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Attn: Associate Director for NEPA Oversight
NEPA Modernization (CE)
722 Jackson Place NW
Washington DC 20503

To Whom It May Concern:

{The following are supplemental comments specific to our concerns about the use of categorical exclusions in the management of livestock grazing on federal lands. These supplemental comments in no way should be interpreted as intending to supersede the substance of our primary comments that were submitted on behalf of our respective member organizations.}

We appreciate this opportunity to comment on the Council on Environmental Quality's (CEQ's) proposed Guidance on Categorical Exclusions (CEs). We also would like to take this opportunity to specifically address the current and potential use of CE's as they affect livestock grazing on our federal lands while offering recommendations that would benefit the management of our federal resources.

Livestock grazing on federal lands is the single largest use of federal lands. Ten federal agencies manage more than 22.6 million animal unit months (AUMs) annually on almost 250 million acres of federal lands. Two of these agencies, the U.S. Forest Service (USFS) and the Bureau of Land Management (BLM), are responsible for managing the vast majority of these affected public acres.

In order to properly manage the vast number of livestock that graze federal lands, the National Environmental Policy Act (NEPA) provides a regulatory framework which is indispensable towards achieving the proper management of these natural resources. Unfortunately, due to myriad reasons, thousands of individual grazing allotments managed by these two agencies have failed to undergo even the most basic of NEPA analyses. The lack of proper NEPA documentation and consideration of options for improved management at the allotment level is particularly troubling given that NEPA analysis is central to informing agency staff and the public during the process of making well informed decisions about how to manage