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December 14, 2018

Keith Lannom  
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Payette National Forest  
United States Forest Service  
500 N. Mission St.  
McCall, ID 83638

Submitted through <https://cara.ecosystem-management.org/Public//CommentInput?Project=54029>

**RE: Granite Meadows Project Scoping**

Dear Mr. Lannom,

The Idaho State Department of Agriculture (ISDA) is in receipt of your October 31, 2018 scoping letter for the Granite Meadows Project. ISDA is mandated to provide support, coordination and expertise to Idaho rangeland livestock producers, as well as land and wildlife management agencies for the planning and management of vegetation, grazing permits, and other rangeland resources that are of importance to the livestock industry. See Idaho Code § 22-103(23). Please take the following comments into consideration as you continue coordination and planning for this project.

ISDA appreciates the work that the Payette National Forest and the Payette Forest Coalition (PFC) have done to initiate the Granite Meadows Project. As wildfires continue to grow and have a devastating effect, it is important to be proactive in forest management. This project will work to create a resistant and resilient landscape to wildfire. It will also create many opportunities for multiple uses within the Payette National Forest.

ISDA appreciates the acknowledgement of grazing in the scoping document. It is important to identify that grazing occurs within the project area, as it can have a positive effect on the fuels reduction effort. Studies have shown that grazing reduces fine fuels. According to Svejcar et al. (2013):

*“Grazing is one of the few tools available to reduce the herbaceous vegetation that becomes fine fuel on rangelands, particularly at large spatial scales. This is especially true if invasive annual grasses are present (e.g. Diamond et al. 2012). Native bunchgrasses also can be more susceptible to fire mortality when they are not grazed because litter accumulates near their growing points; bunchgrass mortality opens the plant community to invasion by exotic annuals (Davies et al. 2009). These situations provide examples of the importance of maintaining grazing as a vegetation management tool.”*

The Payette National Forest has the ability to work within the current grazing permits in order to continue reducing fine fuels across the project area. This can especially be done in areas that are logged or treated with prescribed burning. As the canopy cover is reduced, more sunlight will reach the forest floor, therefore increasing the biomass of the herbaceous understory. Grazing can manage the herbaceous understory and reduce the amount of hazardous fuel on the forest floor.

The Payette National Forest has identified that an outcome of this project is to improve the local economy. Livestock grazing plays an integral part in the local economies of Idaho's rural communities. According to a 2014 study conducted in Owyhee County, Idaho by Lewin et al., one AUM creates an output of \$114.74 to the local economy. ISDA recommends that the Payette National Forest work with the authors of this article in order to determine how this can be applied to the local economies in this area.

ISDA encourages the Payette National Forest to have meaningful coordination with the grazing permittees within the Granite Meadows Project area. This coordination will be essential in the implementation of the project and will ensure that livestock grazing is not adversely affected by the project. It will also help to minimize conflicts with livestock management and the general public using the project area. We also recommend close collaboration with the State of Idaho throughout the planning and implementation of this project.

ISDA appreciates the opportunity to provide scoping comments to the Payette National Forest in regards to the Granite Meadows Project. We request to be involved in conversations between the USFS and grazing permittees within the project area. Please don't hesitate to contact me any time with questions concerning these comments or livestock management on the Payette National Forest.

Sincerely,



Brooke Jacobson  
Range Program Manager  
Idaho State Department of Agriculture

**References:**

Lewin, Paul A., et al. "Regional Economic Impact Model of Owyhee County." Agricultural Economics Extension, ser. 14-01, June 2014. 14-01.

Svejcar, T., Boyd, C., et al. (2014) Western land managers will need all available tools for adapting to climate change, including grazing: A critique of Beschta et al. Environmental Management, 1-4. doi:10.1007/s00267-013-0218-2