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U.S. Forest Service

Forest and Rangelands Management and Vegetation Ecology

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Washington, DC 20250

RE: The “Futuring” of Livestock Management on federal public lands managed by the USFS

It has come to our attention that the USFS has initiated an unofficial process to determine the future of the range management program. This initiative has included no official notice or comment opportunity for the general public and interested parties. Thus far, the USFS has only solicited informal input from grazing permittees, a selected few NGOs and federal government agency “stakeholders”, Native American Tribes and USFS agency personnel. Nevertheless, as this is the only opportunity at this stage of the process by which the USFS will voluntarily examine the range program and take comment from the interested public, we submit the following for your consideration.

The USFS “futuring” of the rangeland program must address all five of the following issues to halt and reverse the degradation of ecosystem services and loss of biodiversity on Western National Forests that is largely due to the impacts of past **and** current authorized livestock grazing.

- **Rangeland is more than grass forage.** Grazed lands include creeks, springs, wetlands, riparian areas, meadows, nesting sites, hibernacula, archeological sites, habitat for uncommon species, and more. The USFS is tasked with managing all the public’s lands and resources. Rangeland management, however, regards all ecosystems as “rangeland” and focuses on availability and use of grass forage by livestock.
- **Increasing heat, drought, and aridity are depleting resources.** National Forests of the West were established in large part to protect community watersheds and water. The West is presently in the midst of a 22-year long drought, the most extreme in the last 1,200 years. Increasing drought and heat are depleting water sources and depressing productivity of plants and wildlife. Livestock grazing is a drought/aridification intensifier – making a bad situation worse by damaging watershed function and further aridifying the Forests. The USFS has made few adjustments to stocking rates due to aridification. No policy or process is systematically used by USFS livestock managers to adjust permits amid long-term increased aridification and reduced productivity.
- **Utilization monitoring focuses on livestock forage.** The upper portions of grasses are the most essential for small mammal, bird and insect species, and yet the typical 50% -

60% allowable utilization by weight allows for 100% removal of the flowering and seeding bodies of the plants being monitored. Seventy percent retention of grasses by weight (which retains a majority of flowers and seeding bodies), is required to support pollinators, seed-eating birds, canopy cover for small mammals, amphibians, and ground-nesting birds. If such species are considered at all in range management, it is those few that are listed as nearing extinction.

- **Exclusion of NEPA = exclusion of the public.** Agencies are misusing the authority of FLPMA 402(c)(2) to issue permits where NEPA has not been completed. The USFS is using this authority to functionally eliminate NEPA from permitting decisions. Doing so results in retention of current management (e.g., numbers and species of grazing animals; and grazing season, rest, and frequency) irrespective of a need for change or new management to reduce harms. The exclusion of NEPA removes all opportunity for the public to participate in the permitting process as advocates for such values as water, pollinators and native plants. What we are left with is essentially private ranch management on public lands by permittees and range land managers.
- **Degradation is normalized.** Rangeland monitoring and management decisions allow for reductions in ecological condition and loss of biodiversity. Plants that are not considered important for livestock forage are allowed to decline and become locally extirpated without consideration. This is particularly true of native perennial forbs which are largely ignored or devalued (and thus their native pollinators) and a diversity of native bunchgrasses. We see key species of forage plants become so uncommon they cannot be adequately monitored. For example, as bluebunch wheatgrass, a key species favored by livestock becomes rare, a grass more resistant to grazing, such as blue grama, squirreltail, or a seeded pasture grass is chosen by range managers to be the new key species. Yet these species do not provide the same value to pollinators and other wildlife. The Forest Service is required under law to maintain viable populations of all native species. Rangeland management must also meet this requirement both now and into the future.

In addition to your consideration of the points above, we request that the USFS formally solicit public comment on the range “futuring” initiative and hold in-person and/or virtual meetings throughout the western states.

Respectfully submitted on behalf of the following organizations and individuals,

Advocates for Snake Preservation
Aldo's Silver City Broadband of the Great Old Broads for Wilderness
Caldera Action
Center For Biological Diversity
Los Padres ForestWatch
New Mexico Sportsmen
Project Eleven Hundred

Public Employees for Environmental Responsibility (PEER)
Rio Grande Indivisible
Sierra Club Grazing Team
Upper Gila Watershed Alliance
Western Watersheds Project
WildEarth Guardians
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