

Submitted via online form at <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65081>

November 20, 2023

Heather Stewart, Environmental Coordinator
United States Department of Agriculture Forest Service
1600 Tollhouse Road, Clovis CA 93611

RE: Sequoia and Sierra National Forests Prescribed Fire Project

The California Cattlemen's Foundation (CCF) appreciates the opportunity to provide input on the Sequoia and Sierra National Forests Prescribed Fire Project. CCF is a 501(c)(3) California Nonprofit Public Benefit Corporation representing all cattle ranchers and beef producers throughout California. CCF's purpose is to support and engage in educational, legal, charitable, and research activities related to cattle ranching in California. The ranchers represented by CCF pride themselves on the responsible stewardship of the state's land, water, and wildlife resources.

As a similarly aligned organization, CCF wholly supports the efforts of this proposal to proactively plan treatments in fire adapted landscapes and acknowledge and promote cultural burning and tribal benefits, with intent to improve ecosystem structure and function and restore watersheds, reduce risks to communities, and increase forest resilience by remediating the effects of decades of fire exclusion.

Our organization seeks to highlight the opportunity to advance these goals through the implementation of grazing to supplement and support the application of prescribed fire.

As described under "Control Lines and Pre-treatment" of the Proposed Action for Scoping, Pre-treatment is going to be necessary in most areas to ensure low intensity fire behavior and mitigated risk to valued resources and assets.¹ Currently, mechanical treatments such as hand piling and thinning are the primary sources of removing vegetation.

CCF offers the suggestion that the Forest Service utilize contracts with local cattle ranchers where feasible and appropriate to provide a prescribed grazing program in areas that require Pre-treatment in addition to mechanical thinning of larger fuel types such as the felling of hazard trees and subsequent chipping and mastication as appropriate. In areas where cattle grazing is not

¹ USDA Forest Service Sequoia and Sierra National Forests Prescribed Fire Project Proposed Action for Scoping
<https://usfs-public.app.box.com/v/PinyonPublic/file/1340090932367>

² Patch Burn grazing - efotg.sc.egov.usda.gov. (n.d.). https://efotg.sc.egov.usda.gov/references/Public/OK/range_ok-16_Attachment.pdf

appropriate, we recommend that smaller ruminant animals such as sheep and goats be assessed for feasibility.

In the interest of altering the fire return interval such that it more closely resembles historic fire returns, we recommend the Forest Service offer lease agreements to local ranchers to implement Patch Burn Grazing as a post-fire treatment. This practice allows for the benefits associated with traditional Management-intensive Grazing without the need for interior fencing to manage cattle.²

By implementing a rotational prescribed burn schedule in large tracts that are grazed by cattle, the Forest Service would be better able to plan and execute the treatment of fuels on the 184,000 to 488,000 acres recommended annually by current fire return interval departure analysis¹. Per the current plan to revisit landscape prioritization, stakeholder engagement, and implementation planning in reoccurring five-year cycles, the Forest Service would be able to test the exact effects of a Patch Burn Grazing program within the selected areas and make changes as needed.

The California Cattlemen's Foundation appreciates the opportunity to comment on the proposed action for scoping in the Sequoia and Sierra National Forests Prescribed Fire Project and looks forward to the potential of working together further on this matter.

Sincerely,



Jared Mandrell
Director of Public Policy
California Cattlemen's Foundation

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