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Comments: Please see the attached document.

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RE: Sequoia and Sierra National Forests Prescribed Fire Project Draft Environmental Assessment

The California Cattlemen's Foundation (CCF) appreciates the opportunity to provide input on the Sequoia and Sierra National Forests Prescribed Fire Project Draft Environmental Assessment. 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.

CCF generally supports the implementation of the Proposed Action (Alternative A), though we continue to urge the Forest Service to supplement the Proposed Action with pre- and post-fire treatments utilizing livestock grazing, which can aid the long-term efficacy of the Project's wildfire-resilience goals.

We appreciate the acknowledgment that targeted grazing was considered to achieve fuel objectives during the scoping period. However, we truly believe that dismissing such a tool is a missed opportunity for the Forest Service to accomplish their desired vegetation conditions with increased efficiency and reduced disruption to the treatment area.

Pre- and Post-Treatment Activities

As outlined in the Direct Effects section of the EA, hand or mechanical treatments have the potential to damage plants and disturb soil, roots, and sensitive species. While the utilization of these treatments is limited to only 86,341 acres for mechanical treatments and 227,470 acres for hand treatments, the anticipated negative effects can be reduced by substituting cattle grazing where appropriate (footnote 1).

One of the many scenarios that demonstrate the opportunity to leverage livestock grazing for reducing fuel loads is on the Wildland-Urban Interface. Livestock grazing provides fuel reduction that is less disruptive and safer to ecology and urban stakeholders alike. Fuel breaks created by targeted cattle grazing has been observed to "sufficiently reduce[] the rate of spread and flame length[]" (footnote 2).

Per Appendix E, the Range Specialist is granted the ability to identify if pre- and post-grazing management is necessary to achieve the desired vegetation conditions. If the Forest Service was to incorporate this consultation early, they would be able to plan and execute pre- and post-treatment more effectively. Moderate grazing by cattle as a pre-fire treatment can increase native plant community resistance to exotic annual grass invasion and dominance post-fire (footnote 3).

Additionally, the design features outline a framework where the Forest Service already anticipates working closely with local grazing allotment permittees to coordinate temporary displacement of livestock during treatment of areas.

In the scoping process, CCF suggested that the Forest Service utilize contracts with local cattle ranchers where feasible and appropriate to manage and 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 (footnote 4).

We believe that implementing such a management strategy would leverage existing relationships that are already built into the design feature of the project under RAN-1, RAN-2, and RAN-3.

Conclusion

It is our sincere hope that livestock grazing can play a much larger role in accomplishing the desired outcomes of the project through careful planning and implementation. The California Cattlemen's Foundation appreciates the opportunity to comment on the Sequoia and Sierra National Forests Prescribed Fire Project Draft Environmental Assessment.

Sincerely,

Jared Mandrell

Director of Public Policy

California Cattlemen's Foundation

Footnotes:

1) Taylor. 2007. CHAPTER 12: Targeted Grazing to Manage Fire Risk. https://bof.fire.ca.gov/media/8861/2-d-i-targeted-grazing-handbook_chpt12.pdf

2) Clark, et al. 2023. Evaluating the Efficacy of Targeted Cattle Grazing for Fuel Break Creation and Maintenance. *Rangeland Ecology & Management*. Volume 89 69-86.
<https://doi.org/10.1016/j.rama.2023.02.005>

3) Davies, et al. 2016. Prefire Grazing by Cattle Increases Postfire Resistance to Exotic Annual Grass (*Bromus tectorum*) Invasion and Dominance for Decades. *Ecology and Evolution*. Volume 6, Issue 10.
<https://doi.org/10.1002/ece3.2127>

4) USDA-NRCS Patch Burn Grazing Information Sheet,
https://efotg.sc.egov.usda.gov/references/Public/OK/range_ok-16_Attachment.pdf

Attachments:

CCF Sequoia and Sierra Draft EA Comment Letter.pdf