

# California Native Plant Society

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August 25, 1999

Bruce Emmens  
District Ranger  
Monterey Ranger District  
406 South Mildred  
King City, CA 93930

Re: Coastal Range Allotment Scoping

Dear Mr. Emmens:

The following are the comments of the California Native Plant Society (CNPS) on the scoping request for the 8 grazing allotments on the Big Sur Coast. The CNPS is a non profit organization of more than 10,000 laypersons and professional botanists. The mission of the California Native Plant Society is to increase the understanding and appreciation of California's native plants and to preserve them in their natural habitat through scientific activities, education, and conservation. Our members and chapters work closely with the U.S. Forest Service and other State and Federal agencies to manage and conserve rare and common botanical resources in California. Our members also use the Monterey Ranger District extensively for research, education and recreation.

The CNPS appreciates this opportunity to give input into this important environmental analysis. We also commend the USFS for grouping these allotments under one analysis. Grouping streamlines the process for both the public and the agency and allows ecologically similar areas to be addressed more efficiently. We would like to continue to receive information about this project.

## General Questions

Because this analysis covers such a large area and will have wide ranging impacts over the next decade or more, the analysis should be intensive. In order for us – and for Forest Service decisionmakers - to fully understand the proposed project and its potential impacts, we request that the NEPA analysis for the project include answers to the following questions:

1. Which rare plants (State or Federally listed, Forest Service-designated sensitive or watchlist plant species) may live in the project areas?
2. How much potential habitat for rare plants exists in the project area?
3. How much (percentage) of the potential rare plant habitat has been surveyed by a qualified botanist? When were the surveys performed (month, year)? Who performed them? (CNPS may contact the botanist to request additional site specific information on surveys or findings.)
4. What impacts will the alternatives have on rare plants in the project area?

5. What is the status and trend of infestation by noxious weeds or other non-native weeds in the project areas?
6. What impacts will the alternatives have on weed status and trend in the project area?
7. What proportion of the riparian areas in the project area have been assessed using the interagency riparian proper functioning condition methodology or other methods? What was their condition and trend?
8. What water quality data is available for the project area and what are the requirements for water quality in the area?
9. What impacts will the alternatives have on riparian ecosystems and water quality?
10. What reference areas or information on reference conditions are available for comparison with grazed areas on the allotments?
11. What are the conditions and trends of plant communities on the allotments and what methods were used to determine them?
12. What were the allowed and measured utilization levels on the allotments for the past 5 years?
13. What were the allowed and measured riparian disturbance levels on the allotments for the past 5 years?
14. What are the primary water sources for livestock? Are these adequately distributed on the allotments to prevent excessive congregation and stream or soil damage?
15. What projects on the Forest watershed improvement needs inventory are in the allotments? What is the schedule for addressing these projects?
16. What impacts will the alternatives have on diversity (species, age class, seral stage) in the project area? (See NFMA 36 CFR § 219.26)
17. What proposed or established Research Natural Areas or Botanical Special Interest Areas are present in the project area? How will the alternatives affect these resources?
18. What is the condition of the soils in the project area (are there problems with compaction, bare soil, infiltration)?
19. Are livestock interfering in any way with any other uses of the project area such as recreation, scenic values, clean water production, rare species habitat?

#### Forest Service Manual Direction

We support the excellent guidance in the Forest Service Manual regarding management planning for livestock grazing (FSM § 2200) and for weed management (FSM § 2080). In particular, we look forward to the following components of this NEPA analysis:

- ◆ Quantitative utilization limits based on plant community, and ecological condition (FSM § 2211.6(1))
- ◆ Quantitative description of the desired condition (FSM § 2211.3 (1))
- ◆ Quantitative standards and guidelines following the direction of FSM § 2211.6:
 

*“Standards and guidelines for rangelands must be quantifiable, have timeframes, and be based on ecologically defined units. They must address the current vegetation and other rangeland resource situations and indicate the management strategies that will be utilized to move vegetation and other resources toward desired future condition.”*

- ◆ Information on coordination requirements for sensitive species management (FSM § 2211.6(5))
- ◆ Disturbance limits for streambanks (FSM § 2211.6(6))
- ◆ Resource inventory containing the minimum information required by FSM § 2212.11 and by the National Forest Management Act (NFMA, 36 CFR § 219.12 (d))
- ◆ Monitoring and evaluation plans with adaptive management proposals (FSM § 2212.2 (4))
- ◆ Weed risk assessment
- ◆ Weed mitigation proposal

Regarding weeds, we also draw your attention to President Clinton's February 3, 1999 Executive Order addressing weed management by Federal agencies (enclosed). It presents additional excellent mandates for the management and reduction of weed spread in Federal actions.

#### Suitability and Capability

We also request that the environmental document contain a suitability and capability analysis for these allotments.

The NFMA defines "suitability" and "capability" as:

*"Suitability. The appropriateness of applying certain resource management practices to a particular area of land as determined by an analysis of the economic and environmental consequences and alternatives uses foregone. ..."*

*"Capability. The potential of an area of land to produce resources, supply goods and services, and allow resource uses under an assumed set of management practices and at a given level of management intensity. Capability depends upon current conditions and site conditions such as climate, slope, landform, soils, and geology, as well as the application of management practices, such as silviculture or protection from fire, insects, and disease."*

Suitability is often thought of as "should" the land be used in a certain manner while capability asks the question, "can" the land be used in a certain manner.

The NFMA also provides direction for determination of grazing suitability and capability:

*"219.20 Grazing resource.*

*In forest planning, the suitability and Potential capability of National Forest System lands for producing forage for grazing animals and for providing habitat for management indicator species shall be determined as provided in paragraphs (a) and (b) of this section.*

*Lands so identified shall be managed in accordance with direction established in forest plans.*

*(a) Lands suitable for grazing and browsing shall be identified and their condition and trend shall be determined. The Present and potential supply of forage for livestock, wild and free-roaming horses and burros, and the capability of these lands to produce suitable food and cover for selected wildlife species shall be estimated. The use of forage by grazing and browsing animals will be estimated. Lands in less than satisfactory condition shall be identified and appropriate action planned for their restoration.*

*(b) Alternative range management prescriptions shall consider grazing systems and the facilities necessary to implement them; land treatment and vegetation manipulation practices; and evaluation of pest problems; possible conflict or beneficial interactions among livestock, wild free-roaming horses and burros and wild animal populations, and methods of regulating these; direction for rehabilitation of ranges in unsatisfactory condition; and comparative cost efficiency of the prescriptions.”*

More specifically, USFS Washington Office has provided direction regarding evaluation of grazing suitability and capability (see WO Capability and Suitability Direction, April 25, 1997). USFS Region 4 has also developed useful methods for this task. Issues to be assessed in the analysis include:

- ◆ The presence or absence of social conflicts, developed recreation sites, and special use sites that may conflict with livestock
- ◆ Presence/absence of administrative sites and research facilities or study sites
- ◆ Practicality – or impracticality - of livestock grazing due to economic considerations, either from an agency or from a permittee standpoint
- ◆ Presence/absence of key plant or wildlife habitat areas (special interest areas, research natural areas, threatened, endangered, sensitive and management indicator species habitat) that may be impacted by livestock
- ◆ Presence/absence of steep slopes or soils with erosion hazard ratings of moderate or greater
- ◆ Presence/absence of weed infestations where livestock use could impede weed control objectives
- ◆ Presence/absence of unique habitats such as bogs, fens, jurisdictional wetlands, or rare plant communities
- ◆ Areas where the existing condition or rehabilitation needs preclude grazing for the planned period (emphasis added)

### Cost-Benefit Analysis

A cost-benefit analysis for livestock production on these allotments should be included in this NEPA analysis, either as a part of the suitability analysis or separately. The analysis should include answers to the following questions:

- ◆ How much revenue does the Federal government receive from livestock grazing on these allotments each year?
- ◆ How much money has been spent over the last 10 years to rehabilitate damage directly attributed to livestock production?
- ◆ What is the annual cost for management of the allotments (monitoring, permit administration, surveys, etc)?
- ◆ What is the annual cost for maintenance of all fencing in the area?
- ◆ What is the number of annual Recreational Visitors to the Area?
- ◆ What is the value to the local economy from recreation, fishing, hunting, and back country stock use?
- ◆ How much does the livestock production on the allotments contribute to the local economy?

### Interdisciplinary Approach

We urge you to assemble a broad interdisciplinary team, including a botanist, ecologist, range management specialist, aquatic ecosystem specialist, and others to develop this important analysis. Interdisciplinary planning is at the heart of the NFMA mandate, and is required throughout the law (see e.g. 36 CFR §219.1 (b)(10); §219.5, §219.12, etc.).

Specifically, 36 CFR §219.5 (b) requires

*“In appointing [interdisciplinary] team members, the responsible line officer shall determine and consider the qualifications of each team member on the basis of the complexity of the issues and concerns to be addressed through the plan. The team shall collectively represent diverse specialized areas of professional and technical knowledge applicable to the planning area, and the team members shall have recognized relevant expertise and experience in professional, investigative, scientific, or other responsible work in specialty areas which they collectively represent. The team may consist of whatever combination of Forest Service staff and other Federal government personnel is necessary to achieve an interdisciplinary approach. The team is encouraged to consult other persons when required specialized knowledge does not exist within the team itself. “*

Both the letter and spirit of the NFMA’s direction should be embraced in this analysis. We urge the Forest to incorporate specific strategies for ongoing interdisciplinary management of the allotments into the management plan.

### Monitoring and Adaptive Management

Because it is impossible to predict the impacts of any management regime with certainty, continuous monitoring and adaptive management of these allotments is necessary to ensure that livestock impacts remain within acceptable limits. CNPS has

developed a detailed proposal for adaptive management of livestock grazing on National Forests (enclosed). Although it was developed for the Sierra Nevada, I hope you will find portions of it useful, particularly the sections addressing procedural issues such as NEPA analysis, accountability, adaptive management, and monitoring. The management plans for these allotments should include clear and scientifically sound monitoring and adaptive management components with specific timelines.

### Conclusion

Thank you for your attention to these concerns. We hope these comments are useful. Please contact me if there are questions. We look forward to continuing to participate in the planning process for this project.

Sincerely,

Emily B. Roberson, Ph.D.  
Senior Land Management Analyst

Encl. Weed Executive order  
CNPS Grazing management proposal

