing tracts and malls.
>
> I'm not saying that this is good, but I'm noting that when land rises above a certain price, one land use is replaced by another that generates more return for investment.

After additional examples of changes in land use through history, Wuerthner presents his suggestions for resolving the perceived dilemma of choosing between livestock and urban sprawl.

What alternative does that leave? Well you could try zoning. In Oregon, the only state with state-wide zoning—you simply can't subdivide outside of urban growth boundaries. Since the law went into effect in 1972 a million people have moved there and the amount of land in agricultural use has actually increased slightly. There's no other state that I'm aware of that you can say that. Zoning in Oregon has worked very well to limit sprawl. Portland has the same number of people as Denver, but the physical imprint of Portland is five times as small. And Portland still has a lot of parks, etc. It's not unlivable.

Zoning isn't bad, but the best solution, I think, is to buy our open space. And that's the problem with the condos vs. cows debate. People think they don't have to ante up the money to buy land because they assume ranching will remain a viable industry—and this myth is fostered by environmentalists as much as anyone. As long as the general public is given that as a viable alternative to hard cash outlay, they will not feel there is a crisis, and without a crisis, they aren't going to vote to spend the kind of money we need to spend if we want to protect open space and critical biological corridors.

Ironically the only places in the US where people seem willing to vote for money to buy land is where there's no question that if you don't buy it will be developed. In these places people realize there's no choice between condos or cows. It's condos or buy it. And surprisingly, they are putting up the money and it's not liberal states that are necessarily doing this. As you probably know Florida—a fairly conservative state—is spending $300 million a year to buy land. They have bought over a million acres already, plus put another five or six million under conservation easement that prohibits development.

New Jersey just passed a similar bond initiative to buy up 1/6 of the land area of the most crowded state in the nation to preserve as open space. New York did the same thing last year. Collectively these states are spending billions to buy open space and biologically important lands. These states know that if they want to have any open space, they have to buy it. They are beyond the condos vs. cows debate because there are so few cows left to give the illusion that it's even an option.

Although I sympathize with the fears of the open space advocates, I agree with Wuerthner that their support of the ranching industry is misplaced. I believe that with a legislated phase-out of public lands ranching, much of the federal ranching subsidies could be transferred to the purchase of inholdings within public lands, and to the purchase of conservation easements on base properties to prevent the sprawl many fear.

Wilderness Proponents. Although the Wilderness Act of 1964 (Public Law 88-577) and its successor legislation provides for setting aside public lands on which a) the cutting of timber is prohibited, b) the filing of mining claims is time-limited, and c) road construction is prohibited, none of these laws provide for eventual elimination or even reduction of livestock grazing. Thus, wilderness proponents might not publicly support a proposal to

end public lands ranching out of fear that doing so would increase the opposition of livestock producers to their wilderness designation legislation.

It is not unusual, though, for the livestock industry to oppose wilderness legislation even lacking a provision for removing livestock as this media announcement illustrates:

> The 2/18 *Salt Lake Tribune* reported US Congresswoman Diana Degette (D-CO) introduced a bill to designate 1.4 million acres of federal land as wilderness along Colorado's Western Slope. Environmentalists and Representative Mark Udall (D-CO) praised the bill, while Colorado's Republican congressional members immediately opposed the wilderness bill. The proposal would "grandfather" in existing mining and grazing on affected lands, but would prohibit new development. Despite this concession, ranching and mining interests are also opposing the bill. (Greenlines 1999)

So what is really gained politically or environmentally by making the concession of continuing livestock grazing in wilderness?

Consider these comments by [former] Sierra Club Director David Brower on some of the political aspects of wilderness legislation:

> The essential element of wilderness politics is to mobilize the electorate, to make it politically possible for elected officials, and the officials they appoint or condone, to care for the Earth adequately. In my view, that requires sparing and celebrating the entire vestige of wilderness that still remains. We can safely assume that it is no longer available to serve humanity's destructive talents, that its biological diversity, which we are slowly learning to comprehend, is essential to a living Earth, that wilderness-destroying jobs are too brief to be important and that jobs and careers in the restoration of natural and human systems will keep people busy for the foreseeable future—which will be more seeable the more intelligently we work at it. (Brower 1993)

I agree and further state that "wilderness" with livestock is no wilderness. The science presented in the attached articles by Fleischner (1994) and Belsky and Blumenthal (1997) make light of environmental damage caused by livestock that was not well understood at the time of the 1964 Wilderness Act. Knowing this, I think it unwise to support any future wilderness designation that does not provide a time-frame for phasing out livestock grazing.

Nevertheless, existing and even future wilderness legislation can be supported by the Sierra Club concurrent with a "no grazing on federal public lands policy"—just the provision that allows the continuation of livestock grazing need be opposed. This follows from Section II.2 of the Sierra Club's Policy on Policies (adopted by the Sierra Club Board of Directors, February 19, 1995; amended February 21, 1999), which states: "The following procedures are established for taking positions on legislation, agency actions and private actions. … (2) Qualified support. The Club will support improvements, but believes that the proposal or action is sufficiently close to our objectives that it should be moved forward."

Members of Resource Advisory Councils (RACs). An activity open to the western grassroots environmental activist is participation in a BLM Resource Advisory Council (RAC). RACs are composed of ranchers and local "affected interests," typically representatives of environmental organizations (e.g. Sierra Club, Nevada Wildlife Federation, Trout Unlimited). The purpose of a RAC is to arrive at consensus decisions regarding the management of a grazing allotment. But right from the start there are severe limitations on the range of discussion. Allowable proposals might include fencing livestock out of riparian areas, or building more upland water developments—projects that would be paid for by taxpayers. Less favorably viewed would be reductions in livestock. And never discussed would be the total removal of livestock.

For an environmentalist to function in a RAC it is essential for him or her to maintain "credibility" with the ranchers and with the BLM. As one such RAC participant said to me, "Between you, me and the wall, I want the cows off the public lands, but I can't say that in public."

Sierra Club members who participate in RACs may be concerned that the Club's opposition to livestock grazing on federal public lands will negatively affect their ability to function within RACs. One cannot say for sure that it won't. But Larry Walker, a Sierra Club member and retired 26-year employee of the BLM in Oregon has in personal communication argued that just the opposite will occur—that with the added threat of legislation to end public lands ranching, ranchers will be more inclined to adopt proposals for environmental improvement so as to dissipate congressional support for the legislation. Larry is the webmaster of RangeBiome, RangeNet and RangeWatch websites.

Beyond the stifling effect on the speech of environmentalists participating in RACs there is the question of whether RACs even serve a significant environmental interest. Dan Heinz, a 25-year veteran of the US Forest Service, and now an environmental consultant wrote of his concerns with the RAC concept in a letter published in High Country News (Heinz 1994):

> When adversaries are forced to sit down together for a long series of meetings, they soon find a lot to like and respect about each other. The environmentalists or other public-interest representatives soon become very reluctant to push decisions such as significant reductions in livestock. Citizen representatives rarely have the training or temperament to face the heat generated when they stick by an unpopular stand which has angered the ranchers and the ranchers' supporters. Range betterment funds for both the Forest Service and Bureau of Land Management have been abundant for the last fifteen years or so. Committees find spending public funds a much more pleasant activity than facing up to livestock reductions. Consensus decision-making often drags on for months or years, and that is hard on unpaid citizen volunteers. The commodity-interest representatives are there as a part of their business and too often simply outlast the citizen. The profit motive tends to be a stronger motivator over the long term than the more idealistic or altruistic motives of a citizen activist. Citizens rarely have the

expertise to deal with grazing issues. Simply put, the public is easily bamboozled on grazing issues.

A cardinal rule of consensus decision-making—Society of Range Management Coordinated Resource Management Program (CRMP) handbook—is that everyone must agree. This in effect gives individuals veto power. Of course, the person with a financial interest in the status quo is the most likely to take advantage of opportunities to stall. For example, two different participating land managers have told me that the ranchers on the Washoe-Modoc Experimental Stewardship Program committee in Nevada have refused to allow consideration of any reduction in grazing season or in grazing numbers.

There is a fundamental ethical flaw in consensus decision-making. The concept that persons with a direct financial interest in a decision must be excluded from the decision process is basic to our system of ethics. This ethic seems to have been forgotten in the formalized consensus decision programs such as CRMP. In effect, the land manager abdicates his/her decision responsibility to the CRMP committee.

An all-too-typical example of consensus committee performance is the Austin Allotment CRMP in Nevada. The BLM, Battle Mountain District, formed a CRMP committee for the 250,000-acre Austin allotment in 1987. The allotment was generally acknowledged to be badly overgrazed. The committee met many times for the next six years and spent in excess of $500,000 on range reseeding and other range improvements. The BLM completed an allotment evaluation this year [1994] and it showed conclusively the allotment was still being severely overgrazed.

I applaud the environmentalist members of RACs and encourage their efforts in the cause of protecting public lands, but the time has come to recognize that consensus groups have not produced significant environmental improvements in western grazing allotments. Additional efforts, including national legislation to eliminate public lands grazing should be more vigorously pursued.

Ranchers. Let us not forget that the only requirement for Sierra Club membership is payment of an annual fee. Membership is open to all, including individuals who have an economic stake in maintaining the status quo regarding public lands ranching.

Jacobs (1991:496) presents this commentary on the matter:

> Some public lands ranchers have joined conservation organizations in recent years, often taking positions of power to which they are accustomed—a main reason most large conservation organizations refuse to challenge the ranching establishment. While some seem truly concerned for environmental welfare, most seem more concerned with other things. That is, they have come to understand that co-opting the very groups that might otherwise oppose their exploitation of public land is good public relations

> and good politics. For example, a contribution from the X-9 Ranch will reasonably assure that the local Sierra Club will not interfere with the X-9's public ranching operation, especially when the X-9's owner is a Sierra Club board member. A few hundred dollars and a membership fee is a small price for a wealthy stockman to pay to protect an operation worth a million. Additionally, the environmental image he gains from his association with the Sierra Club minimizes opposition from other conservation groups, politicians, and the public.

Although Jacobs' scenario of the X-9 Ranch is hypothetical I have personally met one Sierra Club rancher, and during my travels in the West have heard stories of others. The existence of such people is not just a figment of Jacobs' imagination.

Hunters and Anglers. Fear of angering ranchers who allow them access to their private lands, especially private lands through which access to public lands are gained, prevents many hunters from opposing public lands ranching.

The views of some hunters are changing, though, as is exemplified by the recent coalition (Yozwiak 1997) between the Western Gamebird Alliance (WGA), a pro-hunting organization, and Forest Guardians an environmental organization. Together they are challenging the livestock industry's exclusive "right" to lease state trust lands in Arizona.

I believe that many hunters can be convinced that the long-term benefits of ending public lands ranching outweigh the risk of antagonizing ranchers, and that eventually many will demonstrate the courage WGA exemplifies in its promotional brochure:

> We begin with the conviction that a time must come when our public wildlands are no longer devastated by subsidized grazing, a time when the health of wildlife populations takes precedence over the narrow economic interests of a favored few.
>
> To make that time come sooner rather than never, we are working vigorously and urgently as advocates for all western gamebirds and their habitat.

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