

Blanchard, Cheryl L

From: Basham, Matthew P
Sent: Friday, April 10, 2020 9:13 AM
To: Buttazoni, Brian L; Blanchard, Cheryl L
Cc: Kender, Edward J; Neckels, Jacqueline D; McKinley, Karen A
Subject: SDNM livestock grazing RMPA-EA comment

Brian and Cheryl,

The treatment of of cultural resources in this EA is outstanding. Concise, and characterizes the resources for the reader, rather than "thick descriptions" of individual sites. I have been advocating for this approach for some time now.

I do have one comment.

In a couple of instances, you use the language "adverse, negligible to minor, and long-term impacts" (in section 3.5.6).

I would suggest that you not use the term "adverse" for three reasons:

1. The term is germane to Section 106, and not all adverse effects in 106 rise to the level of significant impacts in NEPA.
2. On a linguistic level, to the common reader, the term "adverse" would seem to contradict the terms "negligible to minor"; an antonym so to speak.
3. Through active range management, adverse effects can be mitigated by strategic placement of waters, mineral and salt lick placement, or by installation of physical barriers or other techniques, if needed.

In sum, I have never thought that livestock grazing results in adverse effects in the 106 process, if the allotments are properly managed. I have always made findings of No Historic Properties affected for livestock grazing activities.

Let me know if we receive any challenging comments re: cultural during the comment period and I can assist, if needed.

Great work,

Matt

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