

April 14, 2021

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Subject: Comments on Forest Service Proposed Rangeland Management Directives

Thank you for the opportunity to provide comments on the Forest Service Proposed Rangeland Management Directives. I am a native of Idaho and have spent most of my life near and on National Forest lands. I value our forest lands and continue to want to see them properly managed. The proposed updates are positive but can be further strengthened in some areas. The following comments are provided to assist in this process.

Proper land management must be an active, not passive activity. The passive management we have seen over the past forty plus years is exactly why our national forest lands are in such poor health and currently represent a huge fire risk. I have never had a grazing permit on federal land and do not ever intend to pursue one. However, I believe grazing of our federal lands is necessary and extremely important to forest and rangeland health, fuel load management, providing food and fiber for the citizens of our nation, providing jobs both directly and indirectly related to the industry locally and nationally, sustaining local rural communities and economies, and maintaining the viability of ranches and farms, both those with federal grazing rights as well as their neighbors with strictly private land operations. The viability of these farms and ranches is what keeps this private property as productive agricultural land rather than housing developments. Additionally, if you compare the ecological and overall health of the average ranch to that of the majority of our federal lands that aren't being actively managed, you will see that the private lands are much healthier and sustain healthy populations of plants and wildlife and watershed function.

The Rangeland Management Directives must use modern science, and must address the role of grazing in achieving fuel load management and Forest and Watershed health objectives. With the now annual mega-wildfires the western United States has been experiencing must come an unbiased and cooperative effort to reduce this threat. We must use modern science and all of the tools available, and grazing must be an important part of the long-term solution. More fire-fighting resources will not solve

the problem, in addition to being cost prohibitive. The focus must be on fuel load reduction and fuel management in order to control the fire intensity and continuity. Modern research by several universities (including UC Berkeley) exists and should be used as a basis for grazing management and fire risk reduction strategies. Grazing as well as timber management are two very important tools needed to accomplish this fuel load management need. While prescribed fire has a role, it cannot (and should not) be used frequently enough to adequately control the fuel loads because that burn frequency causes significant and often permanent impacts to flora and fauna. Prescribed fire also is not appropriate to use in areas where stands of species like the whitebark pine are to be re-established. Grazing can be effectively used in these areas to manage fuel loads without impact to the young trees, where fire will kill most of the young trees every time it is applied. The Forest Service Rangeland Directives should address the role of grazing for fuel load management and watershed and forest health. This should be done generally as well as addressing special cases like whitebark pine, noxious weed management, etc.

The Rangeland Management Directives need to emphasize the cooperative nature necessary for successful decision making and management of grazing allotments, and the need for flexibility to adapt to conditions on the ground rather than strictly following a cookbook. Ranchers are land management practitioners and manage their land for the long-term health and production they require to sustain their operation. The majority of Forest Service employees do not own land and do not have the benefit of understanding what it takes to manage and be good stewards of the land. Additionally, most Forest Service employees are transient, never staying in one location for a length of time needed to really know the land, the local climate, conditions and environment. Local ranchers, on the other hand, live in these areas and understand the things that effect the local ecosystem. This allows them to adapt their operations real time in response to actual conditions. The decision making on grazing allotments are better made with this type of knowledge rather than blindly relying on a manual or what employees unfamiliar with the area saw in a text book. While the formal education and manual are important, they are only one of many sources of information that should be brought to bear when making land management decisions. And, to be effective, the process must allow changes to be made based on real conditions. This should include things like temporarily or permanently increasing livestock numbers or extending a season of use, allowing more than a once over grazing in a year to achieve a fuel load objective, strategically scheduling rotations to provide fuel breaks, allowing additional flexibility in changing pastures, identifying and implementing range improvements, among others. The directives currently only indicate movement one way – reductions – and do not acknowledge or reflect the need to apply common sense to land management. Further, there has been a history of the Forest Service arbitrarily reducing numbers or citing permit violations due to incorrect assessments by inexperienced forest staff or NGOs with agendas, asserting some “ecological impact” that either does not exist or the condition was due to other causes such as wildlife or some event of nature. There are opportunities for improvement in the implementation of grazing management.

Additionally, with the “restoration forestry” that is occurring many places these days, additional fine fuels are resulting, since opening the tree canopy allows sunlight for more plants to grow. With this additional fuel production should come additional grazing to properly manage this fuel. Livestock grazing and numbers in these areas should be used to address this additional fuel production. Coordinated management strategies for adjacent federal, state and private lands may mean that the Forest Service must adapt its standard approach to business in order to effectively cooperate with the other parties on these projects. State and private land managers often have more experience and better

and more effective management approaches than does the Forest Service, and the Forest directives must allow the flexibility needed in order to achieve the common objectives of the parties. The Forest Service will be a partner, not a dictator, in these shared stewardship arrangements.

The use of grazing should be expanding, not being reduced. Inactive allotments should be activated, and lands that are suitable for grazing should be reopened for grazing as a management tool. Managed grazing is an ecologically friendly land management tool, and is critical to our local and national economies, a safe food and fiber supply for our nation, the continued availability of wildlife habitat that private ranches provide, and enhances wildlife populations, range health and watershed function on our federal lands.

Ranchers owning grazing allotments have associated property rights on those allotments, including improvements, water, and forage. Those property rights date back to laws more than 100 years old, and those laws are still in effect today. The Forest Service has incorrectly made statements to the contrary in these directives. All language asserting or implying a lack of private property rights associated with grazing allotments and permits should be removed. These directives are not the forum to assert legal positions that are not supported by the law and courts. These statements in these regulations do not accomplish any purpose, since the law prevails, but they are inflammatory and perpetuate misinformation to both the Forest Service employees and members of the public.

The directives should address allotment owners/permittees as partners in the permit and management process. A better permit and operating instructions will result if the Forest Service seeks the input of the rancher on best approaches for managing the land areas, scheduling rotations, setting numbers and seasons, identifying opportunities for range improvements, etc., rather than using a dictatorial approach. Ranchers are interested in the long-term health of the rangeland, wildlife and overall ecosystem and will responsibly assure the objectives are achieved if given the opportunity to participate as a partner.

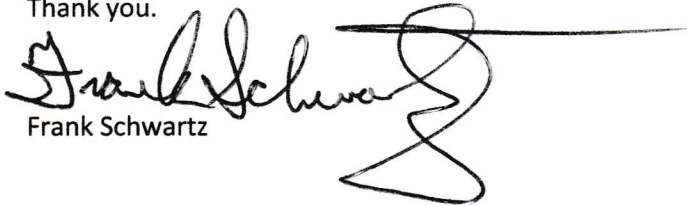
The directives need to specifically address the interface of the range program with other Forest Service activities, such as prescribed fire and timber management. With the growing funding for "restoration" on the Federal lands, this is becoming more important, and the range managers must be involved in these processes. This particular area in the directives is important to Forest Service employees so they have the "do and don't" instructions as they plan and carry out other activities on or near grazing allotments, and the need to assure proper coordination with permittees and allotment owners during all phases of these processes. Coordination does not mean that the permittee must accept whatever impacts these other plans cause. Instead, coordination should result in an acceptable approach to allow the work to be accomplished but not adversely impact the permittee and be agreeable to all. Additionally, when the Forest Service burns fences or other improvements (and this happens very frequently) on the allotments as a result of the prescribed fires, it must be the responsibility of the Forest Service to immediately repair the damage and not hold permittees responsible for any damage, wandering livestock, etc. That same standard should be applied to fences and improvements destroyed by wildfire. Permittees should also not be held responsible for repairing or replacing improvements destroyed by wildfire, or be cited for livestock being outside of areas where fences were destroyed by fire, since the catastrophic wildfires in recent years are the result of the current "let it burn" policy when fires start and many years of passive management of federal land and fuels. Improvements on

allotments are being destroyed as a result of the Forest's past improper management of forest lands, which is not the responsibility of the allotment owners and permittees

The directives should address required training for Forest Service employees related to these directives. The employee knowledge of the details contained in these directives is important so Forest Service employees can properly carry out their duties and provide accurate information to those they interface with (e.g., members of the public, permittees, other government officials). A misunderstanding, misapplication or miscommunication of things as simple as a stubble height requirement (e.g., how to measure, when to measure, etc.) can result in incorrect decisions on range use in a season, lawsuits by NGOs and other troublemakers, wasted time and money of permittees and wasted time and money being footed by the taxpayer. Forest Service employee training is needed and should be a required component of the directive implementation.

I fully support the comments provided to you by the Idaho Cattle Association.

Thank you.

A handwritten signature in black ink, appearing to read "Frank Schwartz", with a long horizontal line extending to the right from the end of the signature.

Frank Schwartz