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Re: Comments on Inyo, Sequoia and Sierra National Forest Land Management Plan Revision

Dear Regional Forester Moore and Regional Foresters Armenta, Elliott and Gould:

California Farm Bureau Federation, Tuolumne County Farm Bureau, Calaveras County Farm Bureau, Tulare County Farm Bureau, Mariposa County Farm Bureau, Shasta County Farm Bureau, Modoc County Farm Bureau, Mendocino County Farm Bureau, Stanislaus National Forest Grazing Permittee Association, Dick Gaiser, Bill Gaiser, Bob Brennan, Sheri Brennan, Eloise Fischer and Sanguinetti Cattle Ranch (collectively "Farm Bureau Coalition"), appreciate the opportunity to comment on the United States Forest Service (Forest Service) land management plan revision for the Inyo, Sequoia and Sierra National Forests (Forest Plans).

Healthy forests are critical to California's rural communities whose economic and social fabric rely on the revenues generated by the multiple uses of our National Forests. As "early adopter" forests, the Inyo, Sequoia and Sierra National Forest land management plans (collectively "Forest Plans") will be precedential for subsequent forest plan revisions in California. Because of this, individuals and organizations whose activities may relate more closely to other National Forests in California, have a direct interest in these Forest Plans.

California Farm Bureau Federation is a non-governmental, non-profit, voluntary membership California corporation whose purpose is to protect and promote agricultural interests throughout

the state of California and to find solutions to the problems of the farm, the farm home and the rural community. Farm Bureau is California's largest farm organization, comprised of 53 county Farm Bureaus currently representing more than 53,000 agricultural, associate and collegiate members in 56 counties. Farm Bureau strives to protect and improve the ability of farmers and ranchers engaged in production agriculture to provide a reliable supply of food and fiber through responsible stewardship of California's resources. Through its constituent county farm bureaus, California Farm Bureau Federation represents farmers and ranchers throughout California who have interests in the management of the Inyo, Sequoia and Sierra National Forests.

The Farm Bureau Coalition, including Farm Bureau members, are directly impacted by Forest Plans. Forest Plans have a direct impact on agricultural activity, jobs and annual payroll in many counties throughout California. Sawmill infrastructure is heavily dependent on a reliable wood supply from our National Forests. These sawmills play an essential role in the local economy and provide a destination for wood resulting from the sustainable management of private lands. The California ranching industry also relies on the rangeland available on National Forests. Additionally, forests in California provide all Californians with an abundant source of clean water, clean air, and recreational opportunities. California's forests store and filter more than 60% of the state's water supply.

The Farm Bureau Coalition appreciates the Forest Service's significant investment in public outreach. The summaries and public meetings have been very helpful in improving understanding of the proposed plan revisions and providing insight on how to develop meaningful comments. Because the approximately 2,000 pages of the Draft Environmental Impact Statement (DEIS) and three Forest Plans, in addition to the thousands more pages of supporting material were simply too much to review in the 90 days allotted, California Farm Bureau Federation and many others requested an extension of the comment period. While we believe additional time would have enhanced our analysis, we appreciate the thoughtful response from Mr. Moore describing his decision and offering helpful guidance on developing guidance.

Multiple Uses of National Forests

The most remarkable, and challenging, feature of our National Forest system is the multiple use mandate long a part of Forest Service culture and established in statute by Congress more than 50 years ago. While the emphasis on various uses has ebbed and flowed over time, recently there has been a significant constriction on certain productive economic uses, particularly timber harvest and grazing. We recognize that much of this decline is not due to the Forest Service's actions, and is in fact often contrary to the Forest Service's planning, but rather is caused by other environmental laws and related litigation.

While the Forest Plans and DEIS cannot change these other laws, a thorough DEIS and wise planning can reduce the pressure on the multiple use mandate by establishing a firm foundation to maintain and expand multiple uses, including apiary placements, grazing, mining, timber management, wildlife and recreation. We recognize that the draft Forest Plans and DEIS do recognize the multiple use objectives as a core principle and strongly encourage the Forest Service to not only retain existing language on this point, but significantly expand the emphasis on achieving multiple uses.

In a world of seven billion people, perhaps reaching nine billion in a few decades, multiple use management of large landscapes is an imperative. Many extreme environmental interests take legal and other actions to erode the multiple use objective of National Forests out of the

apparent belief that public lands should be managed principally (or perhaps solely) for ecological purposes. While such a luxury may currently appear feasible in the United States, this concept has no future in other parts of the world or in a future where ecological, social and economic objectives must be balanced.

Our point is that while the Farm Bureau Coalition has direct interests in the management of the Inyo, Sierra and Sequoia National Forests, there is also significant value to the rest of the world and future generations in finding how to manage lands to maximize, not just balance, economic, social and ecological values. While perhaps no one does this better than the Forest Service, the Forest Plan revisions are an opportunity to reinvigorate the multiple use objective and turn the corner on the recent declines in economic activity.

Recommendations: Expand the emphasis on the multiple use mandate by establishing a preference for accepting minor conflicts between uses in order to sustain multiple uses. The Forest Plans should include provisions to encourage and facilitate research and projects that focus on expanding multiple uses.

Local Coordination

Section 219.4 of the 2012 Planning Rule requires the Forest Service to coordinate with State, local and Tribal governments by reviewing the planning and land use policies of local government and displaying that review in the environmental impact statement. Chapter 40 of the 2012 Planning Rule Directives expand on this requirement, which is essential to implementing the Forest Plans in a manner that appropriately incorporates local planning efforts as well as ensuring actions taken on the National Forests reflect local social and economic conditions. Chapter 4 of the DEIS includes a listing of local governments contacted, but does not reflect the analysis required by the planning rule and planning rule directives.

Recommendation: The DEIS should be revised to include the analysis of local plans and policies as required by the Planning Rule and Directives. The draft Forest Plans should be revised to reflect appropriate ongoing coordination with local governments.

Current Conditions

The DEIS and draft Forest Plans do not adequately address the severe tree mortality California is currently experiencing due to drought, insect and disease. The volume of dead trees pose a significant threat to public safety, property and recreational opportunities, as well as the long-term health of the forests. The impacts of tree mortality must be included in the DEIS and Forest Plans or the plans will not be able to meaningfully improve the ecological, social and economic conditions on the Inyo, Sierra and Sequoia National Forests. For example, discussions within the DEIS and Forest Plans pertaining to vegetative desired conditions, single species conservation strategy, desired conditions for terrestrial and riparian vegetation, prescribed fire, watershed quality among others are not realistic as they do not reflect the current condition on these National Forests.

Recommendation: The DEIS and Forest Plans should be revised to reflect the actual, current condition on the forest.

Livestock Grazing

Livestock grazing on Forest Service land, which in many cases was present before the formation of the National Forests, is an essential social, economic and ecological component of National Forests and rural communities. Over the past several decades, grazing on National Forests in California has been reduced by almost 50%, with a 20% decline since the Sierra Nevada Forest Plan was implemented in 2001 (UC Rangelands 2016). While the draft Forest Plans do not focus on grazing because, as we understand it, changes to current livestock grazing management was not identified as a need, we believe that certain changes are important for the Forest Service to consider in order to address pressures for further reductions in grazing. The comments below identify changes to the draft Forest Plans that would support and enhance grazing, while also protecting other uses and achieving ecological objectives.

Benefits of Grazing

Livestock grazing not only benefits ranchers and rural communities, but also provides important environmental benefits that should be more fully recognized. For many ranchers, access to Forest Service allotments is economically and ecologically essential to their operation. Economically because base properties are often not sufficient to maintain an economically viable herd without access to the seasonal forage on the forest, and ecological because the ability to move the herd to the Forest Service allotment provides valuable rest to the base property. Base properties provide working landscapes that benefit wildlife habitat, provide healthy watersheds and offer aesthetically pleasing open space that might otherwise be lost to developments should these properties be sold and subdivided.

Livestock grazing permittees also often provide additional services such as facility maintenance, road maintenance (culvert clearing) and trash removal. In addition, grazing can be a management tool the Forest Service may use to improve range conditions or manage for fire. Scientific support is growing for the value of properly managed grazing related to pre- and post-fire management as well as controlling invasive species.

Recommendation: The DEIS and draft plans should be revised to recognize the benefit of grazing, especially as it can be utilized for pre-fire fuels management, post-fire management and invasive species management. The DEIS should include additional economic analysis of livestock grazing activities in both rural communities and to related base properties. Forest Service grazing managers should also be included in forest planning discussions. We encourage the USFS to participate in studies conducted to analyze how grazing can be increasingly utilized to address pre and post-post fire management as well as invasive species management.

Management Direction

It is important that the management direction identified in the Forest Plans appropriately balances the need for meaningful guidance with the need to avoid specific prescriptions. It should also take into account current information and best available science (NRC 1994). The very prescriptive nature of the current management direction for rangeland management is not in keeping with the objective of the new planning rule and is inconsistent with the stated intent of the Forest Plans as described in their introductions below:

> *"Forest plans are intended to be strategic, meaning they identify long-term or overall desired conditions and provide general direction for achieving those desired conditions. Forest plans focus on outcomes, and are flexible to allow management to adapt to local conditions. Generally, forest plans are not tactical and do not specify particular methods*

that must always be used and do not require resources to be allocated. Forest plans emphasize strategic decisions: "why" and "what," and to a lesser extent, "when" and "where." The "how" decision is generally made at the tactical or project planning level, and includes a set of site specific details of time, place and circumstances of a particular project proposal. "

We understand that much of the current management direction and many standards have been determined to be adequate for meeting desired resource conditions and are therefore being carried over to the plan revisions. Each national forest proposes to manage grazing similar to the current practices (although this approach differs by National Forest) (Sequoia and Sierra National Forests: RANG-FW-STD-01 to 03; SPEC-GGO-GDL-01; Inyo National Forest: MA-RWLD-STD-02; DA-RNA-SUIT-08; SPEC-SHP-STD-01; RANG-FW-STD-01 to 02). This includes grazing management in meadows (MA-RCA-STD-11 to 17; MA-RCA-GDL-06 to 08).

We do not object to the thresholds themselves (i.e. percent allowable forage use or percent allowable streambank alteration) as we recognize many of these have been established for a long time and are effective in maintaining healthy rangelands. However, the use of thresholds as regulatory standards applied across all grazing allotments (regardless of site specific information) and the punitive consequences tied to these standards if not met, is inconsistent with the planning rule as well as the stated intent in these Forest Plans.

We agree that current permitted livestock grazing management does provide stable and resilient rangelands and that continued grazing will result in positive vegetative conditions and trends (as stated on page 359 of the DEIS). However, we are disappointed to see management direction carried forward almost verbatim from previous Forest Plans and amendments, including the Sierra Nevada Forest Plan, without regard for new information or best available science (see below).

Forage utilization standards are an important tool for managing livestock grazing on rangelands. There is a large body of information published over the past 75 years or more on methods of measuring utilization and its proper interpretation in rangeland management. According to a 2005 report by rangeland experts, utilization guidelines should be used to make short-term management adjustments, but they should *not* be used as management objectives or regulatory standards. (University of Arizona, 2007)

While the 40% forage utilization standards (and 30% in meadows in early seral-status) in the draft Forest Plans may be supported by literature and appropriate for some sites, a "one-size-fits-all" approach is not in line with recommendations by leading rangeland scientists and managers, nor is it in keeping with the intended purpose of the new planning rule as stated above.

The team of rangeland experts convened by the University of Idaho concluded, "although stubble height is easy to use, it is not a resource objective and therefore inappropriate as a prescriptive standard in grazing permits and land use plans. It should be used as a guideline or indicator for changing annual management in the Annual Operating Instructions/Plan" (University of Idaho Stubble Height Review Team, 2004).

The originators of the utilization and stubble height monitoring methods never intended for them to be used in isolation from other data, nor to be used as the sole method basis for grazing permit regulation. Using these indicators such as Forest Plan standards, which become terms and conditions in livestock grazing permits "effectively negates the advantages of adaptive

management. The range manager is denied the process through which the inevitable uncertainty regarding response of natural resources to specific management can be dealt with in a collaborative manner." (Cleary et al, 2008)

The very detailed and prescriptive standards for livestock grazing are in direct conflict with the above stated intent of the revised Forest plans. Rather than providing flexibility to "allow management to adapt to local conditions", the following rigid standards have been included and the Forest Service should consider revising the following language to provide appropriate flexibility and reflect the latest science:

Riparian Conservation Area standards for livestock grazing - Sequoia National Forest

- For meadows in early seral status: limit livestock utilization of grass and grass- like plants to 30 percent (or minimum 6-inch stubble height).
- For meadows in late seral status: limit livestock utilization of grass and grass-like plants to a maximum of 40 percent (or minimum 4-inch stubble height).
- If meadow ecological status is determined to be moving in a downward trend, modify or suspend grazing.
- Degraded meadows (like those in early seral statuses with greater than 10 percent of the meadow area in bare soil and active erosion) require total rest from grazing until they have recovered and have moved to mid- or late-seral status.
- Limit browsing to no more than 20 percent of the annual leader growth of mature riparian shrubs and no more than 20 percent of individual seedlings. Remove livestock from any area of an allotment when browsing indicates a change in livestock preference from grazing herbaceous vegetation to browsing woody riparian vegetation.

Riparian Conservation Area standards for livestock grazing - Sierra National Forest

- For meadows in early seral status: limit livestock utilization of grass and grass-like plants to 30 percent (or minimum 6-inch stubble height).
- For meadows in late seral status: limit livestock utilization of grass and grass-like plants to a maximum of 40 percent (or minimum 4-inch stubble height).
    - If meadow ecological status is determined to be moving in a downward trend, modify or suspend grazing.
    - Degraded meadows (such as those in early seral statuses with greater than 10 percent of the meadow area in bare soil and active erosion) require total rest from grazing until they have recovered and have moved to mid- or late seral status.

All three Forest Plans base desired conditions for meadows on seral status rather than a suite of indicators of rangeland health. This does not take into account best science or site potential and assumes that reducing or eliminating grazing alone will result in improved conditions.

Recommendation: The strict requirements for percent forage use based on seral status, stubble height and streambank alteration, and for woody browse in the Riparian Conservation areas in the revised Forest Plans should be removed or incorporated as recommended guidelines or indicators.

Range Standards - Annual Grasslands
On both the Sequoia and Sierra National Forests, annual grassland low elevation rangelands, standards are equally prescriptive, but are in keeping with best science (Bartolome et al, 2002). They also include a clause that allows professional judgment to play a role in determining an adaptive approach based on site conditions.

- Where professional judgment and quantifiable measurements find that current practices are maintaining range in good to excellent condition, the grazing utilization standards above may be modified to allow for the Forest Service, in partnership with individual permittees, to rigorously test and evaluate alternative standards.

Recommendation: Replace the prescriptive residual dry matter standards with language describing that these are guidelines and indicators. Keep the language above allowing adjustments based on professional judgment and coordination with permittees at the local site level.

Inyo National Forest (comment specific to Appendix F):

- We are disappointed to see that the Inyo National Forest has opted to categorically incorporate their existing 1988 Forest Plan range standards and guidelines (as amended) into an appendix (see Inyo Plan Forest-wide range standard 01, page 99). The 20-page Appendix F is extremely detailed and prescriptive in its requirements for analysis and monitoring of rangelands and is overly restrictive of grazing management. We find this decision to be incompatible with the intent of the new planning rule and the stated intent of these plan revisions. Additionally, these standards were developed over 20 years ago and do not necessarily reflect best available science and information.

Recommendation: Draft Forest Plan standards should be revised to describe rangeland management direction as broad goals or guidelines and not include the specific prescriptive requirements identified above. The Forest Plans should include language that would allow a site specific determination based on professional judgment and quantifiable data in partnership with the permittee to determine appropriate management practices to help achieve those goals.

Desired Conditions
Desired conditions for rangelands should reflect best science and consideration of site potential based on multiple indicators of rangeland health (Pellant et al 2006, Bestelmeyer et al 2011). Desired conditions for rangelands and Riparian Conservation Areas should be realistic and take into account factors other than current permitted livestock grazing (climate change, fire exclusion, altered states and transitions) in determining management direction. For example, it is unrealistic to expect all meadows to be in a mid to late seral status. Management direction should allow for adaptive management based on local, site-specific conditions and potential in keeping with the stated intent of the new plan revisions.

Recommendation: Remove the specific language about seral status in meadows. Consider best available science regarding site potential (i.e. Briske et al 2005).

Project Planning – Range NEPA
We understand that the revised Forest Plans provide broad management goals and objectives and that much of the site specific management of individual grazing permits will be determined during the Rangeland Planning and Decision-making process (Allotment NEPA) and individual Allotment Management Plan development. We are in agreement with this approach with the following considerations:

- We are concerned about the commitment on each National Forest to completing NEPA on allotments that have not undergone current NEPA analysis and decision-making. The Region does not have a good record of NEPA compliance on grazing allotments over the last several years. We are concerned that without a commitment to completing this task, current grazing permits will be vulnerable and opportunities for use of vacant allotments will continue to be lost.
- We understand that a determination of suitability of lands for livestock grazing has been carried over from previous forest planning processes. We were also informed during the public meetings that the rangeland capability and suitability criteria contained in Appendix K of the Sierra Nevada Forest Plan Amendment (SNFPA) will be carried forward into the revised plans.

  Recommendation: The DEIS and Forest Plans should include language that clarifies the status of suitability for livestock grazing and specify that unless otherwise indicated, lands within currently established grazing allotments are considered to be suitable for livestock grazing. This includes both active and vacant allotments.
- We think a map of existing grazing allotments and their status (active or vacant) should be included in the DEIS. Proposed expansions of Wilderness or other specially designated areas should be displayed so as to disclose the potential impacts to current grazing allotments.

Recommendations: Include language in the Forest Plans that states the Forest Service's commitment to completing range allotment NEPA in a timely manner. Clarify in the DEIS that lands within existing grazing allotments have been determined to be suitable unless otherwise specifically identified through allotment planning and decision-making to be unsuitable. Specifically state in the DEIS that Appendix K from the 2004 SNFPA is to be incorporated into the revised Forest Plans. Include a map in the DEIS of existing active and vacant grazing allotments for each Forest.

Chapter 2 – Vision

The Vision chapter contains the desired conditions for various resources. The description of the desired condition should be modified as follows:

- Watershed Conditions. Page 9-11. WTR-FW-DC 01 states "Adequate quantity and timing of water flows support ecological structure and functions, . . ." The description of this desired condition needs to be expanded to include adequate quantity and timing of flows to support irrigation, agriculture, stock watering, and economic uses.

  Recommendation: Revise to read: "Adequate quantity and timing of water flows support irrigation, agriculture, stock watering, economic uses, ecological structure and functions, . . ." The failure to do so is contrary to the Multiple-Use Sustained-Yield Act and to the NFMA regulations requiring that plans address multiple uses.
- WTR-FW-DC 05 states that "Water quality meets the need of water users…" Water users depend on both water quality and water quantity.

  Recommendation: Amend the desired condition to read "Water quality and quantity meet the need of water users."
- Range. Page 40-41. RANG-FW-DC 01. The first and primary desired condition does not recognize the social and economic benefits of rangelands and emphasizes "biological diversity and ecological processes."

Recommendation: Revise the desired condition to read – "Rangelands, along with grazable forestlands and woodlands, provide large areas of contiguous space supporting native vegetation that has the potential to be grazed by domestic livestock. These ranges sustain family owned businesses and rural economies, biological diversity and ecological processes, and help to preserve the rural landscape and cultural heritage and social fabric of the central, southern and eastern Sierra Nevada."

- RANG-FW-DC 02. The second desired condition is also one-dimensional focusing on species diversity and plant communities and should be revised to recognize the fuel reduction benefits of livestock grazing and its social and economic benefits.

  Recommendation: Please revise to read - "Domestic livestock grazing supports the social and economic conditions of rural economies, is an important tool to help reduce fine fuels and provide sunlight for the growth of desired vegetation, and maintains the desired vegetation represented by diverse plant functional groups, species richness and diversity, and structure and condition of plant communities."

- RANG-FW-DC 05.

  Recommendation: Add the desired condition - "Maintain or increase livestock grazing to better use the suitable grazing capacity on the forest to achieve the other desired Range conditions."

Chapter 3 - Management Strategy

Management Areas

- Strategic Fire Management Zones. This section has numerous standards, guidelines, and goals for fire management zones, none of which recognize livestock grazing as a tool for fuel reduction. For example, Goal MA-GWPZ-GOAL 02, page 51 does not recognize the value of grazing in managing fuels.

  Recommendation: Amend Goal MA-GWPZ-GOAL 02 to read: "Reduce the threat of wildfire spreading to communities through fuel reduction treatments, livestock grazing, prescribed fire and wildfires managed to meet resource objectives, while also reducing risk to natural resources."

- Wilderness. This management area states the activities that are not suitable in wilderness. (Page 54)

  Recommendation: Clarify that existing livestock grazing is suitable in wilderness.

- Riparian Conservation Areas. As discussed in the WRLC multi-resource comments, (California Farm Bureau Federation is a joint commenter) we strongly believe that the Riparian Conservation Areas should be determined based upon the site-specific conditions rather than using a one-size-fits-all buffer.

  Recommendation: Modify Resource Conservation Area definitions to be based on site specific conditions instead of a set distance.

- Standard MA-RCA-STD 17, page 63, requires removal of livestock "from any area of an allotment when browsing indicates a change in livestock preference from grazing herbaceous vegetation to browsing woody riparian vegetation." The use of the term "any" is too expansive and unworkable. The standard should provide for other mitigation measures besides livestock removal including the use of temporary fencing or additional

herding. Also it creates too much of a judgment call about when livestock preferences have changed and is a standard that could be unfairly applied by an inexperienced range conservationist.

Recommendation: Modify this standard allow for other management measures.

- Guideline MA-RCA-GDL 07, page 64, provides that "During permit reissuance for livestock, evaluate impacts of facilities on the riparian conservation areas and, consider relocating existing livestock facilities outside of meadows and riparian areas." This guideline should be carefully applied since moving a watering trough outside the riparian areas with pipes often leads to broken pipes and then the livestock do not use the water troughs at all and are back drinking in the streams.

  Recommendation: Consider revising this guideline to provide sufficient flexibility to allow for a site-specific decision to leave an existing livestock watering trough within the riparian areas exactly where it is.

Goals

- Range. Add a new forest wide range goal at RANG-FW-GOAL 05, page 83, *Recommendation: Add the goal, "Expand livestock grazing to make use of underutilized capacity."*

Potential Management Approaches

- Range. The management approach on page 89, inflexibly requires reduction or elimination of livestock use and states – "Measures like salting, herding, water development, fencing and riding will be used whenever the opportunity exists to improve livestock distribution and minimize impacts to riparian areas. If mitigation is unsuccessful in preventing resource damage to riparian habitat, measures will be taken to reduce or eliminate livestock use in affected areas."
  There is no indication that the Forest Service should discuss the concern with the permittee and explore whether other mitigation measures that have not been tried are available and effective.

  Recommendation: Revise the paragraph to read: "Measures like salting, herding, water development, fencing and riding will be used whenever the opportunity exists to improve livestock distribution and minimize impacts to riparian areas. If mitigation is unsuccessful in preventing resource damage to riparian habitat, communicate with the permittee to address the problem, explore whether other mitigation measures that have not been tried are available and effective, and as a last resort take measures to reduce or eliminate livestock use in affected areas."

Chapter 4 - Design Criteria

Guidelines

- Range. Guideline RANG-FW-GDL 03, page 103, states that "domestic livestock should be managed to meet wildlife needs in identified important wildlife habitat areas." This guideline should be eliminated because nowhere does the plan define "important wildlife habitat areas" and the guideline will be subject to abuse and used to curtail grazing because plaintiffs will argue that all acres are "important wildlife habitat areas."

The selection of key areas for monitoring should be done in cooperation with the permittee which is not required under the current version of Guideline RANG-FW-GDL 04, page 103.

Recommendation: Modify the guideline to read: "In cooperation with the permittee, select a minimum of one key area benchmark for each sub-unit or pasture within an allotment that serves as the basis for establishing standards across the entire sub-unit or pasture on that landscape type. At selected key area benchmarks, include apparent trend rating, condition rating of soils, and a photo point record."

Forest Management

Forest management is essential to keeping forests in California healthy. Maintaining our forests generates economic activity and is an effective and necessary tool for preventing catastrophic wildfire. Currently, National Forests in California are overly dense with vegetation resulting in missed economic opportunity and increased risk to the public and environment. The opportunity to generate productive economic activity while improving forest health is being missed, while both our forests and our rural economies lose out.

Between 1994-2006, four mills in California closed and the Sierra Forest Products mill at Terra Bella reduced from a double shift to a single shift resulting in loss of important sawmill infrastructure, over 900 direct jobs, over 2,000 indirect jobs and $112 million in lost payroll.

The DEIS is void of any discussion regarding California's declining biomass power plant capacity. California's National Forests are carrying a large amount of wood waste from wildfire, insect and disease, and timber harvest. Without these power plants, this wood waste will have to piled and burned.

Prescribed fire can be another important tool for proper forest management. However, it is unclear how the USFS intends to increase prescribed burning levels when all forests within Forest Service Region 5 currently have large acres of prescribed burning backlog. Additionally, the amount of dead fuel that's been added by insect and disease are also factors to consider.

Recommendation: The DEIS and draft Forest Plans should be revised to discuss the current status of the biomass power plant industry.

Timber Sales

The DEIS and forest plans do not quantify the standing timber inventory, age classes, growth and mortality for the forests. It is impossible to determine whether the proposed timber sale levels are high enough to capture annual mortality or to prevent continued overstocking caused by net growth outpacing harvest. The failure to include quantifiable resource information about range and timber resources in the forest plans fails to fully inform the decision-maker and the public regarding current resource conditions and possible cumulative effects.

Alternative B, or the "preferred alternative" is not sufficient in adequately managing the forest. Additionally, the Alternative B planned timber sale program is not sufficient to maintain the sawmill at Terra Bella. Alternative D provides double the pace and scale included in Alternative B and increases post-fire salvage and reforestation. Additionally, Alternative D does not include diameter limits. While Alternative D could double thinning, there would not be a timber sale program increase resulting in no increase of wood supplies to sustain sawmill infrastructure.

Recommendation: The DEIS and draft plans should be revised to include the history of sawmill infrastructure and the associated consequences of lost sawmilling capacity, jobs and annual payroll since the beginning of the current forest plans.

Timber Harvest

We are also specifically concerned with the 27" diameter limit for pine and 30" diameter limit for all other species. It will also be impossible for the Forest Service to meet desired vegetative conditions with a diameter limit. We do not believe there is a scientific basis supporting such proposed limits. For these reasons, we are not supportive of Alternative C.

In regards to the California spotted owl, it appears these documents are even more restrictive than the 2004 SNFPA. Both the Sierra and Sequoia National Forest draft Forest Plans discuss limiting mechanical treatments to no more than 1/3 of individual activity centers. These restrictions will result in uneconomic timber projects on otherwise productive forest land. The result will be no increase in pace and scale of forest health and very necessary fuels reduction.

The draft Forest Plans for the Sierra and the Sequoia National Forests also limit mechanical treatment to 13% of all target cells for the Pacific fisher within a 10-year period. This limitation creates a constraint where the goal to treat all productive forest land over the next 10-15 years will not be achieved.

Recommendation: The DEIS and draft plans should be revised to include the Annual Timber Harvest from the Inyo, Sierra and Sequoia National forests during the life of the existing Forest Plans. The DEIS should also be amended to exclude arbitrary diameter limits that are not scientifically supported.

Wilderness Designation

The history of wilderness designation has repeatedly demonstrated that federal land management agencies invariably reduce and restrict grazing rights in wilderness areas, despite existing statutory protections intended to protect those grazing rights. These restrictions on grazing in wilderness areas inevitably result in severe revenue loss to impacted ranchers, reduced private property values, and negative economic impacts to nearby rural communities. Even if grazing continues to be allowed under designation, often management tools are substantially restricted.

There are a number of factors that tend to diminish grazing in wilderness areas despite apparent statutory protections for grazing:

1. Bureaucratic restrictions on access and road maintenance tend to increase the difficulty of managing grazing within wilderness areas.
2. Grazing permits on allotments within wilderness areas tend to be subject to more regulation and restriction than typical federal grazing permits, despite the protections offered in statute.
3. If grazing permits are allowed to expire (or are allowed to be purchased for uses other than grazing) on allotments within wilderness areas, they cannot be renewed for grazing purposes.

Therefore, wilderness designation that prevents the economic development of land that has resource value is not preferred. Should the Forest Service choose to move forward with land

designations, land currently utilized for livestock grazing and other beneficial multiple uses should be avoided or excluded.

Specific to the Inyo National Forest, additional wilderness designation in current and historic grazing areas on the east side of Monache Meadows are proposed in Alternative C (page 607). Reductions in grazing opportunities are significant to the local economy because agriculture is the second highest contributing factor.

To further illustrate these points, a recent Fresno Bee article discusses the designation of 1.3 million acres of the Sierra National Forest as a national monument under the Antiquities Act (George 2016). This proposal illustrates our concerns about the limitations such designations place on valid uses of our National Forest land. Once again, both the elimination of commercial logging and phase out of livestock grazing are both included in the designation proposal.

Recommendation: Given these considerations, Alternative C in particular should be disfavored because of the significant impact of additional wilderness designations upon grazing, timber harvest and the local economy as recognized on page 593 of the DEIS. Reductions in grazing opportunities and elimination of commercial logging are significant to the local economy because agriculture is the second highest contributing factor.

Wild and Scenic River Designation

As with wilderness designations, wild and scenic river designations often result in the elimination or reduction of public lands grazing, either directly via changes in agency management resulting from the designation, or indirectly via litigation by third parties. Wild and scenic designations also threaten ranchers' ownership, use, and enjoyment of private property because designation provides the Secretary of the Interior broad discretion to condemn lands within Wild and Scenic River corridors. In addition, there are no imminent threats to these rivers that would impair their existing character.

Recommendation: Additional wild and scenic rivers should not be designated under the final plan because such designations have the effect of impairing the multiple use objective.

Species Management

We are concerned with the single species habitat management approaches for the California spotted owl, the Pacific fisher and Sierra marten. With the omission of wildfire, insect and disease throughout the DEIS and draft Forest Plans, the desired vegetative conditions designed to maintain viable populations of these species is not realistic.

From a livestock grazing perspective, the concern is not with which species are included in the DEIS and draft Forest Plans but rather with the habitat management that occurs as a result of inclusion. The Forest Service should not curtail permitted livestock grazing when managing habitat for included species. Rather, the Forest Service should recognize the significant benefits that grazing and ranch management bestow upon the habitat of many species. For example, grazing can benefit the California spotted owl by reducing fire fuels and providing access to forest-floor prey, and invasive species management accomplished through grazing benefits species such as the Greater sage-grouse. Livestock grazing should be actively promoted as a habitat-improvement tool.

Yosemite toad

We are disappointed to see that the Sierra Forest has carried over the SNFPA standards for Yosemite toads and livestock grazing despite best available science. (Roche et al). We support moving toward a more adaptive approach, rather than the current intensive and prohibitively costly approach which requires "systematically monitoring a sample of occupied Yosemite toad sites (minimum of one location per allotment) within a meadow to assess habitat conditions and assess Yosemite toad occupancy and population dynamics" which may or may not be related to current livestock grazing management.

Given that the Forest has been unable to move forward in the last 12 years under the current plan with development of site specific grazing plans to allow livestock grazing to occur in Yosemite toad habitat, it is unlikely they will be able to do so in the future with anticipated funding and staffing levels.

While we have been advised that the predictive model approach in Alternative D will allow more opportunities for continued livestock grazing in Yosemite toad habitat areas that have been historically grazed by livestock, there is not enough information in the DEIS as to how this would actually differ from current management or affect permittees. More detailed information as to how the model would be developed and applied is needed to comment on the Alternative D approach. We are concerned that this approach may actually expand potential habitat and restrictions beyond currently identified areas (outside the science base) and potentially have an even wider impact on current livestock grazing permittee operations.

Recommendation: Revise the current language in the draft Sierra Forest Plan to reflect best science (Roche et al, McIlroy et al) that indicates properly managed livestock grazing and amphibian conservation (habitat and animals) are compatible uses in Yosemite toad habitat. Provide more detailed information in Alternative D as to how the proposed approach would impact current livestock permits in Yosemite toad areas.

Great grey owl

We appreciate that management of Great grey owls has been carried over from the SNFPA as a guideline rather than a strict standard. However, there is ongoing concern regarding how protected activity centers (PACs) are delineated and at what point a PAC is no longer protected if the habitat changes due to climate change, fire or other environmental dynamics? We agree with a guideline to manage herbaceous vegetation according to site potential. What is the Regional guidance on determining potential prey species and associated habitat requirements that are referenced in the guideline?

Willow flycatcher

We agree with the determination that species-specific plan direction for willow flycatcher is not being carried forward into plan revision. Current direction includes survey requirements and livestock grazing direction for occupied sites. However, there is no overlap of occupied sites and livestock grazing; therefore, additional species-specific plan direction is not necessary.

Sage-grouse, Bighorn sheep and Golden trout

The Forest Service and livestock grazing permittees should be represented in interagency and cooperative working groups to manage species of concern such as Sage-grouse, Golden trout and Sierra Nevada bighorn sheep (Inyo National Forest).

Water Supply

Forests in California provide all Californians with an abundant source of clean water. It is estimated that California's National Forests store and filter more than 60% of the state's water supply. Therefore, the management of National Forests has a meaningful effect on water supply. If National Forests aren't managed to reduce overgrowth and susceptibility to intense fire, insects and disease, the draft Forest plans will fail to support the objective of increasing water supply for which the National Forests were established. Wildfire on National Forest lands exposes the soil to erosion, carrying sediment into much needed reservoirs, and eliminating precious water storage capacity in a time of severe, ongoing drought.

Important work by John Battles of University of California, Berkeley and Roger Bales and Martha Conklin of University of California, Merced, among others, as part of the ongoing interdisciplinary, multi-agency Sierra Adaptive Management Project (SNAMP), has demonstrated the potential for significant gains by reducing evapotranspiration and increased runoff through the use of Strategically Placed Landscape Treatments (SPLATS).
In addition, this same work has demonstrated that the combination of mechanical thinning, prescribed fire, and other forest fuel reduction treatments can significantly improve forest health, including increased resilience to high-intensity fire. To meaningfully realize these benefits on our National Forests, we must implement aggressive and sustained active management at a landscape scale. Instead, the draft Forest Plans propose only very low levels of ongoing active management, and then only very limited areas.

By establishing a responsible level of continuous fuels reduction that includes a combination of robust mechanical thinning and prescribed fire, excessive evapotranspiration, tree stress, disease and infestation could be significantly reduced, health forest conditions preserved, and species and habitats protected. Instead, the downward, accelerating spiral of fuel accumulation, ongoing drought, and disease and infestation will lead, inevitably, to high-intensity fire events in future. When these events occur, all values of the National Forest will be lost.

As the SNAMP studies show, active forest management on a landscape scale can help to mitigate the adverse effects of rapidly evolving climatic conditions and dwindling statewide water supplies. Such responsible management is not only compatible, but actually promotes many of aforementioned Desired Conditions. However, this cannot occur without a major shift away from the current approach; and the current approach cannot change if we continue to view our National Forest land as static landscapes. Ensuring we do not miss this critically important opportunity in these Forest Plans is especially important.

Recommendation: Currently, the DEIS and plans do not take into account the significant impact that wildfire, insect and disease has on water quality and water supply. The document should be revised to include these factors. Additionally, the draft forest plans should be revised to improve the water supply provided by the National Forests through the following:

- *Vegetation management which will improve forest health and lead to increased water supply by reducing demand from overly dense tree cover*
- *Include improved water supply as an objective of meadow restoration and other projects*
- *Allow construction of small-scale off stream and other reservoirs on National Forests to increase water supply*

The Farm Bureau Coalition appreciates the opportunity to comment on the DEIS, draft Forest Plans and accompanying documents. If questions, please contact Erin Huston (ehuston@cfbf.com) or Jack Rice (jrice@cfbf.com).

Sincerely,

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Mariposa County Farm Bureau
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Modoc County Farm Bureau
Sanguinetti Cattle Ranch
Shasta County Farm Bureau
Stanislaus NF Grazing Permittee Assoc.
Tuolumne County Farm Bureau
Tulare County Farm Bureau

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