



September 20, 2024

United States Forest Service
Director, Ecosystem Management Coordination
201 14th Street SW, Mailstop 1108
Washington, DC 20250-1124
Submitted online via <https://cara.fs2c.usda.gov/Public//CommentInput?Project=65356>

RE: Amendments to Land Management Plans to Address Old-Growth Forests Across the National Forest System Draft Environmental Impact Statement

To Whom It May Concern:

The Idaho Cattle Association (ICA) provides the following comments regarding the U.S. Forest Service's (USFS) Draft Environmental Impact Statement (DEIS) to address old-growth forests. These comments are submitted on behalf of the ranchers who have permits to graze livestock within the national forest system in Idaho 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 U.S. Forest Service System 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. We have significant concerns that this plan could limit our ability to use and enjoy these lands and will have detrimental environmental consequences as the needed active management of the forest lands become limited through the plan's implementation.

It has been our experience and observation that, in general, USFS lands have been both undermanaged and mismanaged for the past few decades. Preservationist philosophies have limited active land management which in turn have created unsustainably dense forests with dying trees that carry dangerously high fuel loads and result in catastrophic fires.

The nation's largest wildfire in 2022, the Moose Fire, occurred in Idaho in heavily timbered steep terrain full of dead and dying trees, and old-growth timber. Coincidentally, the annual Idaho Governor's trail ride event occurred there just the year before. The focus for the discussion at the event was on the mismanagement of such areas and the likelihood of catastrophic fire. True to our concerns, the area burned the next year with a fire unable to



be controlled due to the extremely high fuels buildup from years of mismanagement and non-management.

An aphorism that has been repeated frequently in Idaho in recent years has been, “log it, graze it, or watch it burn.” While it may be considered only a simple catch phrase, there is much truth in these words. Catastrophic wildfire is certainly the biggest and most pervasive threat to the trees that grow on USFS land. In our experience, the increasing size of wildfires is largely due to the restrictive management policies that the USFS has put in place over the years. The hands-off policies related to logging, thinning, and other active management techniques have resulted in overgrown forests that have become diseased, unhealthy, and unproductive.

It is our strong concern that this DEIS, while may be well-intentioned to protect old-growth forest, will actually cause the opposite results. When a protective layer of designation is placed on federal lands, the ability to manage those lands ultimately becomes restricted. While the plan may say, or even intend otherwise, these decisions are typically made in the courtroom when legal challenges are filed to any active management projects. The additional protective designation of “old-growth” forest will give preservationists the tool they need to litigate and prevent any activity they disagree with. Judges often rule in their favor, not because it is best for the land or the ecosystem, but because a federal plan says an area needs to be protected, regardless of the details of the plan.

We also want to emphasize the value of grazing in managing USFS lands and protecting old-growth forests from the threat of catastrophic wildfire. Wildfire is currently considered the biggest risk to public lands. Grazing is the most sustainable tool at the USFS’s disposal to manage this threat. Before being finalized, the DEIS should incorporate language citing the importance and use of livestock grazing to control fuel loads. Grazing controls the amount and distribution of forages, which helps to prevent the start and spread of wildfires. There is an increase in wildfires due to many factors including the spread of invasive annuals, which has created a consistent and detrimental grass-fire cycle. When there isn’t grazing on the land, there is an accumulation of dead plant material, called thatch. This layer of dead biomass not only blocks new generations of plants from growing, but it is also very flammable and poses a fire threat. Grazing rangeland forages can substantially alter the fuel characteristics, by reducing the continuity, height, and amount of plant material. Livestock can even increase the moisture content of the plant community. This directly affects the fire severity, flame height, and rate of spread, and intensity... overall decreasing the likelihood and potential effects of wildfires. Grazing by livestock is often the most feasible and efficient tool for managing fire fuels across sagebrush rangelands (Davies et al. 2022). Grazing provides the proactive approach that is required to manage fires and fuels in the US.

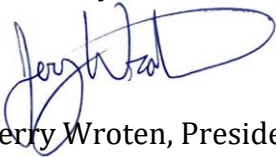
Beyond wildlife, another significant concern we have related to this DEIS is that it may result in limitations on control of decadent and encroaching pinyon juniper stands. Pinyon juniper has been proven to create an abundance of challenges to the landscape including reduced plant diversity, over-consumption of limited water resources, increased fire risk, negative consequences to wildlife species such as sage grouse, and associated increased invasive species spread. Studies have shown that as pinyon juniper trees establish in shrublands, herbaceous and shrub cover is greatly reduced under competition, where trees have a competitive advantage for resources such as water, nutrients and sunlight. This greater density of trees also increases the fuel load and the chance of high-severity fire. (Farzan, S., et. al. 2015). This DEIS should not attempt to limit the control and reduction of



pinyon juniper. Where control actions have been able to go forward, the results have been extremely beneficial to the landscape. In several completed studies, where pinyon juniper has been removed, water availability, native plants, and sage grouse habitat has dramatically increased (Bates, D., et al. 2017 and Deboodt, T. 2009). We are very concerned that this plan, if implemented, would reduce or limit the important juniper control projects that are occurring and will discourage their implementation in the future.

In this DEIS, the USFS is seeking for strategies to manage for and reduce risks which limit the sustainability and resiliency of old-growth trees in our national forests. The answer can be found in returning to more active management and use of the landscape by proactively managing its abundant natural resources through the sustainable practices of logging and grazing, rather than employing the flawed preservationist strategies of limiting use and taking a "hands off approach". The answer is not in applying a protective layer on top of existing management. We ask that the USFS does not implement this plan.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jerry Wroten", with a large, stylized flourish extending to the right.

Jerry Wroten, President
Idaho Cattle Association

