

Data Submitted (UTC 11): 11/6/2018 8:00:00 AM

First name: Sarah

Last name: Ryan

Organization: Washington State Cattlemen's Association

Title: Executive Vice President

Comments: November 5, 2018

RE: Colville National Forest Plan Revision Objections

The Washington Cattlemen's Association (WCA), the Public Lands Council (PLC), and the National Cattlemen's Beef Association (NCBA) submit the following objections to the Colville National Forest Land Management Plan.

WCA is a Washington not-for-profit trade organization which represents the interests of cattle producers on legal and legislative issues including the use of natural resources. WCA was founded in 1926 and is supported through a grassroots network of individual livestock operators and county cattlemen's organizations. Current membership in the WCA includes 26 affiliated county organizations and approximately 1,200 allied and individual members engaged in cattle ranching. WCA regularly promotes agriculture and the cattle industry by, among other things, advocating at the local, state, and federal levels. The Public Lands Council (PLC) represents public lands ranchers in Washington, D.C. Since 1968, PLC has worked with Congress and the federal land management agencies to maintain a stable business environment in which livestock producers can conserve the West and feed the nation and world. The National Cattlemen's Beef Association (NCBA) has represented America's cattle producers since 1898, preserving the heritage and strength of the industry through education and public policy. As the largest association of cattle producers, NCBA works to create new markets and increase demand for beef. Efforts are made possible through membership contributions.

Our members include those that depend on the ability to graze livestock on the Colville National Forest (Colville) and own land in the vicinity of the Colville that would be threatened by wildfire on the Forest. Our members graze livestock on the Colville grazing allotments and are concerned that the Colville National Forest Land Management Plan (Plan) will hinder the reasonable use of the allotments.

As one member and permittee on the Colville National Forest relayed: "Everything in the plan could have potential impacts to grazing permittees. Permittees have been the managers, labor, and protectionists of these resources since the beginning of the permit system, multiple generations in some cases. As permittees there is not one part of the forest they are not involved in. Permittees treat these public lands with the same respect and pride as they treat their private lands."

Introduction and summary of objections.

The purpose of the action is to revise the 1988 forest plan for the Colville which encompasses approximately 1.1

million acres in Northeast Washington. WCA and our members have been participating in the Colville plan revision process since its inception. During the Plan revision process, commenters have expressed the importance of livestock grazing to the economy, culture, and resource management across the greater Colville area.

WCA's objections are focused on primary areas where the proposed Plan or Final EIS (FEIS) can be improved to better fulfill the multiple use mandates while simultaneously addressing environmental concerns. Some of these types of improvements include: limiting or avoiding

unnecessary restrictions of livestock grazing in riparian areas and avoiding the Plan's reduction of public access.

OBJECTION: Aquatic and Riparian Conservation Strategy-modified (ARCS-mod).

The information regarding the development of ARCS-mod is inadequate and lacks transparency. There has been no public involvement in updating plan components in ARCS.

Additionally, the ARCS plan components were updated for the purposes of clarification and that the interdisciplinary team "considered operational constraints." However, the interdisciplinary team went well beyond "clarification" and imposed unreasonable restrictions on livestock grazing standards and guidelines and expanded the key watershed network.

Despite these procedural missteps, the ARCS-mod standards and guidelines are strongly objected to by WCA because (1) current riparian management strategies are effective in maintaining or improving conditions, (2) the ARCS-mod lacks flexibility to adapt to site-specific conditions, and (3) the ARCS restrictions will degrade riparian resources.

RESOLUTION: ARCS, like INFISH, is a major decision with long-term implications and was, appropriately, open to public comment and review. Similarly, the ARCS-mod updates to ARCS will have long-term implications as well as direct, immediate consequences and the Forest Service must be willing to change the ARCS in response to public comments on the plan. The Forest Service should consider modifying INFISH to provide more flexible restrictions tailored to site-specific conditions to avoid imposing limits beyond what is needed for the optimal level of stream protection.

OBJECTION:

Current riparian management strategies are effective in maintaining or improving conditions; there is no ecological need for increasing restrictions in riparian areas. Riparian areas and water quality are either maintaining or improving under the current INFISH strategy. Fisheries Report at 47, 53.

The ARCS-mod lacks flexibility to adapt to site-specific conditions. The current INFISH buffers are far too stringent as a "one-size fits all" approach to riparian management; ARCS-mod doubles current INFISH riparian buffers for intermittent streams, lakes and natural ponds. These arbitrary "one-size fits all" buffers do not allow for management decisions based on the existing ground conditions.

RESOLUTION: The Plan should avoid these arbitrary buffers and instead develop an adaptable alternative that

provides site-specific flexibility.

OBJECTION: Annual Grazing Use Indicators, MA-GDL-RMA-11

The stubble height requirement of 4 inches does not account for the research indicating that

2.75 inches may be adequate stubble height. The Range Report states that many of the riparian areas on the Colville are unable to produce 4 inches of stubble height where there is no grazing. Range Report at 28. The stubble height requirement could lead to 14,000-16,500 fewer AUMs, a 50 percent reduction from current levels. Implementation of similar standards and guidelines have led to a 27 percent reduction in authorized grazing in Region 5. Range Report at 28. The stubble height restrictions alone will ensure a reduction in authorized grazing by shortening grazing seasons or

the number of livestock on the allotments. The Colville is 1.1 million acres and it is unrealistic to broadly apply stringent standards to every riparian area within such a large land-base.

Also included are the following requirements, which are too prescriptive and restrictive: utilize no more than 30-45% deep rooted herbaceous vegetation, 20-25% limit to streambank alteration. 30-40% use of wood species.

RESOLUTION: Consistent with the best science and the limited capacity of all Colville rangeland to grow 4 inches of stubble height, the Plan should either change the guideline to 2.75-8 inches or eliminate the stubble height requirement and adopt a site-specific approach to managing riparian areas through allotment management plans with general guidance to maintain or improve riparian conditions. The percent utilization restrictions also should be relaxed to the current levels in permits and the need for any more stringent limits on utilization should be adopted through the allotment management plan.

OBJECTION: Aquatic and Riparian Conditions, MA-STD-RMA-01

"[W]hen riparian management areas are properly functioning, project activities shall maintain those conditions," is both overly strict and vague. "Shall" requires strict compliance and does not provide any flexibility. This is problematic because the standard contains vague language, "maintain." Compliance with this standard as written is subject to interpretation and will be strictly enforced. Therefore, permittees and the Colville will be subject to potential claims upon implementation.

RESOLUTION: Use flexible and concise language that allows for practical implementation of project activities when riparian management areas are properly functioning, such as "should" in place of "shall."

OBJECTION: Recreational and Permitted Grazing Management - Fish Redds, MA-GDL-RMA-13

Avoid livestock trampling of federally listed threatened or endangered fish redds. The wording of standard is an improvement over the DEIS. However, blanket "avoidance" only allows one way to comply, enclosure fencing.

Exclosure fencing will be detrimental to wildlife movement and diminish the growth and health of vegetation inside the exclosure, increasing weeds and invasive species.

Fencing is not only extremely expensive and labor-intensive, but this method could make pasture moves more difficult.

RESOLUTION: Use flexible and concise language that allows for practical implementation of project activities when riparian management areas are properly functioning.

OBJECTION: Management of Livestock Grazing to Attain Desired Conditions, MA-STD-RMA-09

The wording of standard is an improvement over the DEIS. However, concern is raised in the implementation and lack of clarity. Removal of livestock requires a significant change to management of the forest and could adversely impact the ecological balance.

RESOLUTION: The Colville should use flexible and concise language that allows for practical implementation of project activities.

OBJECTION: Increased restriction: access to grazing allotments by reducing road densities and creating non-motorized and wilderness areas.

Reductions in road densities, recommending wilderness designation and designating backcountry areas substantially increases the costs of livestock grazing as this will eliminate access to grazing allotments. The reduction in road density and motorized access also limits the public's recreational opportunities which is not the direction the Plan should take given the significant aging of the population that will occur over the next twenty years.

RESOLUTION: The Colville should develop an alternative that meets the needs for livestock grazing in these areas; the Colville should be identifying ways to increase livestock grazing, meeting the unfilled local demand, rather than burdening the current permittees with increased costs. The USFS should not ignore the benefit that grazing contributes to limiting the increased risk wildfire.

OBJECTION:

The recommendation of 68,300 acres, 6 percent of the Colville, as wilderness will have a long-lasting negative effect on livestock grazing if Congress designates this area as "wilderness." If designated as wilderness by Congress, grazing is likely to cease on the portions of inactive

allotments within the wilderness boundary. This is not in line with Congressional direction addressing livestock grazing in wilderness areas. "There shall be no curtailments of grazing in wilderness areas simply because an area is, or has been designated as wilderness, nor should wilderness designations be used as an excuse by administrators to slowly 'phase out' grazing." FSM 2323.22(1). Further, grazing is allowed to continue on allotments which were vacant on the date of wilderness designation. FSM 2323.24(2). Even where grazing is allowed in Wilderness, grazing is significantly restricted and costs are increased because new roads and power tools to maintain the allotments are prohibited.

This further reduction of livestock grazing is unacceptable given the Colville is already unable to meet the demand for authorized grazing under the current plan. Grazing is an important use to the local ranching industry and local communities and the Colville is currently unable to meet the local demand for authorized grazing. The Plan proposes to restrict motorized use on 17 percent (wilderness and backcountry) of the Colville. Although grazing of active allotments within the wilderness boundary could continue, it will not be feasible because mechanized equipment will no longer be permitted. Similarly, livestock grazing will not be feasible in "backcountry" as standard MA-STD-BC-01 prohibits motor vehicle use. It is common practice for permittees to use off-highway vehicles to manage allotments and by eliminating this valuable tool, the plan increases the time, labor, and capital required to properly manage grazing allotments.

The desired conditions, stated above, along with the key watershed network expansion, will greatly reduce access to grazing allotments thereby increasing the time, labor, and capital required to properly manage grazing allotments.

RESOLUTION: No further/additional wilderness and backcountry designations, beyond the Salmo- Priest.

OBJECTION: The Plan will increase the risk of wildfire by reducing access through road density reduction and increasing fuel loads by reducing grazing.

Fuel reduction treatments have been utilized by the Colville as a proactive step to reduce the risk of catastrophic fire. The Colville fire managers have been faced with unprecedented fire behavior and that the fire frequency and severity has been altered, creating conditions susceptible to uncharacteristic fire events. The road density reduction will increase the costs of fuel treatments,

which will result in fewer acres being treated and a likely increase in fire frequency and severity. The road reduction will lead to inefficiencies when managing fires, prescribed or not, as roads are commonly used as fuel breaks. Roads tend to have the largest influence of any single variable on the ultimate size and spread of a wildfire. Increased fire frequency will further restrict grazing as it is generally advised to restrict grazing for a period of one to three years following a large fire. Range Report at 45. The restrictions and lack of access will lead to increased fuel loads and longer response times which will lead to more catastrophic, uncharacteristic fires which will in turn further restrict grazing post-fire, thereby creating a viscous cycle that will harm permittees, natural resources, the public, and private property.

RESOLUTION: The Forest Plan should focus on enhancement of the existing road and trail infrastructure, not

removal of obliteration of roads and trails.

OBJECTION: The EIS analysis is inadequate and fails to provide a reasonable range of alternatives. The Plan fails to provide an alternative that addresses the demand for grazing. It is the objective of the National Forest System to "contribute to the economic and social well-being of people by providing opportunities for economic diversity and by promoting stability for

communities that depends on range resources for their livelihood." FSM 2202.1(4). One desired condition for livestock grazing, FW-DC-LG-02, is for "[a]vailability of lands identified as suited for this use contributes to animal products, economic diversity, open space, and promotes cultural values and a traditional local life style." However, the Plan is not designed to achieve this goal as it will reduce authorized grazing, potentially eliminate portions of grazing allotments, and substantially increase costs for permittees.

RESOLUTION: Design the Plan to recognize the contribution of grazing to economy and social well-being of people in the region. The management of the Plan can impact adjacent private land. We recommend developing an alternative that is consistent with Forest Service policy and the Colville's desired conditions which meets the demand for authorized grazing by restoring grazing on the 16 vacant allotments, modifying INFISH standard to be more (not less) flexible, and maximizing livestock grazing on suitable lands.

OBJECTION: Watershed Condition Framework

We are concerned that the Watershed Condition Framework (WCF) creates a new model for range monitoring that seeks to classify every subwatershed in the Colville forest system into three categories. This concept evaluates subwatersheds as to their functionality by evaluating 12 different criteria for each. The classifications are properly functioning, functioning-at-risk, or impaired function. This is based on a weight-of-evidence approach that considers, at a minimum, the water quality, aquatic habitat, and riparian/wetland vegetation indicators.

This model raises issues with new grazing standards for each classification that will have detrimental impacts on the livestock industry. These new grazing standards will make it difficult or impossible for ranchers to successfully graze on federal lands and meet these standards which would also limit the environmental benefits that grazing may contribute to the forest.

RESOLUTION: Remove reference of WCF in the 2018 revised plan

Conclusion.

We appreciate the effort that was made, between the draft proposed plan and the current plan, to emphasize the local ranger's management of the land and execution of the plan. The current administration is good to work with and shows respect toward grazing as a fire and land management tool. However, there is concern about a future change in agency culture which could result in a lack of collaboration or willingness to work with local grazing

permittees. The current plan, as finalized, will lead to diminished resources due to increased wildfire threat, as well as a substantial economic burden to local economies that depend on appropriate grazing access to forest service lands.

Thank you for your efforts on this process and your consideration of these objections. If you have questions, please contact Sarah Ryan, WCA (509) 925-9871 sryan@wacattle.org or Ethan Lane, PLC, NCBA (202) 878-9126 or elane@beef.org.

Sincerely,

Sarah Ryan, Executive Vice President

Washington Cattlemen's Association

Ethan Lane, Executive Director

Public Lands Council, NCBA Federal Lands