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March 20, 2018

Dear Director Suazo,

We, the undersigned individuals, urge you to retain the ecological integrity and scientific value of the San Pedro Riparian National Conservation Area (SPRNCA) through continued livestock exclusion. Following its establishment in 1988, livestock were excluded from the SPRNCA, after centuries of use for resource extraction, to protect and enhance its riparian ecosystems. While there are still four allotments within the SPRNCA with permitted livestock grazing, and persistent instances of trespass livestock, grazing has been reduced within and adjacent to the river channel and on the terrestrial uplands.

In advance of the summer release of the Resource Management Plan/Draft Environmental Impact Study (RMP/DEIS), we wish to apprise you of what we – as scientists with experience and knowledge of the San Pedro River ecosystem – believe is at stake in the Bureau of Land Management's planning process: if livestock grazing in the SPRNCA is reauthorized, not only will many aquatic and riparian species and ecosystem functions be jeopardized but the critically important role of this Conservation Area as an ecological reference site will be lost.

The SPRNCA has provided scientists with the regionally unprecedented opportunity to document long-term patterns of riparian ecosystem change (and recovery) following livestock exclusion, patterns which play out on time scales of decades to centuries. Other site-specific scientific research has documented the beneficial impacts to vegetation, avian communities, and regional economy of livestock exclusion. In contrast, although there is evidence that certain species affiliated with open disturbed conditions will increase under livestock grazing, the primary beneficiary of continued or re-instated grazing is the permittees.

Because of its large size and status as a conservation area, the San Pedro in the SPRNCA has become the most frequently studied river in the Southwest. The remarkable scientific value of this river accrues from its ungrazed status combined with absence of the large diversion dams that modify so many waterways. The ability to eliminate grazing and impoundment as confounding factors has allowed scientists to utilize the SPRNCA to understand riparian ecosystem dynamics and to examine effects of other regionally important stressors including stream dewatering, drought, and climate change. Studies within the SPRNCA have, to date, yielded valuable information on the environmental flow needs of various taxa and ecosystems, the ecological importance of perennial and intermittent stream flows, and the importance of flooding as an ecosystem disturbance. These and other research opportunities will no longer be available should grazing be reinstated.

Livestock grazing impacts on the SPRNCA must, of necessity, be considered within the context of increasing aridity and temperatures in the Southwest. As the BLM is aware, climate

models predict hotter and drier weather for the project area. Any anthropogenic impacts in the SPRNCA must be addressed as cumulative stressors on its resident plants, animals, and ecosystems. Many scientific studies urge land managers in arid and semi-arid regions to reduce or eliminate livestock grazing as a means of counteracting the adverse effects of increasing climatic aridity. Water is a critical ecological element in drylands, and livestock (in terrestrial uplands and riparian lowlands of the watershed) are well known to influence the hydrologic cycle. If the new RMP/DEIS authorizes continued or increased levels of livestock grazing, there will be adverse impacts not only to water quantity but to water quality, as well. Not only would water be diverted to stock ponds that would otherwise be available to other organisms, but the actions of the cattle would compact soils (inducing more runoff and less infiltration) and reduce the abundance of the streamside plants which function to improve water quality.

We assume that science will be adequately integrated into the draft RMP/DEIS to promote understanding of the impacts of livestock grazing and allow the BLM to fulfill its task of “conserving, protecting, and enhancing” the resources of the SPRNCA. We anticipate that the document will provide a scientific foundation for the proposed decisions and that this scientific information will be made available to the public. If continued livestock grazing on the SPRNCA is recommended in any alternative, we expect that BLM will make publicly available all range science purporting to show that livestock grazing conserves, protects, and enhances the aquatic, wildlife, archeological, paleontological, scientific, cultural, educational, and recreational resources of the public lands. Without this information in the project record and readily available for public review, the BLM should not and cannot consider introducing or continuing to allow livestock grazing in the SPRNCA.

We thank you for taking the time to review our concerns.

Sincerely,

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