



M Watersheds MESSENGER

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Bison Calf in Yellowstone National Park
photo ©www.flickr.com/lamsongf

Montana Ranchers' Worst Nightmare

by Tom Woodbury

Thanks to the legal muscle provided by WWP and the tremendous grass roots organizing and expertise provided by Buffalo Field Campaign, the landscape of Montana is changing quickly and in a way that favors wildlife over cows. This sea change was dramatically illustrated recently at a state court hearing in Park County, and again shortly thereafter by an aggressive relocation of over sixty Yellowstone bison to tribal lands in northern Montana.

All of this was precipitated by our litigation against the Park Service and Forest Service in federal court in the Spring of 2011. While WWP's legal counsel were leading the charge for emergency relief from a hostile Montana judge in order to stop the slaughter of approximately 1000 bison forced out of the Park by a long, harsh winter, BFC was making sure the Governor's office was flooded with similar pleas from thousands of supporters around the world. Because of this effective collaboration, the ink was hardly dry on Judge Lovell's opinion that slaughtering bison was a "time-honored tradition" in Montana before Governor Schweitzer issued his own emergency order prohibiting the transport of bison within the state for slaughter. About 800 bison are roaming free today as a result.

Under Schweitzer's direction, the state then began working on a plan to allow expanded habitat in Montana for bison that wander out of the Park every year in the form of adaptive management adjustments

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Western Watersheds Project: Working to protect and restore western watersheds and wildlife through education, public policy initiatives and litigation.

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to the Interagency Bison Management Plan. This resulted in state-court litigation being brought by Park County Commissioners, Stockgrowers and the Farm Bureau. With bison just starting to wander out of the Park this year, the state issued final approval of these adjustments, allowing bison to roam freely on their native habitat north of the Park and south of Yankee Jim Canyon (Gardiner Basin) until May 1 - an admittedly incremental but nonetheless significant first step. The hearing in Livingston quickly followed, and it was quite refreshing to see the Montana Department of Livestock aligned with Fish, Wildlife & Parks in defending bison as wild, free-roaming animals.

The Stockgrowers lawyer, Alanah Griffith, asserted that as a hunter she had a constitutional right to have all diseased wildlife excluded from Montana! Montana's constitution ensures a "clean and healthful" environment and one can not listen to these arguments without wondering why cows in streams do not violate our constitutional right.

Farm Bureau attorney Hertha Lund was even more rabid: "They see bison as a wild, free-roaming animal," she said while motioning toward the defendants. "We see them as infected with a bio-terrorism agent." She repeatedly referred to bison as "bio-terrorists." She also insisted that what was at stake were children in playgrounds at risk of incurable undulant fever -- which became a non-issue when we started pasteurizing milk in the 1940s. Apparently Lund imagines children ingesting aborted bison fetuses, as that is the only way they would be at risk.

The judge himself saw through this rhetorical ruse noting that "Elk are the Achilles' heel in everything the

plaintiffs are arguing. The brucellosis issue transcends bison." In the end, the rather ridiculous plaintiffs withdrew their motion to enjoin implementation of the increased tolerance and the trial portion of the case was postponed until August.

Then, in a highly controversial move, 64 bison being held at Corwin Springs quarantine facility near Gardiner were loaded under cover of night onto trucks and transported to the Fort Peck Reservation on March 19. Last December the Montana Fish, Wildlife & Parks Commission had voted to approve the relocation of all the bison that remained in quarantine to the Fort Peck and Fort Belknap Indian Reservations in northeast

*"They see bison as a wild, free-roaming animal," she said while motioning toward the defendants.
"We see them as infected with a bio-terrorism agent."*

Montana. According to news reports, "Ranchers worry about bison trampling fence, getting loose and then eating their hay." Naturally, they sued the state on this as well.

According to the agreement between Fort Peck and FWP, the bison

will be placed behind a seven foot fence and if they get out the tribe will be responsible for returning the bison to pasture. And 25% of the offspring will be returned to the State of Montana for conservation management. According to the rancher's attorney this is "just part of the beginning of a full-scale, full-court press to putting a large, wild, free ranging bison herd through a huge part of northeastern Montana."

We couldn't agree more! That is why we are arguing two cases currently in the Court of Appeals - one would force the Gallatin National Forest to treat bison like any other resident wildlife species while simultaneously putting the Park Service out of the bison burger business. The other would force BLM to restore and preserve all the valuable wildlife habitat in the Upper Missouri River Breaks National Monument that is suffering from over a century of intense livestock grazing. We are determined to make the ranchers worse nightmare a reality, and to fulfill the dreams of so many Native Americans, shared by so many non-natives, to return bison to their proper keystone role in Big Sky country.

*Tom Woodbury is WWP's Montana Director.
He lives in Missoula.*

Western Watersheds Project encourages all readers to support the Buffalo Field Campaign, working 365 days a year to save our only remaining herd of wild bison!

Buffalo Field Campaign

PO Box 957 • West Yellowstone, Montana 59758
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Sage Grouse Core and Priority Models: Sacrificing Habitats and Populations

by Katie Fite

As WWP members probably know, the BLM is doing everything it can to keep the sage-grouse off the Endangered Species list. The livestock grazing and energy industries are afraid that if the bird gets listed, it's game-over for their control of western public lands and the BLM is trying hard to get the industries what they want.

One example of the BLM's new planning effort comes from Wyoming where a "Sage-Grouse Core Model" was developed to protect token areas while sacrificing others in large areas of sagebrush wildlands. There is much hype over the model and the BLM's current derivative, a "Priority" habitat scheme, is being touted in the west-wide sage-grouse EIS process now underway. These artificial habitat categories are largely based on numbers of birds counted on accessible leks. (There is no accounting for lek significance in areas the BLM can't easily survey.) Sagebrush habitats with lower densities of birds at leks are not identified as Core Areas and new development is allowed on up to 5% in Wyoming Core habitat and 3% in BLM's current Priority application. Effectively, the BLM is forsaking the majority of prime habitat for a few core or priority areas, and even within those few areas the agency is allowing just a little bit more development. No place is really off-limits.

The BLM's proposed plan "protects" just a fraction of the "Priority Habitat," sacrifices "General Habitat" and entirely neglects habitat not currently suitable for the bird. In many areas the "non-habitat" includes public lands where the BLM has promised the public - and spent millions of dollars on "restoration" actions - that sage-grouse habitat will be restored, including Jarbidge BLM lands. In Idaho even occupied leks in areas of intact sagebrush are considered only to be "general" habitat.

This is grossly insufficient. Sage-grouse are a landscape species. They need vast areas of the sagebrush landscape to fulfill their seasonal needs. Birds may move large distances from the lek site to nest and even further for winter habitat. Imposing a "conservation" model that immediately chops off habitat and occupied lek and use areas is not in the interest of conservation. Nor is imposing a model that allows new development of even the most important areas.

At first glance, one might think 3% new development in BLM's Priority Areas is not very much disturbance within key sage-grouse areas. But the agencies define "development" in ways that substantially underestimate the overall impact of the project. For example, while a transmission line has impacts such as elevated nesting structures for sage-grouse predators, hazardous wires, weed-spreading road network, etc., the typical environmental impact statement for this type of project assures the reader that the effects can be "minimized and mitigated." Unfortunately, minimization and mitigation only occurs in the lands directly affected by transmission line

Male Sage Grouse in Flight
photo ©Tatiana Gettelman



construction and not in the entire project development's footprint, i.e. roads and wide areas of predation created by new structures. Thus, the three percent model sacrifices much more land than the model admits.

Development aside, the current sage-grouse planning effort seriously underestimates the impacts of livestock grazing on the species. It purposefully downplays the tremendous ecological footprint of livestock grazing across the range of sage-grouse and ignores the fact that declines in sage-grouse have long been occurring in areas that are not undergoing large-scale energy development or fire. It fails to admit that areas where livestock grazing has been removed (like Hart Mountain NWR and Sheldon NWR) have seen improvements in sage-grouse populations, or that sage-grouse are doing well in areas with vacant allotments.

Ultimately, the Core and Priority habitat schemes with their habitat sacrifice categories are allowing more habitat to be degraded or lost altogether and for some sage-grouse populations to be wiped out. This benefits livestock, energy and other interests who profit enormously from pillaging the public lands. The more areas birds are wiped out, or pass the point of no return before sage-grouse are listed under the ESA, the less of a "problem" the bird is for industry.

When the agency is committed to ignoring protection of habitats and allowing new development to tear asunder habitats deemed critical to its survival, one has to wonder whether saving the species from extinction is really the plan.

WWP submitted extensive comments on the BLM's new environmental impact statements in March and will continue to fight for meaningful recovery and protection plans.

***Katie Fite is WWP's Biodiversity Director.
She lives in Boise, Idaho.***



*Drilling for Gas near Pinedale, Wyoming.
photo ©World Resources*



Grazing in Desert Tortoise Habitat in California

by Dr. Michael J. Connor

Livestock grazing on public lands is one of the few threats to desert tortoise survival and recovery that can be completely eliminated. Livestock grazing is incompatible with the recovery of the desert tortoise for many reasons including trampling, forage competition, increased predation, infrastructure impacts, changes in habitat, and the spread of invasive plants and weeds with concomitant increased fire risks.

The Mojave population of the desert tortoise was listed in 1989. In April 1991, the US Fish and Wildlife Service concluded that the BLM's ephemeral sheep grazing program in the California deserts would jeopardize the continued survival of the desert tortoise. BLM subsequently closed five domestic sheep allotments. In 2002 and 2006, amendments to the California Desert Conservation Area Plan closed the Ford Dry Lake Allotment (now the site of a proposed solar power plant) and made other sheep allotments available for buyout via voluntary relinquishment. However, so far, no buyouts have occurred.

In 1994, passage of the Desert Protection Act transferred management of several cattle allotments from the BLM to the National Park Service with the creation of Mojave National Preserve. Park Service policy is to eliminate livestock grazing through voluntary buyouts. Since 1994, six cattle allotments with desert tortoise habitat have been retired. However, grazing still continues on the Preserve in two allotments in desert tortoise critical habitat.

The California Desert Conservation Area Plan, as amended in 2002 and in 2006, ended ephemeral cattle grazing in desert tortoise critical habitat and allowed for buyout and voluntary relinquishment of specific allotments in desert tortoise habitat. Four BLM cattle allotments were bought out.

At the end of last year, the buyout option was essentially extended to all livestock grazing allotments in desert tortoise habitat in California under provisions included in the 2011 Appropriations Bill aimed at providing mitigation opportunities for energy developers.

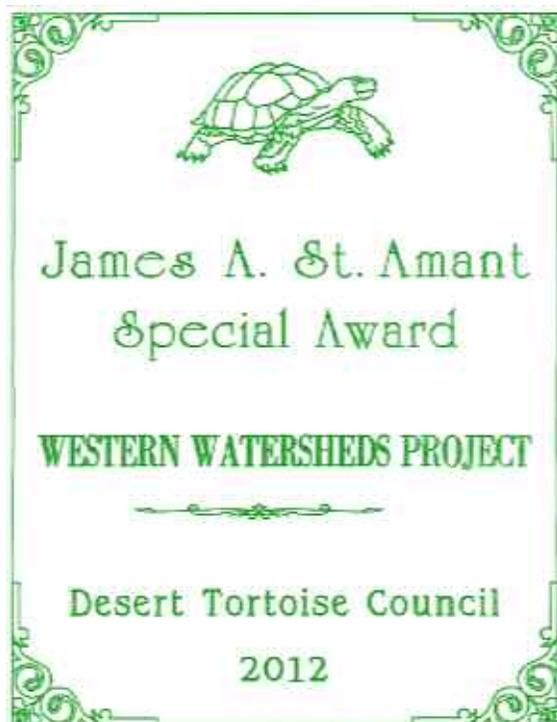
Authorized sheep-grazing continues to this day in California on some 2,292 square miles (1,466,880 acres) of desert tortoise habitat (see the table). Authorized cattle-grazing continues on 1,464 square miles (936,960 acres) of desert tortoise habitat on BLM and National Park Service lands including 849 square miles (543,360 acres) of designated critical habitat.

Square Miles of Desert Tortoise Habitat Grazed by Domestic Livestock in California.

Livestock Type	Critical Habitat (Square Miles)	All Habitat (Square Miles)
Cattle	849	1464
Sheep	11	695
Cattle & Sheep	0	132
Horse	1	1
TOTAL	861	2292

Although conservation buyouts of BLM and National Park Service allotments have occurred, grazing continues on a large area of desert tortoise habitat. The California experience shows that offering buyout opportunities is no panacea to reducing threats since it depends on willing and cooperative sellers. Some permittees have simply refused to even consider being bought out and others have demanded outrageous sums of money to do so. A number of the BLM's grazing allotments are "common" allotments that are grazed by multiple permittees who may disagree with each other. Reliance on buyouts to eliminate the threat posed by grazing is a slow and uncertain process.

***Dr. Michael J. Connor is
WWP's California Director.
He lives in Reseda, CA.***



***You Are Cordially Invited To The WWP
Annual Members and Board Meeting
May 12, 2012 at 11:00 A.M. M.D.T.
at the Greenfire Preserve, Clayton, Idaho***

***Please join us to learn the latest news about
WWP and our plans for the next year!***

***The Greenfire Preserve is located 7/10 of a
mile south of the intersection of State
Highway 75 and the East Fork Salmon River
Road about 4 miles east
of Clayton, Idaho. You will see the gateway
to the Greenfire House on your Left (east)
on the County road.***

***Lunch will be provided by WWP. The Board
and Members Meetings will be over around
4:00 P.M.***

***Please RSVP to the WWP Hailey Office:
208-788-2290
wwp@westernwatersheds.org***





The Range Con's ABCs by Greta Anderson

Anyone who has spent enough time in the field with a federal land management agency knows that livestock are rarely acknowledged as the cause of landscape degradation. Spend enough time with a range conservationist [sic] and you'll learn the BLM's basics of allotment ecology, the "Anything But Cows."

For example, on a recent trip to the Ironwood Forest National Monument in southern Arizona, participants learned that the widespread loss of perennial bunchgrasses is due to the Army buying "hay" from the Native Americans, roots and all, over one hundred years ago. Apparently, there was an article in the newspaper at the time that mentioned this, and it is the current reason being given by BLM employees for why few occur on the public lands. However, Saguaro National Park has plenty of bunch grasses, is closer to the former Army camps and has excluded livestock for decades. This was not explained.

Also, what the uneducated might attribute to livestock grazing, the wise know to be rabbits and rodents and deer and pronghorn and insects. They all like the "ice cream" plants too, you know, and have a special sense for the juicy ones along washes and in riparian corridors.

The excuse for the heavily incised washes with eroding banks and headcutting? BLM has to average the impacts over the entire landscape. Erosion needs to be widespread (i.e. not just in the valley bottoms) for it to rank as a violation of the Standard and Guidelines for Rangeland Health. In practice, this means that a heavily eroded channel averaged with a part of the allotment that never gets used equals achievement of the Fundamentals of Rangeland Health. It's fuzzy math, especially when the non-impacted areas of the allotment are difficult to find (and maybe nonexistent).

When confronted with livestock watering troughs that were missing wildlife escape ramps, BLM attributed this to scrap metal thieves. It couldn't be a lack of



Headcutting caused by "Anything But Cows."
photo ©Jonathan Ratner

conscientious land "stewards," so it must be that desperate people come out and take bird ladders. There was no explanation for why those people would leave the troughs and pipes and other range detritus.

BLM definitely doesn't want to address the conditions around a livestock water development. They need to go at least two miles away to evaluate the allotment health. The 2000 acres that lie within a 1-mile radius of a stock water are considered a sacrifice zone, a necessary evil of preserving the health of the land through the wonders of grazing "treatments." If there is stock water every couple of miles, it means that only the truly inaccessible parts of the allotment are protected. This often gets called "improved distribution," also known as equal opportunity degradation.

Finally, it seems that if there are problems that can't be attributed to Anything But Cows, remember this: If it is livestock grazing, it's certainly historic. Because really, unless you catch a cow in the act of trampling a stream bank, hedging a shrub, compacting the soils, and over-utilizing native species, it happened in the past, right?

**Greta Anderson is WWP's Deputy Director.
She lives in Tucson, Arizona.**



Arizona Jackrabbit: Not the Cause of Grazing Damage.
photo ©www.flickr.com/kretyen/



Splitting Rocks in Wyoming

by Erik Ryberg

Driving to the hearing for the Split Rock allotment in Laramie, Wyoming in late December, I wondered, "How could anyone make a living grazing livestock in this dry, freezing, unwelcome country?" The livestock industry is nothing if not tenacious.

Some might say that there is no such thing as a good case challenging the livestock industry in Wyoming and that it is basically impossible to get a fair shake against the BLM in a state so invested in the cowboy myth. But, I had a good feeling about this one and I continued to drive through howling, freeway-closing 50 mph winds and blowing snow to argue WWP's case.

Jonathan Ratner, WWP's Wyoming Director, had unearthed a number of damning documents from the BLM's files. It was no surprise to me that the Split Rock allotment had been dramatically overgrazed but it was surprising that the BLM's own documents had acknowledged this in a number of ways, including a thorough mathematical analysis that concluded there was approximately half as much grass on the allotment than was needed to support the number of cows the BLM sought to permit.

The BLM had been permitting excessive numbers on the allotment on for some time and the land reflected it. The vegetation on the allotment had become so poor that various employees had documented what they referred to as "widespread erosion" that had resulted in areas that "had their entire topsoil layer absent." The rancher had failed to meet BLM stubble-height requirements in seven of eight years. Vegetation was described as severely depleted, with much of the allotment at less than 20 percent of its potential productivity. One hundred percent of the allotment's riparian areas were functioning at risk and nearly all of them were in a downward trend.

Native fish had been found on the allotment in the 1970's but the last time anyone looked, in the mid-'80s, they had vanished. The water quality was categorized as "unknown." Apparently without fish present, the BLM had little incentive to investigate it.

The only BLM rangeland health standard the area met pertained to air quality and one had to wonder about airborne dust given the erosion problem.

Despite all this evidence of livestock damage, the BLM, after much fuss and negotiation with the rancher, selected a grazing alternative that would only very modestly reduce livestock numbers. The agency rejected a plan to gradually rest, pasture by pasture, the entire area for one full year at a time. Instead, the BLM



*The Split Rock Allotment.
photo ©Jonathan Ratner*

elected to incorporate a complex and unfunded monitoring program to see if perhaps some kind of change might occur and the landscape would heal on its own. It was a triumph of magical thinking.

If you have to take a case against the BLM and the cowboy myth in Wyoming, it may as well be this one. There was a clear inability for the ecosystem to withstand the number of cows the rancher said he required.

The hearing went well. The judge zeroed in on the agency's dependence on monitoring to improve conditions and even interrupted one opposing counsel to ask why monitoring alone was expected to improve things even though the BLM has known for years that this allotment is in vegetative decline. He pointed out from the bench that the problem is not a lack of knowledge but a lack of enforcement and that the BLM has always had the ability to address these problems.

In the end, however, he disappointed us. His order simply restated the government's arguments and showed no hint that he understood how cravenly the BLM was catering to the narrow interests of the rancher over the needs of the landscape. It is, after all, Wyoming.

We have appealed to the Tenth Circuit Court of Appeals.

Erik Ryberg serves as WWP's Arizona Legal Counsel. He lives in Tucson.



"We reached the old wolf in time to watch a fierce green fire dying in her eyes. I realized then, and have known ever since, that there was something new to me in those eyes—something known only to her and to the mountain. I was young then, and

full of trigger-itch; I thought that because fewer wolves meant more deer, that no wolves would mean hunters' paradise. But after seeing the green fire die,

I sensed that neither the wolf nor the mountain agreed with such a view."

-Aldo Leopold
A Sand County Almanac

Don't let the fire die.



**Lemhi River Settlement
Creates Whitewater!**
by Larry Zuckerman

In 2001, WWP and Advocates For The West entered into a legal challenge (WWP v Matejko) questioning how the Forest Service and BLM administers irrigation diversions, stock water, ditches, pipelines and other water conveyances in the Upper Salmon River Basin of Idaho. The agencies are supposed to adhere to the Endangered Species Act and consult with the National Marine Fisheries Service (NMFS) and U.S. Fish and Wildlife Service (FWS) – and still meet their affirmative conservation and recovery responsibilities to ESA-listed species such as the endangered Snake River sockeye salmon and threatened Columbia Basin bull trout, Snake River Basin steelhead, and Snake River spring/summer Chinook salmon.

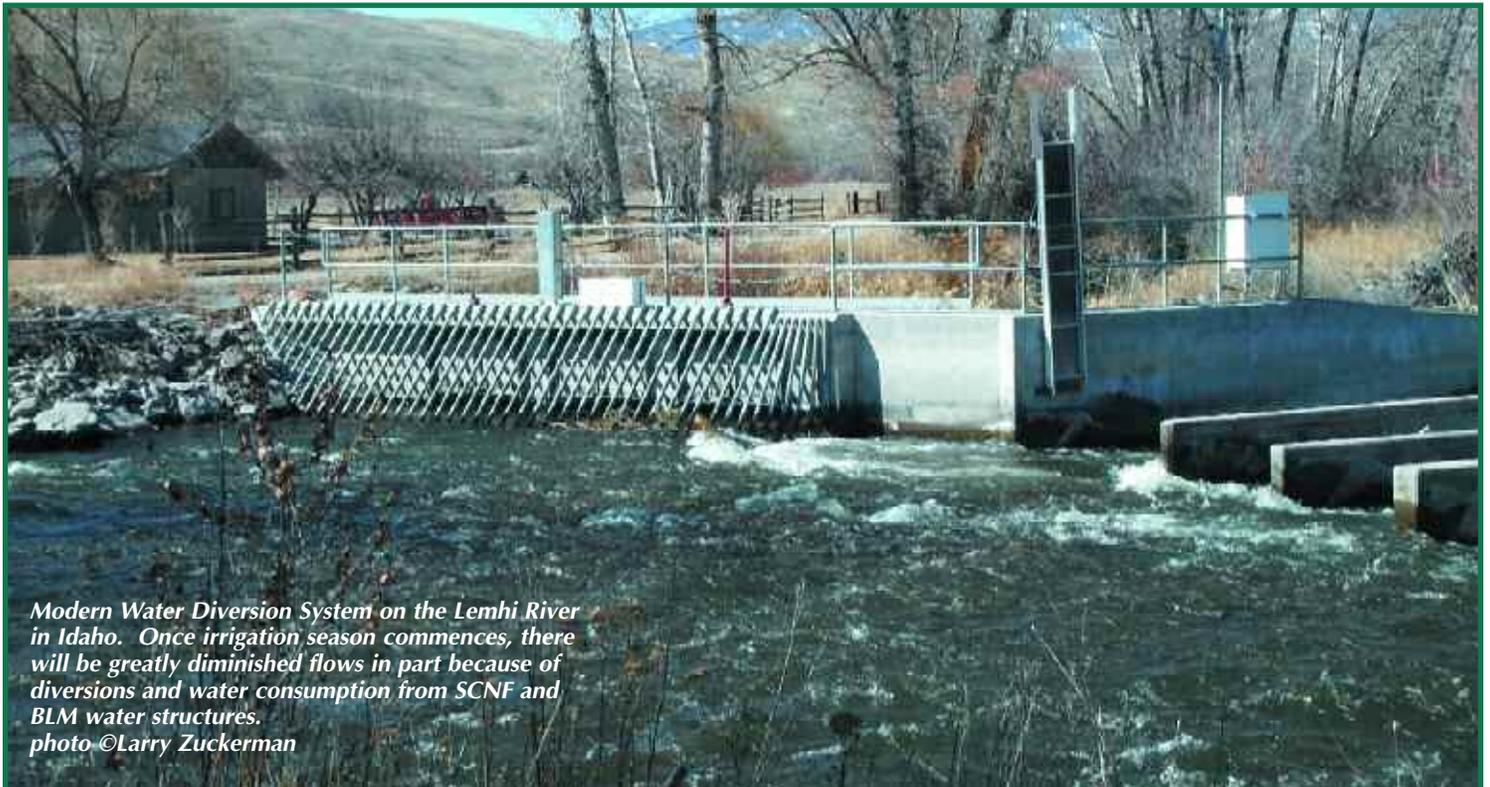
Long story short: WWP sued the Forest Service and BLM in Federal District Court of Idaho. The BLM won in the 9th Circuit Court of Appeals but the Forest Service decided to settle the issue rather than fight WWP. The Salmon-Challis National Forest agreed to consult with the FWS and NMFS regarding water diversions and to set bounds for



*Chinook Salmon
photo ©NOAA*

construction and maintenance of dams, diversions, ditches and pipelines that would favor the conservation and recovery of ESA-listed salmonids and would not adversely modify their critical habitats.

The outcome of the Forest Service consultation was entirely unexpected and a positive development for native fish. The NMFS answered back with a “Jeopardy” opinion for water diversions along the Lemhi River. Jeopardy Opinions are very rare, but they mean that an agency’s plan would put a species in jeopardy of extinction. In this case, it means that instead of proceeding with the original plan the Salmon-Challis National Forest must instead consider measures that would allow for instream flows in



*Modern Water Diversion System on the Lemhi River in Idaho. Once irrigation season commences, there will be greatly diminished flows in part because of diversions and water consumption from SCNF and BLM water structures.
photo ©Larry Zuckerman*

the Lemhi River and its tributaries. The Forest also must eliminate fish passage barriers like pushup dams that have been rebuilt annually using heavy equipment and affecting important habitat components. It means the agency must also ensure that water diversions comply with decades-old state laws requiring fish-friendly headgates on water diversions that won't leave native fishes high and dry at the end of the irrigation season, sucked against irrigation screens or subject to easy predation by osprey, kingfisher, mink, raccoon and other piscivores.

In addition to requiring these protective measures, the NMFS went a step further and explained that the impacts of agency actions are not only in the Lemhi River Basin but are felt downstream in the Salmon River, Snake River, Columbia River, downstream to the Pacific Ocean and it affects many more listed fishes than just those of the Upper Salmon River Basin. This reflects a truly "watershed" view of these important ecosystems.



*Fish Ladder at Bonneville Dam on the Columbia River.
photo ©www.flickr.com/j3net/*

After a decade of fighting for this outcome and with such strong precedent from the agencies, WWP is looking at similar legal action in the East Fork Salmon River, Morgan Creek, Pahsimeroi River, Upper Salmon River, Panther Creek, Middle Fork Salmon River, North Fork Salmon River and the Yankee Fork Salmon River.

Fish need water. It's great that the imperiled salmon and trout of the Lemhi River Basin are going to get it.

Larry Zuckerman is a fisheries biologist who lives in Salmon, Idaho

Western Watersheds Project 2011 Annual Financial Report

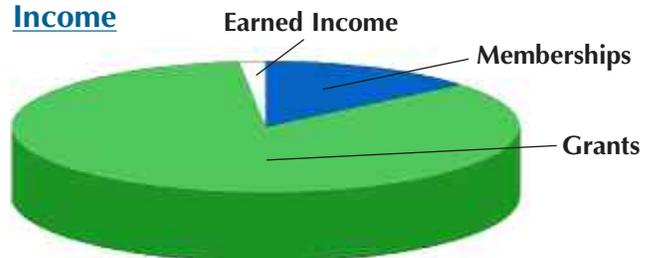
Income

Memberships and Contributions	\$228,700.00
Grants	\$1,406,800.00
Events and Earned Income	\$26,700.00
Total Income	<u>\$1,662,200.00</u>

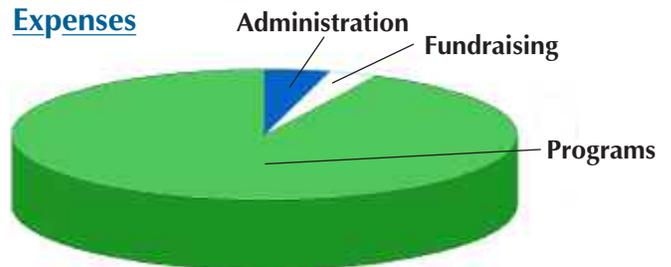
Expense

Accounting	\$3,300.00
Bank Charges	\$5,500.00
Conferences & Meetings	\$800.00
Contract Services	\$73,500.00
Equipment Rental & Maintenance.....	\$2,500.00
Insurance	\$6,100.00
Legal	\$157,500.00
Occupancy	\$23,100.00
Payroll.....	\$404,600.00
Payroll Expenses	\$31,200.00
Postage & Shipping	\$8,100.00
Printing & Publications	\$120,300.00
Grazing Leases	\$300.00
Program Expense	\$500.00
Supplies.....	\$5,300.00
Telephone	\$10,000.00
Travel	\$27,900.00
Website	\$1,600.00
Total Expense	<u>\$882,100.00</u>
Net Income	<u>\$780,100.00</u>

Income



Expenses





Oversight

By Jonathan Ratner

The Merriam-Webster dictionary defines the word “oversight” in these ways; (1) a: watchful and responsible care . b: regulatory supervision, as in congressional oversight. (2): an

inadvertent omission or error.

The Grand Staircase Escalante National Monument (GSENM) was established by Presidential proclamation in 1996. The Monument Management Plan describes this amazing area:

“The stunningly beautiful lands within this Monument contain spectacular treasures of natural and human history. This high, rugged, and remote region, where bold plateaus and multi-hued cliffs run for distances that defy human perspective, was the last place in the continental United States to be mapped. From its spectacular Grand Staircase of cliffs and terraces, across the rugged Kaiparowits Plateau, to the wonder of the Escalante River Canyons, America’s newest Monument spans nearly 1.9 million acres of land owned by the American public.”

Unfortunately, management of the GSENM was left to the BLM, an agency not known for its ‘responsible care’ of much of anything other than the industries that benefit from the transfer of public resources to private profit. More than a decade and a half has passed since its establishment but the GSENM continues to be managed much like the rest of the BLM lands where resource extraction takes priority.



Rillcuts: Devastation caused by grazing. photo ©Jonathan Ratner

The 1999 Monument Management Plan punted dealing with livestock issues down the road. Half a decade later, the BLM conducted Rangeland Health Assessments in preparation for a Management Plan Amendment to provide direction for livestock management within the monument. Most of the monument’s grazing allotments were found to be in violation of Rangeland Health Standards. One would assume that the ‘watchful and responsible’ agency with oversight of the lands in question would jump into action, as required by its own regulations, to correct the problems it had found. But, what happened? Nothing.

In 2009, Wild Utah Project submitted a Freedom of Information Act (FOIA) request for the documents regarding the failures of Rangeland Health Standards. The BLM responded by sending documents for only a few of the failing allotments. Apparently the Utah BLM State Office didn’t like that much of the GSENM failed Rangeland Health Standards and buried most of the

Landscape and Rock Formations in the Grand Staircase Escalante National Monument. photo ©www.flickr.com/acordova



other documents. Another FOIA request was sent telling the BLM where it could find the hidden documents. The BLM subsequently provided the documents with a letter explaining that 'an inadvertent omission' had occurred.

The regulations under which the BLM operates require that:

"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" 43 CFR 4180.2(c)

Unfortunately, nearly 6 years have elapsed since the BLM determined that livestock grazing was a significant factor in the failing of Rangeland Health Standards, but the BLM has yet to implement the 'appropriate actions' required by the regulations.

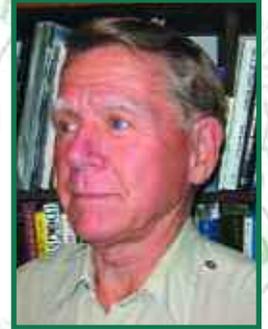
Once again, WWP will need to exercise its oversight responsibilities and use the law to force the agency to do what its own regulations require and truly protect the spectacular landscapes of the GSENM from livestock abuse.

Jonathan Ratner is Wyoming, Utah and Colorado Director for WWP. He lives in Sublette County Wyoming.

CHOOSING A CONSERVATION VOCATION OR A BUREAUCRATIC CAREER

Personal Choices and the Environmental Consequences

Richard Kroger is the author of this book about why government conservation and environmental and land management agencies do such a poor job of protecting and managing our public natural resources. The book also addresses how non-profit conservation groups and individual vocationists can become more successful in preventing environmental degradation caused by bureaucratic careerists.



More information is available at rtconnect.net/~krogers or by calling (307) 347-3047.

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Your donation, matched by a grant from Earth Friends Conservation Fund, helps Western Watersheds Project challenge policies that endanger the West's wildlife and fisheries habitat.

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WESTERN WATERSHEDS PROJECT

WWP extends special thanks to the following supporters, each of whom contributed \$100 or more to our efforts since the last newsletter. This generous assistance helps to preserve and restore habitat for many species.

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Prairie Dog.
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^ "She repeatedly referred to bison as "bio-terrorists." She also insisted that what was at stake were children in playgrounds at risk of incurable undulant fever -- which became a non-issue when we started pasteurizing milk in the 1940s." - Page 1