



# **U.S. Forest Service Grazing Management Assessment**

CONDUCTED AND COMPILED BY

**California Trout**

**California Native Plant Society**



**U.S. Forest Service  
Grazing Management  
Assessment**

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# Summary of Preliminary Results

**F**or the past two years, California Native Plant Society (CNPS) and California Trout (CalTrout) have conducted focused research and advocacy on California's United States Forest Service (USFS) Grazing Management Program. The project was funded by two Compton Foundation Grants, as well as by grants from generous CNPS and CalTrout members. The project had four components:

❖ **Sunshine Project.** This project is an ongoing effort to increase transparency in USFS grazing management by expanding public access to monitoring data. Our goal is to use public scrutiny of livestock program administration to increase agency monitoring and improve on-the-ground management.

This project has been extremely successful. Both the USFS and the Bureau of Land Management (BLM) now provide the public with annual summaries of monitoring results for livestock use of forage and impacts to riparian areas. As we hoped, the frequency of monitoring has increased as reports have been compiled and published. For example, the USFS reported that it monitored approximately 71% of its active grazing allotments in 1998. This percentage jumped to 86% by the 2000 field season.

Some new monitoring has also been due to our successful lobbying of Congress. We have augmented California's USFS grazing monitoring budget, by almost \$1 million

over the 1999 and 2000 field seasons. This funding has contributed to increased annual use monitoring and funded installation of more than 350 new ecosystem health study plots on California National Forest lands. These will be used to monitor long term changes in plant community health and composition.

However, more work is needed. Too many allotments are still monitored by visual estimates rather than by quantitative measurement. Many are monitored by cursory inspection of only a small percentage of allotment acreage. The Forest Service has committed to continued improvement in monitoring methods and to increased monitoring frequency. We will continue close scrutiny of the program to ensure that this occurs.

❖ **Field Investigation Of Problem Areas.** We selected 4–5 focal grazing allotments on three National Forests: Sequoia, Plumas, and Stanislaus. We focused on National Forests and allotments with sensitive resources such as rare species or designated wilderness, and with known histories of resource damage and/or poor grazing administration. We used the Freedom of Information Act (FOIA) to request detailed information on the status and trend of ecosystems on the focal allotments, and to investigate compliance with Forest Plan standards and guidelines for sensitive species and ecosystem health. We also hired range specialists to perform field



Oncorhynchus mykiss aguabonita (California Golden Trout)  
illustration by Joseph Tomelleri  
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reviews of ecosystem condition as well as standard and guideline compliance in the focal allotments.

The primary finding was that USFS has often failed to perform required monitoring of ecosystem health. USFS Forest Plans and regulations set high standards for the quality and quantity of information that must be maintained on the status and trends of National Forest resources. Unfortunately, USFS records often contained incomplete or obsolete information on riparian health, water quality, plant community structure, species composition and trend, or sensitive plant and wildlife populations. Field investigation showed that the quality of management varies widely. However, most focal allotments failed to meet one or more goals of their allotment management plans, National Forest Management Plans or other rules. Bare soil, excessive grazing of woody species—particularly riparian species and oaks, and damaged streambanks were commonly observed. We have reported these results to the appropriate USFS offices and are working with the agency to correct these problems.

⌘ **NEPA Status Review.** We reviewed USFS compliance with legal requirements for management planning and environmental analysis under the National Environmental Policy Act (NEPA). As expected, the USFS is far behind schedule in performing the environmental reviews and updates of grazing management plans required by the National Environmental Policy Act. There are approximately 700 active grazing allot-

ments on California National Forests. According to a Congressionally mandated schedule, by January 2001, USFS Region 5 (California) should have completed NEPA analyses and management plans for 432 allotments. In fact, only 143 allotments were NEPA compliant as of January, representing a 33% compliance with the Congressional schedule. This is unfortunate because NEPA analysis is essential to proper land management.

It mandates an impartial, interdisciplinary and science-based process to identify potential environmental impacts and evaluate alternative management approaches. We will continue to work with the USFS to improve compliance with this important law.

⌘ **Advocacy for science-based management.** We have developed a detailed proposal for public lands livestock management. The proposal uses scientifically tested forage consumption limits, seasons of use, streambank impact limits and other established measures as starting points for sustainable livestock management. The proposal then mandates scheduled monitoring

of ecosystem health. Monitoring results then determine the amount and timing of grazing that will be allowed. The proposal uses adaptive management to ensure that grazing management is progressively adjusted until resources are in healthy condition and management is sustainable. Principles from our proposal have already been incorporated into several small and large scale grazing management plans, most recently the Sierra Nevada Framework.



Fritillaria striata  
(Striped Adobe Lily)

illustration by Linda Vorobik  
© Linda Vorobik



## Project Introduction

**L**ivestock grazing affects more of California's 20 million acres of National Forest land than any other land use activity. Grazing occurs in grasslands, wetlands, riverbeds, ephemeral springs, meadows, savannahs and forests from sea level to 10,000 feet. Cows, horses and sheep forage many sensitive lands including Congressionally designated Wilderness, popular recreation areas, fragile high-mountain meadows, and habitat for rare species. Improperly managed livestock can damage stream channels, facilitate weed invasion, alter natural fire regimes, and degrade habitat for birds, fish and other rare and common wildlife.

CNPS and CalTrout have long been leading advocates for science-based, conservative, resource-friendly livestock management because of the impacts of poorly managed grazing on native vegetation, fish and wildlife. We have approached this issue, as we approach most land-use and management problems. That is we promote: 1) livestock management methods that have been scientifically shown to protect natural resources, including closure to livestock when necessary, 2) scientifically sound monitoring, 3) scientific analysis, and 4) full public disclosure of the environmental impacts of livestock management. Our hypothesis is that if the public and decisionmakers are provided with high-quality scientific data and analyses, well-reasoned, legally sound decisions will be made, leading to better use and management of public resources.

Accordingly, working with many other groups, most notably Natural Resources Defense Council (NRDC) and the Central

Sierra Environmental Resource Center, CalTrout and CNPS initiated a coordinated project to comprehensively evaluate and improve USFS monitoring and management of livestock and consequently reduce grazing impacts on National Forest lands. This report presents preliminary results from the first two years of that project.

The project proposed the following four-point strategy to improve grazing management:

- ⌘ *Advocacy to increase monitoring of and transparency in grazing management*
- ⌘ *Field visits to check conditions on the ground and bring attention to problem areas*
- ⌘ *Advocacy for legally required scientific analysis and disclosure of grazing management programs and their environmental impacts under the National Environmental Policy Act*
- ⌘ *Advocacy for scientifically sound and conservative adaptive management programs for grazing on National Forest lands*



# Sunshine Project

*Efforts to Improve Public Access to Information Regarding USFS Monitoring and Enforcement of Grazing Policies*

**W**e worked to persuade the USFS to 1) update internal information collection systems and 2) increase public disclosure of grazing monitoring data. We have achieved notable success evidenced by the following:

⌘ *Each year the USFS now collects, summarizes and makes available to the public annual use data for all allotments on all California National Forests. This program began with the 1998 field season. (We have persuaded the BLM to launch a similar program. It began in 1999).*

⌘ *Each year the USFS also provides summaries of (1) allotments on which annual use or streambank disturbance limits have been violated and (2) what, if any, formal administrative actions were taken to address problems.*

⌘ *Over 350 new ecosystem health study plots have been installed on California National Forests. These are used to monitor long term changes in plant community health and composition. Each year, the USFS provides monitoring results and other information from these plots to the public on compact discs (see below).*

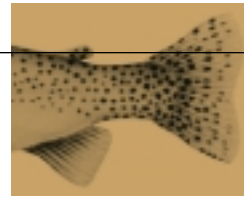
⌘ *All monitoring data is now available to the public by contacting the USFS Pacific Southwest Region Range Program in Vallejo, California.*

As monitoring reports have been compiled and published, the number of allotments monitored has increased dramatically. The USFS reported that overall it monitored only approximately 71% of its active grazing allotments statewide in 1998. Although great variability persists among Forests, this percentage jumped to about 86% by the 2000 field season (see **Table I**, page 5).

The agency's monitoring capacity has also been improved by our successful lobbying of Congress. In collaboration with a multi-lateral working group including California Cattlemen's Association, the California Farm Bureau and environmental groups, we have obtained almost \$1 million in additional monitoring funding for the California Range Program for the 2000 and 2001 field seasons. Another important factor has been the leadership of USFS California Range Program regional staff, who has been staunchly committed to implementing Forest Plans and environmental laws.

Intensified monitoring has affected grazing management on the ground. When violations of grazing rules are detected, USFS works with ranchers to document violations and change management where needed. Forest Service efforts to identify and solve grazing management problems have improved greatly in the past two years (see **Table 2**, page 6, for summary of administrative actions taken in 2000 field season). Although we have only anecdotal data on the number of administrative actions in





## Sunshine Project (continued)

past years, the year 2000 appears to represent a substantial increase in enforcement of grazing permit requirements.

However, more work is needed. Too many allotments are still monitored by cursory visual inspection, rather than by quantitative measurement of forage use or riparian

species composition or cover. In many cases, only a tiny percentage of an allotment is checked at all. The Forest Service has committed to improving the quality and quantity of monitoring and we will continue to work with them to make sure this occurs.

**Table I**

### USFS Livestock Use Monitoring in California

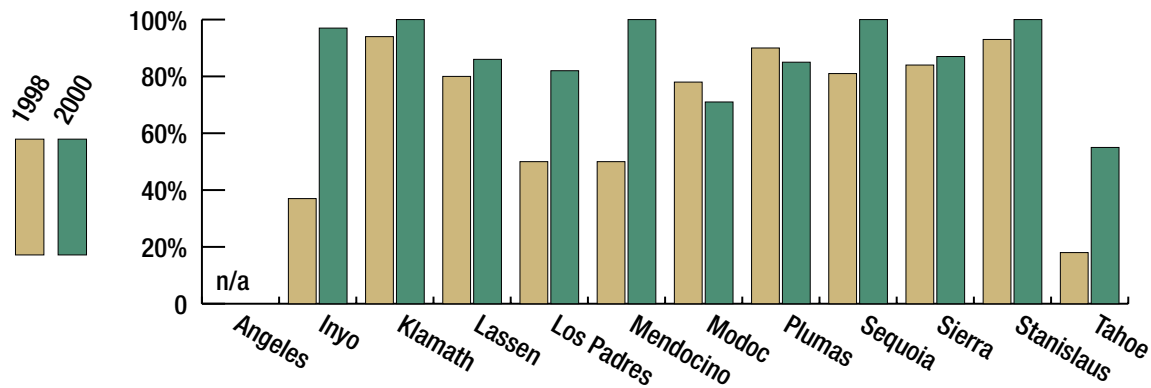
## Number of Allotments Grazed and Monitored 1998 versus 2000

Nat'l Forest	1 9 9 8			2 0 0 0		
	Grazed	Monitored	% Monit'd	Grazed	Monitored	% Monit'd
Angeles	**	**	**%	**	**	**%
Inyo	41	15	37%	36	35	97%
Klamath	49	46	94%	44	44	100%
Lassen	54	43	80%	50	43	86%
Los Padres	78	39	50%	65	53	82%
Mendocino	14	7	50%	8	8	100%
Modoc	77	60	78%	72	51	71%
Plumas	48	46	96%	39	33	85%
Sequoia	52	42	81%	52	52	100%
Sierra	32	27	84%	23	20	87%
Stanislaus	29	27	93%	29	29	100%
Tahoe	33	6	18%	29	16	55%
<b>Total</b>	<b>507</b>	<b>358</b>	<b>71%</b>	<b>447</b>	<b>386</b>	<b>86%</b>

\*\*no data available

**Table 1 – Graphic Representation**

**Percentage of Grazed Allotments Monitored  
1998 versus 2000**

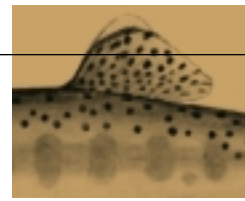


**Table 2**

**USFS Response to Grazing Permit Violations**

**Actions Taken  
year 2000**

Nat'l Forest	2 0 0 0				Total Actions Taken
	Show Cause/ Warning Letters	Permit Cancellations	Permit Suspensions	Adjustments/ Early Livestock Removal	
Inyo	1	2	0	16	19
Klamath	13	0	0	2	15
Lassen	7	0	0	5	12
Los Padres	3	0	1	0	4
Mendocino	2	0	0	0	2
Modoc	12	0	0	25	37
Plumas	15	0	0	0	15
San Bernadino	0	1	0	1	2
Sequoia	1	0	0	5	6
Sierra	1	0	0	10	11
Stanislaus	5	1	0	8	14
Tahoe	1	0	0	1	2
<b>Total</b>	<b>61</b>	<b>4</b>	<b>1</b>	<b>73</b>	<b>139</b>



## Field Investigation *of Forest Plan Implementation in Selected Areas*

**W**e selected 4–5 focal grazing allotments on three National Forests: Sequoia, Plumas, and Stanislaus. We focused on National Forests and allotments with (1) resources of special concern such as rare species or wilderness areas and (2) known histories of resource damage and/or poor grazing administration.

We used the Freedom of Information Act (FOIA) to request detailed information on the Forests' records of implementing Forest Plan requirements for management and monitoring of rare species, riparian ecosystems, native vegetation, and other ecosystem components. Forest Plans often contain detailed, laudable plans for monitoring and protecting ecosystem health, but implementation is frequently a low priority.

The FOIA request asked the following questions regarding the focal allotments:

- ⌘ *What ecosystem health monitoring is being done? How often?*
- ⌘ *When was the last comprehensive assessment of the health of each focal allotment?*
- ⌘ *How recent was the last NEPA analysis for each focal allotment?*
- ⌘ *What water quality data has been collected on each focal allotment?*
- ⌘ *Does water quality meet applicable Regional Basin Plan standards?*
- ⌘ *What rare plants occur on each focal allotment?*
- ⌘ *What is their status and trend?*

⌘ *How often are they monitored?*

⌘ *What is the status and trend of rare fish and other wildlife on and around the focal allotments?*

⌘ *What is the status and trend of native vegetation on the focal allotments?*

We also sent a team of range management specialists into the field to perform spot checks of annual livestock use, standard and guideline implementation and ecosystem health. These specialists performed measurements and took photographs to document rangeland condition. On the Plumas National Forest (NF), the Forest Supervisor and ranchers accompanied us on an inspection of some of the most damaged areas, leading to commitments from both the agency and permittees to improve conditions.

Preliminary analysis of data obtained through the FOIA request reveals a mixed USFS record in monitoring the condition and trend of species and ecosystems within grazing allotments. For example, the ecological condition of many grazed Sequoia NF meadows has not been evaluated for decades. Several actively grazed allotments on the Stanislaus NF have never been surveyed for rare plants that may be sensitive to livestock impacts. On the Plumas NF, management has been so poor that three range conservationists and several other resource specialists have quit in the last five years, leading to gaps and inconsistencies in allotment management records.

The field investigations detected problems with ecosystem health. We documented



overgrazing of both herbaceous and woody species, particularly in riparian areas. Streambank damage, excessive use of oaks and willows, and large areas of bare soil were observed on most

focal allotments. On the Plumas NF, for example, we observed repeated examples of eroding streambanks stripped of vegetation, downcut stream channels and dewatered meadows in which sagebrush, grasses and other upland species had replaced the sedges and wetland communities that had once occupied the sites. On the Sequoia NF, we observed repeated examples of



*Oncorhynchus clarki seleniris* (Paiute Cutthroat Trout)  
 illustration by Joseph Tomelleri  
 © Joseph Tomelleri

excessive browsing and hedging of oaks, *Arctostaphylos*, *Ceanothus*, and other woody, “non-forage,” species (see **Exhibits I-4**, on pages 9–10, for views of focal allot-

ments). Over-utilization of herbaceous vegetation and widespread hoof punctures in delicate meadows were also common. On the Stanislaus NF, meadow and streambank damage and excessive forage use were again documented by the field teams. The results of these field visits are being used to highlight areas for USFS action.

## Focal Allotments

### Stanislaus NF

#### Highland Lakes including:

- ⌘ Tyron Meadow
- ⌘ Bloomfield Meadow
- ⌘ Gardner Meadows Trailhead
- ⌘ Highland Lakes
- ⌘ Upper Gardner Meadow
- ⌘ Arnot Meadow
- ⌘ Half Moon Lake
- ⌘ Lower Gardner Meadow

#### Clavey including:

- ⌘ Fahey Cabin

### Sequoia NF

#### White Deer/Kings River

#### Dunlop including:

- ⌘ Annual grassland in uplands areas
- ⌘ Annual grassland in riparian areas
- ⌘ Higher elevations wet meadows and seeps

### Plumas NF

#### Chase

#### Grizzly

#### Frenchman

#### Jenkins

## Field Investigation Exhibits 1-4



1



Fenceline,  
oak savannah,  
Sequoia National  
Forest.  
8/2000

2



Heavy forage use  
on steep slopes,  
hedging of  
Arctostaphylos,  
Sequoia National  
Forest.  
8/2000

9



3



Hoof shear in mountain meadow, Sequoia National Forest. 9/2000

4



Overuse of riparian area, cut banks, de-watered meadow, potential non-point pollution, Plumas National Forest. 9/2000

# NEPA Status Review



**T**he National Environmental Policy Act (NEPA) requires that the environmental effects and consequences of all Federal actions which may significantly impact the environment be analyzed and disclosed to the public. One such action is authorization of livestock grazing on Federal lands, including National Forests. However, historically livestock grazing permits have rarely been subjected to NEPA analysis.

NEPA analysis is essential to proper land management. It mandates an impartial, interdisciplinary and science-based process to identify potential environmental impacts and evaluate alternative management approaches. NEPA sets high standards for the amount and quality of scientific information and analysis that must be publicly disclosed. It also requires that areas be evaluated for their suitability for use by livestock.

In 1994, after successful lawsuits by CNPS, CalTrout and others to enforce NEPA requirements for USFS grazing, Congress directed all National Forests to establish and “adhere to” a schedule to bring all grazing allotments into compliance with NEPA (1994 Rescission Act, PL 104-19, Sec. 504). USFS chose a 15-year period for its schedule, starting in 1995.

In October of 2000 CNPS, California Trout, and the Natural Resources Defense Council sent a letter to Regional Forester Brad Powell requesting an update on com-

pliance with the Rescission Act schedule for all allotments in the USFS Pacific Southwest Region (California). The data are displayed in **Table 3** on the opposing page. As expected, the vast majority of grazing permits in California do not have current NEPA analyses and the Region is far behind in its obligations to perform NEPA analyses under the Rescission Act schedule.

The Sequoia NF has the worst record. None (0) of the Sequoia’s 59 allotments has a current management plan or NEPA analysis.



*Oncorhynchus clarki henshawi* (Lahontan Cutthroat Trout)  
illustration by Joseph Tomelleri  
© Joseph Tomelleri

Attorneys from the Natural Heritage

Institute, Earthjustice Legal Defense Fund, Natural Resources Defense Council concur that it is likely that the Rescission Act schedule is legally enforceable. The California Attorney General’s office is also investigating this question. Meanwhile, the Forest Service has told us that they have insufficient resources and therefore no intention of meeting their Rescission Act NEPA schedule in the foreseeable future.

The 2001 Sierra Nevada Framework, covering 11 National Forests and more than 10 million acres, relies heavily on evaluations of ecological condition to set the timing and levels of livestock use in Sierran National Forests. Where livestock are found to be damaging ecosystems, grazing management will be altered or livestock will be excluded. If the USFS begins to meet its NEPA obligations, it will identify damaged areas and must alter grazing management in those areas under Framework



rules. The longer NEPA is delayed, the longer needed changes in management will be postponed. NEPA will also help USFS to identify areas and grazing management programs that are compatible with resource protection so that they can be replicated elsewhere.

The four Southern California National Forests, the Angeles, Cleveland, Los Padres, and San Bernardino, are embarking on revisions of their Land Management

Plans beginning this June. These revisions are likely to produce requirements for ecosystem health-based changes to grazing management similar to those in the Sierra Framework.

We are considering several measures, including litigation, to enforce the Rescission Act NEPA schedule so that ecological analyses will be performed and needed adjustments to grazing management can occur.

**Table 3**

### NEPA Analyses on California National Forests Required versus Completed Analyses

JANUARY 2001				
Nat'l Forest	Active Allotments 1996	Decisions Due By 2001 Under Rescission Sched.	Allotments with Current Analyses 1/1/01	% Rescission Schedule Complete 1/1/01
Angeles	9	6	0	0%
Cleveland	19	10	5	50%
Eldorado	17	9	3	33%
Inyo	40	25	17	68%
Klamath	74	44	14	32%
Lassen	58	46	14	30%
Los Padres	78	49	11	22%
Mendocino	18	10	3	30%
Modoc	146	63	40	63%
Six Rivers	18	9	1	11%
Plumas	40	40	18	45%
San Bernardino	7	4	1	25%
Sequoia	59	36	0	0%
Shasta-Trinity	24	18	0	0%
Sierra	32	28	7	25%
Stanislaus	36	13	5	38%
Tahoe	41	18	4	22%
Lake Tahoe Basin MU	6	4	0	0%
<b>Total</b>	<b>722</b>	<b>432</b>	<b>143</b>	<b>33%</b>

# Advocacy for Science-Based Adaptive Management *of Livestock on National Forests*



**W**e have developed a detailed proposal for public lands livestock management based on monitoring and iterative adjustment of management based on monitoring data. This proposal is based on the idea that grazing systems should be determined by the health of the ecosystem.

We used the scientific literature to identify examples of scientifically tested management measures that have been shown to ensure resource protection. We suggested measures including herbaceous plant consumption limits for various plant communities, season of use, allowed streambank damage, and limits on impacts to woody species such as oaks and willows. The management proposal also requires rigorous evaluation of current condition, grazing suitability analysis, and increased quality and quantity of monitoring. The proposal then sets mandatory schedules for monitoring of ecosystem health. Monitoring results then set the amount of grazing that is allowed and the season during which grazing may occur. If ecosystem health is found to be deteriorating, grazing management (utilization limits, season of use) must be adjusted before the following season. If ecosystem health is found to be improving, livestock operators may apply for an increase in forage allocation or change in season of use. This approach is designed to use adaptive management to ensure that grazing management is progressively adjusted until resources are in healthy condition and grazing management is sustainable. In sensitive areas, this may lead to the elimination of grazing.

Many groups have used this proposal in

advocacy for sustainable grazing management on National Forests, Bureau of Land Management Lands and lands managed by the Bureau of Reclamation and other agencies in California and adjacent states. Principles from the proposal have been incorporated into both small and large scale grazing management plans, most recently the Sierra Nevada Framework.

The proposal is available from the CNPS office or on the CNPS web site: [http://www.cnps.org/archives/letters/grazing\\_proposal.pdf](http://www.cnps.org/archives/letters/grazing_proposal.pdf)



Darlingtonia californica (California Pitcher Plant)  
illustration by Linda Vorobik  
© Linda Vorobik



## Next Steps

**T**hrough years of effort, we have achieved significant increases in the quality and quantity of livestock monitoring on California National Forests and in public access to information on livestock impacts and ecosystem health in grazed areas. But much work remains to 1) restore the health of damaged public rangelands, 2) make public lands grazing management compatible with native ecosystem conservation and 3) bring management programs into compliance with environmental laws.

*First*, we must maintain and build on the progress we have made in livestock monitoring and public access to information. We must work with the USFS to increase the acres and allotments that are monitored and to promote quantitative, repeatable monitoring methods.

*Second*, we must take steps to bring the USFS Range Program into compliance with NEPA and the Rescission Act.

*Third*, we will continue to work with Congress and with Agency decisionmakers to provide adequate funding and staffing for the Range Program and related programs such as botany and noxious weeds.

*Fourth*, we will continue our program of field visits and dialogue with ranchers and

Forest Service staff about problem areas and alternative management approaches.

*Finally*, the Sierra Nevada Framework provided updated, improved management direction for the grazing program. The upcoming Southern California Forest Plan Revision should do the same. CNPS and other scientific and advocacy groups must closely monitor agency policies and actions to ensure that the new direction is properly implemented. This will involve more documentation of on-the-ground conditions through measurement and photographs, and careful review of projects and policies.

We are concerned that the progress we have achieved will slow or stop under the Bush Administration. We may be forced to resort to litigation or to more confrontational advocacy tactics in the future.

CNPS, CalTrout and other groups will carefully monitor Sierra Nevada National Forest grazing programs this summer, the first field season of management under the Framework. By the fall of 2001, we expect to have a preliminary idea of how (or whether) the new Administration intends to implement the Sierra Framework and how they plan to manage public lands with regard to grazing practices. At that time, we will re-evaluate our strategy and examine new opportunities for action.

*“Harmony with land is like  
harmony with a friend;  
you cannot cherish his right hand  
and chop off his left.  
You cannot conserve the waters  
and waste the ranges...  
The land is one organism.  
Its parts, like our own parts,  
compete with each other and  
co-operate with each other.”*

Aldo Leopold, 1948





