

July 16, 2021

The Honorable Tom Vilsack
Secretary of Agriculture
U.S. Department of Agriculture
1400 Independence Ave., S.W.
Washington, DC.

Dear Secretary Vilsack:

A 20-year mega-drought is gripping much of the western United States.¹ The undersigned organizations and our millions of members and supporters are writing to request that the U.S. Department of Agriculture (USDA) issue an emergency directive requiring all national forests and grasslands that are experiencing multi-year drought to substantially reduce stocking of livestock to relieve pressure on native biodiversity and natural resources. We also request that the USDA initiate a formal rulemaking process as soon as possible to develop comprehensive regulations for the USFS grazing program that combats the climate crisis and conserves and protects national forest lands, biodiversity, and natural resources. Regulations, subsequent policy and management directives must include mandatory provisions to address grazing during periods of extended drought.

In its March 21, 2021 press release on USDA's Climate-Smart Agriculture and Forestry Strategy, the USDA indicated it is committed to protecting biodiversity and natural resources, including water:

“USDA is engaged in a whole-of-government effort to combat the climate crisis and conserve and protect our nation’s lands, biodiversity, and natural resources, including our soil, air and water.”²

Biodiversity is simply all the plants and animals and their ecosystems on the national forests. These include the photosynthesizers (primary producers - vegetation), herbivores (primary consumers), carnivores/omnivores (secondary consumers), and top carnivores as well as the decomposers/soils. As drought is a significant reduction of water upon which the vegetation depends for serving as primary producer for all other species, the production and/or survival of nearly all species is reduced.

The Forest Service acknowledges forage production impacts of drought on rangelands. For instance in the 2019 publication, *Effects of Drought on Forests and Rangelands in the United States: Translating Science into Management*, the Forest Service notes that “higher temperatures interact with drought to exacerbate moisture limitation and water stress”³ and “(d)rought in rangelands reduces forage and water available for livestock grazing and reduces overall vegetative land cover, which can lead to soil loss from wind and water erosion with long-term effects on rangeland productivity.”⁴ The Forest Service does not, however, mention or describe the tight linkage between continued livestock

¹ “. . . [T]he 2000–2018 [Southwestern North American] drought was the second driest 19-year period since 800 CE, exceeded only by a late-1500s megadrought.” Williams, AP, ER Cook, JE Smerdon, BI Cook, JT Abatzoglou, K Bolles, SH Baek, AM Badger, and B Livneh. 2020. Large contribution from anthropogenic warming to an emerging North American megadrought. *Science* 368:314-318.

² USDA. March 21 Press release, USDA Requests Information on USDA's Climate-Smart Agriculture and Forestry Strategy.

³ Effects of Drought on Forests and Rangelands in the United States: Translating Science into Management, p. 8.

⁴ Effects of Drought on Forests and Rangelands. p. 12

consumption of reduced plant production and further depletion, rather than conservation, of all other herbivores and carnivores on the national forests.

The Forest Service publishes information indicating that drought is occurring on the livestock-grazed national forests, e.g., U.S. Drought Monitor⁵ and [Rangeland Production Monitoring Service](https://www.fs.usda.gov/rmrs/front-page-highlights/rangeland-production-monitoring-service).⁶ The agency acknowledges that attention to management of livestock grazing can be urgent amid drought, noting that “degradation can occur quickly if drought occurs and grazing persists”⁷ and that “for drought management strategies to be most effective, timely implementation is needed across large spatial scales.”⁸

However, the Forest Service does not have livestock drought management strategies that include conservation and protection of the national forests’ lands, biodiversity, imperiled species, and other natural resources. In many cases, forest plans are decades old with outdated utilization standards. The 10-year permit renewal system was not designed to respond to the rapid-onset, increasingly frequent severe drought conditions being experienced today.

Without sufficient drought response mechanisms, the national forests continue to allow heavy consumption of drought-depleted vegetation by authorizing livestock numbers that are incorporated in permits, most of which were developed without consideration of increasing drought or heat. Range management decisions are often made in isolation from other resource specialists and do not address the impacts to other national forest resources including native plants and wildlife.

A few examples include the following:

- On March 23, 2021, after (1) a severe drought in 2018; (2) the driest year in Utah history in 2020; and amid March 2021 extreme drought (D3; U.S. Drought Monitor, second most severe category of drought) and U.S. Drought Monitor predictions of continued drought through the summer (as of July 8, 2021 the allotment is in D4, exceptional drought, the most severe category of drought), the Richfield Ranger District of Fishlake National Forest authorized the grazing of full permit numbers on its largest allotment (i.e., 787 cow/calf pairs, the same number authorized since at least 2010), with only a 2-week delay of the June on-date.⁹
- The 2021 Annual Operating Instructions for the Dixie National Forest of southwestern Utah continue to remind permittees that they have to request permission 30 days in advance in order to run less than 90% of permit numbers and that they are limited to four years in ten to request nonuse.¹⁰
- In 2020, Northern California’s Klamath National Forest authorized the full permitted number of livestock. Managers ordered early removal of livestock from the grazing allotments when

⁵ <https://usdroughtmonitor.unl.edu>

⁶ <https://www.fs.usda.gov/rmrs/front-page-highlights/rangeland-production-monitoring-service>

⁷ Effects of Drought on Forests and Rangelands P. 12

⁸ Effects of Drought on Forests and Rangelands P. 2 <https://www.fs.usda.gov/rmrs/front-page-highlights/rangeland-production-monitoring-service>

⁹ US Drought Monitor for Utah March 23, 2021 in U.S. Drought Monitor Archive at <https://droughtmonitor.unl.edu/Maps/MapArchive.aspx>

Annual Operating Instructions for Koosharem Allotment signed on March 23, 2021 available at <https://www.fs.usda.gov/detail/fishlake/landmanagement/resourcemanagement/?cid=FSEPRD918628>

¹⁰ See, e.g., 2021 Annual Operating Instructions for Pine Valley Ranger District at <https://www.fs.usda.gov/detail/dixie/landmanagement/resourcemanagement/?cid=fseprd918031>

forage vegetation had been totally utilized, resulting in significant grazing impacts to riparian vegetation and streambanks, including excessive browsing, shade removal and bank trampling. However, land managers did not enforce the removal order and while livestock removal began a month before the typical date, complete removal of livestock did not occur until a month or even two months later, exacerbating impacts on national forest land.¹¹

To summarize, we propose two actions that would help conserve and protect biodiversity and natural resources on the national forests:

1. Issue an emergency directive requiring all national forests and grasslands that are experiencing multi-year or D3 or D4 drought to sufficiently reduce stocking of livestock to protect the forests' native species and natural resources.
2. Initiate a formal rulemaking process as soon as possible to develop comprehensive regulations for the Forest Service grazing program that combat the climate crisis and conserve and protect national forest lands, biodiversity, and natural resources.

We hope to hear your thoughts on this climate-based concern and our proposed actions.

Sincerely,



Joshua Osher
Public Policy Director
Western Watersheds Project

And on behalf of:

American Horse Protection Society
American Wild Horse Campaign
Animal Legal Defense Fund
Animal Wellness Action
Animal Wellness Foundation
Bozeman Birders
Center for a Humane Economy
Center for Biological Diversity
Climate and Biodiversity Listserv
Cottonwood Environmental Law Center
Craighead Institute
Defenders of Wildlife
Endangered Species Coalition
Environmental Protection Information Center

¹¹ Supporting data obtained through Freedom of Information Act requests is available upon request.

Friends of the Bitterroot
Friends of the Clearwater
Friends of the Sonoran Desert
Gallatin Wildlife Association
Grassroots Coalition for Wild Horses and Burros
Grazing Reform Project
Great Old Broads for Wilderness
Klamath Forest Alliance
Los Padres ForestWatch
Natural Resources Defense Council
Oceanic Preservation Society
Oregon Natural Desert Association
Project Eleven Hundred
Public Employees for Environmental Responsibility (PEER)
San Juan Citizens Alliance
Sequoia ForestKeeper®
Sierra Club
The Cloud Foundation
WildEarth Guardians
Wilderness Watch
WildLands Defense
Yellowstone to Uintas Connection

Cc:

Forest Service Chief, Vicki Christiansen
Incoming Forest Service Chief, Randy Moore
USDA Deputy Undersecretary for Natural Resources and Environment, Meryl Harrell
USDA Deputy Chief of Staff for Policy and Senior Advisor, Climate, Robert Bonnie
Council on Environmental Quality, Chair, Brenda Mallory
House Committee On Natural Resources, Chairman, Rep. Raul Grijalva
Senate Committee on Energy and Natural Resources, Chairman, Sen. Joseph Manchin