



April 16, 2020

Zach Peterson, Forest Planner  
Nez Perce-Clearwater National Forests Supervisor's Office  
903 3rd Street  
Kamiah, ID 83536  
Submitted via email to: [sm.fs.fpr\\_npclw@usda.gov](mailto:sm.fs.fpr_npclw@usda.gov)

**RE: Nez Perce-Clearwater National Forest Plan Revision Draft Environmental Impact Statement**

To Whom It May Concern:

The Idaho Cattle Association (ICA) submits the following comments regarding the Nez Perce-Clearwater National Forest Plan Revision Draft Environmental Impact Statement (DEIS) on behalf of the ranchers who have permits to graze livestock within the Nez Perce-Clearwater National Forest and whose livelihoods are dependent upon the ability to continue grazing on public lands.

Beyond our dependency on use of the public lands to sustain our industry and our members' livestock operations, we, along with our members and employees, rely upon the public lands within the Nez Perce-Clearwater National Forest area to maintain the custom and culture of public land livestock grazing, to recreate, and to otherwise enjoy the open space and quality of life that the public lands and associated private and state lands provide us, as well as our members and employees.

**General Comments**

In general, continued grazing use of public lands is critical to the continued functioning of the livestock industry in Idaho and across the west. Concurrently, livestock grazing can provide great benefit to the landscape on which it is applied and to the surrounding communities.

The Forest Service is mandated, through the Federal Land Policy and Management Act (FLPMA), to manage the land for multiple use and sustained yield, protect valid existing rights, and consider the needs of the adjacent communities. Livestock grazing is a vital component of both multiple use and sound land management. Thus, the forest plan should be more complete in acknowledging its value. Rather than approaching the management of the allotments contained within the Nez Perce Clearwater Forest from the erroneous assumption that livestock grazing has negative effects on the landscape, the Forest Service should instead be considering ways in which it may more efficiently manage grazing in cooperation with the permittees to maximize available AUMs, which can be done effectively



in harmony with other landscape values, and can particularly provide fuels reduction benefits—which are so necessary across this landscape. Below are more detailed comments on how this can be accomplished.

### **Value of Grazing**

The forest plan should facilitate continued livestock grazing use across the landscape within the Nez-Perce Clearwater National Forest. Livestock grazing provides many benefits. Ranchers are the stewards of the ecosystem on both the private and public land they use. They provide an effective line of defense against fire and noxious weeds, manage forage for optimum production, and are the primary protectors of open space in the private lands of the west. Without the presence of livestock grazing, and the permittees who own and manage the livestock, large areas of wildlife habitat would be in jeopardy. The benefits provided by ranching relate directly to several identified concerns including wildfire, invasive plants, and urbanization and development.

### **Fuels Management**

Livestock grazing can be an effective tool in managing the threat of catastrophic wildfires. It is documented that any reduction in grazing intensity, such as a reduction in the utilization level or total AUMs to be utilized in an area, will cause a relative increase in the fine fuel load. This increases the risk of fire ignition and the likelihood that a fire will burn with greater intensity, cause more damage, and encompass larger areas. The forest plan should acknowledge the benefit of continued livestock grazing to fuels reduction. The plan should provide methods for incorporating the use of grazing as a tool for fuels management.

### **Flexibility**

A forest plan should be a guidance document that promotes sound management but enables on-the-ground decisions to be made at the local level and not pre-determined on a broad basis. The DEIS lists the current amount of AUMs within the Forest. We encourage the incorporation of language that states that AUM levels are determined based on rangeland production values and can increase as needed. The forest plan should not have an upper limit but should allow the AUM level to be modified over time based on site-specific conditions.

### **Stubble Height Requirements**

It is not appropriate at this level for the Forest Service to dictate specific management tools such as stubble height requirements. Those decisions should be left to the land managers at the local level where determinations about impacts and the appropriate prescriptions can be made at the localized, site-specific level. The six-inch stubble height requirement in riparian areas is particularly concerning. While various studies have identified varying ranges of stubble height to meet specific objectives in specific riparian areas, there is no peer-reviewed or accepted research that a six-inch stubble height is required to manage for healthy stream banks across the forest. Appropriate stubble height varies by plant species and herbaceous species may not be present on all stream reaches due to site potential. The forest must also include clarification that “end of season” stubble height should be monitored at the end of the growing season and be based on site potential. It is imperative that this guideline is removed and that stubble height requirements are managed at the site-specific scale based on management objectives and site potential.



### **Grazing Restrictions in Fish Habitat**

The DEIS requires the implementation of measures to be included in grazing annual operating instructions. This broad guideline must be removed. The Forest Service is not required to apply measures for all native fish, therefore making this guideline arbitrary and unwarranted. This would have a significant and unwarranted impact on grazing permittees within the forest. Any measures implemented should only be initiated through the required Section 7 ESA consultation during the authorization or reauthorization of grazing permits. If concerns regarding ESA fish species arise in Section 7 consultation, guidelines for ESA fish species should be implemented at that time and on the site-specific scale.

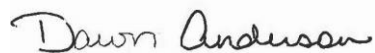
### **Socio-Economic Impacts**

The Forest Service must consider not only the environmental consequences in their analysis, but also the impacts to the human environment and economy, including grazing. If grazing permits are reduced, the negative economic impact to the surrounding area would be significant and it is important that the final EIS acknowledge this. The limited socio-economic review in the DEIS entirely fails to adequately consider the value of a ranch to the local economy and the trickledown effect that a lost AUM causes to an entire rural community. In Idaho, where well over half of the land is federally-owned, countless rural communities rely on public lands grazing for their tax base, commerce, and jobs. Few other industries in western rural communities are as stabilizing and longstanding. Ranchers provide seasonal and year-round jobs, bring steady, reliable business to local supply stores and other services, and provide a tax base for rural communities that have little other economic activity. In a study of one western rural community, for example, a 25% reduction in federal grazing led to a 7.3% decrease in sales and a 6.4% loss of jobs.

### **Conclusion**

Thank you for providing the opportunity to comment on this DEIS. We hope that you will be able to incorporate and address our concerns prior to the document being final. Please do not hesitate to contact us if you need further information or have questions about these issues.

Sincerely,



Dawn Anderson, President  
Idaho Cattle Association

