

T C RANCH

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June 18, 2022

Mr. Drew Stroberg
District Ranger, KNF Goosenest Ranger District
37805 Highway 97
Macdoel, CA 96058

RE: Comments on proposed Antelope-Tennant Fire Recovery Project

Dear Mr. Stroberg:

We appreciate the opportunity to comment on this Recovery Project as we live and work in the Butte Valley community areas that are most affected by the devastation of these fires. Our cattle and hay ranch is located on Red Rock Road East of Macdoel, and we are USFS range permittees on the Bray Allotment within the Antelope Fire boundary, as well as lessees of private rangeland within the Tennant fire area. Ranching is our sole livelihood and as 5th generation livestock and land stewards we care deeply about the health and vitality of the landscape, natural resources, livestock and wildlife on both private and public lands.

We commend the Goosenest Ranger District for proposing an active management plan on a significant portion of the burned areas to re-establish forested areas and promote more resilient forest conditions in general, through a variety of processes for treatment or combined treatments. We support the majority of the proposed current treatments, including salvage logging and hazard tree removal, planting trees and grass seeding, vegetation controls and prescribed burning to reduce future fuel loading, meadow restoration and control of Dwarf Mistletoe. However, we are very disappointed to learn that original proposed use of minimal herbicide treatments to improve survival rates of planted trees has been completely dismissed from the Recovery Project even before the scoping period ended; and that livestock grazing has not even been considered as a possible treatment tool to mitigate future fuel loading and invasive species establishment, or to contribute towards achieving improved wildlife habitat and overall desired conditions of the project. In addition, we would like to see more designated acreage included in grass seedings treatment to facilitate habitat and forage improvements for both wildlife and livestock grazing.

Herbicide Usage: The complete dismissal of this treatment option to improve seedling survivability appears to be an emotional response that completely ignores the proven successful outcomes of herbicide usage during reforestation on other National Forests and private timber industry lands, as well as the Goosenest Ranger District's already documented poorer seedling survival rates in reforestation planting completed for the 2009 Tennant and 2014 Little Deer Fires that are both in the vicinity of the project area. Given these facts, combined with the apparent national shortage of seedling trees to even have available to plant, it is absurd to completely disregard this proven effective tool to increase seedling survivability by reducing vegetative competition and the reproduction of some woody and invasive species – especially when only using the proposed targeted manual application method with a single or possible second treatment. We strongly recommend that full consideration be given to the '**cost of failure**' in proven low seedling survival rate due to not utilizing this targeted manual herbicide treatment.

Livestock Grazing: We appreciate that the Goosenest Ranger District is working closely with their livestock grazing permit holders to promote healthy rangelands and achieve reasonable grazing management objectives following the 2021 fires. However, we recommend that livestock grazing be considered as an additional treatment tool in the Recovery Plan because cattle can play an important contributing role in reducing fine fuel loads and helping prevent encroachment of invasive species through managed grazing practices. Grazing stimulates native grass growth throughout the area grazed, and can mitigate invasive species from getting a foothold in ecosystems, especially when applied as a targeted treatment when other treatment options may not be practical. Invasive species, like cheatgrass (*Bromus tectorum*) are more likely to encroach after a catastrophic fire and increase competition for native plant regrowth. Grazing practices can be utilized as an adaptive tool to target established cheatgrass populations to reduce that future fuel load and improve wildlife habitat. A recent study has recommended “extensive or targeted intensive grazing as a cost-effective method to reduce wildfire risks...especially in ecosystems with high fire risk, such as Mediterranean” climates like that which predominates much of California¹, including the Butte Valley area. Other research from the University of California Cooperative Extension highlights the value that cattle grazing can have for reducing fine fuel loads, thus reducing the intensity and spread of wildfires.² We strongly believe that planned livestock grazing practices can be an effective tool to achieve resource objectives and recommend that when the drought conditions improve to provide adequate water and forage levels that allotment AUM's be restored to full permit numbers in the fire recovery areas, and consideration be given if temporary increases in targeted grazing AUMs in specific areas would be beneficial in mitigating invasive species and/or creating fuel breaks.

¹ Julia Rouet-Leduc *et al.*, *Effects of Large Herbivores on Fire Regimes and Wildfire Mitigation*, JOURNAL OF APPLIED ECOLOGY (Sept. 2021), available at <https://besjournals.onlinelibrary.wiley.com/doi/10.1111/1365-2664.13972>

² Devii Rao, *The Benefits of Cattle Grazing for Reducing Fire Fuel and Hazard*, LIVESTOCK & RANGE (Aug. 2021) available at <https://ucanr.edu/blogs/blogcore/postdetail.cfm?postnum=43533>

Native Grass Seeding Treatments: We commend the Goosenest Ranger District for including Native Grass Seeding as one of the proposed treatments/combined treatments in this Recovery Project as we believe it is very important to re-establish growth of desirable plant species as soon as possible to help deter invasive species infestation.

However, with 57% of the total acreage burned being categorized in the highest level of fire severity, and assuming that the natural seed banks of native grasses have been largely destroyed in the areas of high fire severity, the Recovery Plan only shows planned grass seedings on 7,611 acres of the Project proposal. It is understood that grass seedings are prioritized for management areas designated as winter range, forage, and bald eagle areas, but the defined acreage for just winter range and forage total about 27,590 acres per the management area map, thus only 27.5% of those acres (7,611) are planned for grass seeding, leaving 19,979 acres with no seeding plans and thus more susceptible to infestation of invasive species. We recommend considering re-evaluation of those remaining 19,979 acres now, almost a year after the fire, to confirm areas that have no native grasses returning due to seed bank destruction, and based on that assessment consider adding more acreage to the grass seeding treatment areas if possible.

One further comment on this topic would be that if 'native' grass seed is unavailable to purchase for the full amount of designated acreage, please consider utilizing other desirable grass species that are similar to native. Planting similar desirable grass species is a much better option than just allowing the invasive species to encroach and populate, thus defeating the desired recovery conditions and creating increased future fuel loads.

Thank you for this opportunity to comment on the Antelope-Tennant Fire Recovery Proposal.

Sincerely,



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