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RE: Social and Ecological Resilience Across the Landscape 2.0 Draft Environmental Impact Statement

Supervisor Kuiken:

The California Cattlemen's Foundation (CCF) and California Cattlemen's Association (CCA) appreciate the opportunity to comment on the Draft EIS for Social and Ecological Resilience Across the Landscape 2.0 (SERAL 2.0) in the Stanislaus National Forest.

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. CCA is a statewide trade organization representing more than 1,700 cattle ranchers, including several grazing permittees operating within the Stanislaus National Forest. The ranchers represented by CCF and CCA pride themselves on the responsible stewardship of the state's land, water, and wildlife resources. **Our organizations urge the United States Forest Service (USFS) to update SERAL 2.0 to recognize the important role played by cattle grazing through the explicit implementation of cattle grazing and practices to support range permittees.**

Implementation of Targeted Cattle Grazing

The current draft states that "For SERAL 2.0, targeted grazing using sheep or goats would be utilized in selected areas of fuelbreaks to control shrubs and maintain post treatment understory fuels conditions in fuelbreaks."¹ This determination is seemingly based on a 2014 article, *Goat grazing as a wildfire prevention tool: a basic review*.² This article does not make a statement that grazing with one species is more effective than another, but rather that they can be used in conjunction to accomplish desired goals.

Critical components of sheep and goat treatment are listed as "prevention of the impacts of overgrazing, including increased erosion from ground cover loss and soil compaction." Current research supports that these objectives can be accomplished with great efficacy through managed cattle grazing.

¹ USFS Social and Ecological Resilience Across the Landscape 2.0 Draft Environmental Impact Statement Volume 1, <https://usfs-public.app.box.com/v/PinyonPublic/file/1445729003645>

² Lovreglio, R., O. Meddour-Sahar, and V. Leone. 2014. Goat grazing as a wildfire prevention tool: a basic review. *IForest* 7:260-268.

A 2022 study published in *Rangeland Ecology & Management* stated, “Findings from our multistate experiment indicate targeted cattle grazing can effectively create and maintain fuel breaks on highly flammable, cheatgrass-dominated rangelands. And with careful management on parts of ranching operations and resource managers, fuel break treatments can be applied without causing further degradation to these invaded ecosystems.”³ This finding has been further supported and advanced through the documented use of virtual fence technology for cattle grazing. Boyd et al. has reported that virtually fenced cattle grazing reduced standing fine fuel biomass by 42% and a nearly 50% utilization.⁴

As currently written, the implementation of targeted grazing would treat 8 to 10 acres per day with bands of 1,000-15,000 sheep and goats for a yearly treatment of approximately 3,000 acres. Through the use of targeted cattle grazing or multi-species grazing with cattle, the same acreage could be treated with far fewer animals (simplifying logistical considerations for prescribed grazing treatments, or a greater area could be treated to more broadly achieve target fuel loads. This change would actively advance the goal of 7,500 acres currently listed as “Fuelbreak maintenance using herbicides.” The proposal explicitly calls for additional tools to maintain the desired condition without the use of herbicides and in addition to prescribed fire.

Several factors in the Draft EIS weigh in favor of considering cattle for prescribed grazing treatments on the Stanislaus National Forest. For instance, the Draft EIS suggests that the “scale of opportunity [for prescribed grazing treatments] would be evaluated based on the potential for sheep and goat predation,” among other factors. To some extent, the risk of predation upon cattle is lower than the risk of predation for sheep and goats. For instance, cattle are less likely to be preyed upon by coyotes than are sheep or goats. Additionally, larger predators like mountain lions and bears – and wolves, which could foreseeably occupy the Stanislaus in the near future – often prey upon *numerous* sheep or goats in one attack, whereas attacks on cattle herds are typically limited to one or two animals.

While the Stanislaus National Forest ought to consider prescribed grazing by cattle broadly, it is worth nothing that cattle producers with active grazing permits on the Stanislaus and other National Forests may provide advantages in terms of achieving the desired outcomes of SERAL 2.0. Cattle producers who already graze to the standards and guides detailed in their term grazing permits and annual operating instructions are far better equipped to implement the design features outlined in the Draft EIS – including infrastructure deployment, invasive plant controls, and monitoring – than are contract sheep and goat grazers inexperienced with grazing within the Forest.

Finally, opening the project’s targeted grazing treatments to cattle producers who already graze National Forest lands under term grazing permits would directly advance Mandatory Design Feature TARG-5, which suggests that “Livestock operators with specific experience in grazing operations for fuel reduction should be prioritized for targeted grazing contracts or agreements.” While USFS may consider term grazing permits to be oriented toward forage utilization rather than fuel reduction, the two go hand-in-hand, and operators’ demonstrated ability to achieve desired conditions on grazing allotments is likely to translate well in terms of achieving desired targeted grazing outcomes.

³ Clark, P., and Porter, B. 2022. Evaluating the efficacy of targeted cattle grazing for fuel break creation and maintenance. *Rangeland Ecology & Management*.

⁴ Boyd, C. et al. 2023. Using Virtual Fencing to Create Fuel Breaks in the Sagebrush Steppe. *Rangeland Ecology & Management*.

Practices to Support Range Permittees

Several members of the CCA are permittees within the Stanislaus National Forest and SERAL 1.0 and 2.0 project areas. It has become clear that there are improvements that must be made in SERAL 2.0 to better support the work of permittees in the region.

Communication between USFS staff and permittees regarding ongoing and planned projects that have the potential to affect operations must be delivered effectively and well in advance. During SERAL 1.0, ineffective communication caused damage to critical infrastructure during mastication and burn projects that were not replaced in a timely manner. During SERAL 1.0, the replacement of infrastructure damaged by agency operation was borne by the permittees. In future instances, it is imperative that damage caused by ongoing projects be the responsibility of the agency and not the permittee.

The omission of hazard tree removal from the current draft presents a safety issue for permittees and the National Forest as a whole. Dead and dying trees exist throughout the landscape both pre and post fire without appropriate and timely action. CCA strongly urges that a National Environmental Policy Act (NEPA) determination be applied to the removal of hazardous trees.

Conclusion

With evidence that cattle grazing can greatly reduce fuel loads over a large area with the flexibility and positive effects associated with grazing sheep and goats, USFS has no reason not to include targeted cattle grazing in the SERAL 2.0 plan. USFS staff have the opportunity to make meaningful changes to SERAL 2.0 that correct shortfalls from SERAL 1.0 and better support the work of permittees to achieve stated objectives.

The California Cattlemen's Foundation and California Cattlemen's Association appreciate the opportunity to offer feedback to the Draft Environmental Impact Statement for the Social and Ecological Resilience Across the Landscape 2.0.

Sincerely,



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Kirk Wilbur
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