

January 28, 2021

Robert Bonnie

Deputy Chief of Staff for Policy and Senior Advisor, Climate, in the Office of the Secretary
United States Department of Agriculture

Dear Mr. Bonnie:

Re: Proposed Revisions to Forest Service Range Management Directives

The U.S. Forest Service issued proposed revisions to directives that govern range management on December 18, 2020, over six weeks after the election, and set a deadline for public comment on February 16, 2021, less than a month after the inauguration. It is our understanding that the revision process will continue under this timeline despite the Biden Administration's "Regulatory Freeze Pending Review" memorandum from January 20, 2021, put into place specifically to "ensure that the President's appointees or designees have the opportunity to review any new or pending rules," including guidance documents such as the range management directives.¹ Going forward with the revision at this time conflicts with the intent and spirit of the memorandum. The proposed changes reflect the previous administration's desire to weaken public lands management oversight and block actions to combat the unfolding climate and biodiversity crises. We urge you to terminate the current process immediately and consider extensive, science-based livestock grazing management policy reform that tackles climate change—a Biden administration priority—and promotes ecosystem, water, and wildlife protection.

While we understand the Forest Service's desire to update certain grazing directives given the agency's handbooks on range management are nearly 30 years old, we have concerns about the timing and structure of this process, as well as the breadth and substance of the proposed revisions. Livestock grazing policy on National Forest System lands indeed needs to change. Yet, the scope of the proposed changes is unreasonably narrow, fails to include an analysis of climate and other environmental impacts, does not include a range of alternatives, and limits an appraisal of livestock grazing management policy by the public.

Compliance with the prescribed sustainable use of lands open to livestock grazing, obligation to conserve wildlife, and other requirements under the National Forest Management Act and Multiple-Use Sustained-Yield Act necessitates modifications in both grazing policy and practices. Resilience to higher temperatures, soil aridification, extreme weather events, changes in precipitation patterns, as well as fire, all beg a long-overdue, comprehensive review of current grazing activities and administration.

We request the administration withdraw the proposed grazing directives and take a fresh look at how best to change livestock grazing policy on the national forests and grasslands once USDA appointees have settled into their roles and have the opportunity to assess the issues involved.

Thank you very much for considering this request. Please feel free to Josh Osher (josh@westernwatersheds.org) with Western Watersheds Project with any questions.

¹ See Memorandum for the Heads of Executive Departments and Agencies from Ronald A. Klain, Assistant to the President and Chief of Staff, *Re: Regulatory Freeze Pending Review* (Jan. 20, 2021), available at <https://www.whitehouse.gov/briefing-room/presidential-actions/2021/01/20/regulatory-freeze-pending-review/>.

Sincerely,

Josh Osher
Western Watersheds Project

Zack Strong
Animal Welfare Institute

Chris Bugbee
Center for Biological Diversity

Gary Macfarlane
Friends of the Clearwater

Mike Popejoy
Grand Canyon Trust

Shelley Silbert
Great Old Broads For Wilderness

Bobby McEnaney
Natural Resources Defense Council

Thomas Jervis
New Mexico Audubon Council

Oscar Simpson
New Mexico Sportsmen

Logan Glasenapp
New Mexico Wild

Mark Salvo
Oregon Natural Desert Association

Camilla Fox
Project Coyote

Mary O'Brien
Project Eleven Hundred

Oscar Simpson
Rio Grande Indivisible

Felice Pace
The Grazing Reform Project

Chris Bachman
The Lands Council

John Davis
The Rewilding Institute

Madeleine Carey
WildEarth Guardians

George Nickas
Wilderness Watch