

Range Issues

Washington Cattleman's Association
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Range Issue 1. The ARCS-mod standards and guidelines impose unreasonable restrictions and are not needed 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.

Response:

Relevant direction in the revised LMP a guideline that allows flexibility and site specific information to be used to enable attainment and maintenance of desired conditions, including riparian conditions, MA-GDL-RMA-11. Annual Grazing Use indicators (revised LMP, pp. 126-128).

The FEIS states, "*The 1988 forest plan includes riparian management direction from the Inland Native Fish Strategy (INFISH, USDA Forest Service 1994 and 1995). This approach appears to have either maintained or improved riparian and aquatic habitat conditions at the watershed and larger scales.*" (FEIS, Vol. I, pp. 227, 649).

There are other statements within the document that while not necessarily inconsistent with this statement, provide a broader perspective of the riparian and aquatic habitat conditions (FEIS, Vol. I, pp. 15, 31, 192, 193, 218, 278, 285, and 384; FEIS, Vol. II, pp. 533, 534, and 664; FEIS, Vol. III, pp. 1045, and 1346).

The draft ROD selects Alternative P (DROD, pp. 7) which includes the *Colville ARCS* (DROD, pp. 8, FEIS, Vol. III, pp. 1347). The *ARCS-modified* was included in both Alternatives R and P in the draft EIS but is only part of Alternative R in the final EIS, and is therefore not included in the revised LMP to which this objection applies. The revised LMP and analysis citations above and the discussion below refer to the grazing related portions of the *Colville ARCS* which is part of the revised LMP.

I find the revised LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue with one possible exception. FSH 1909.12 (23.23d) states, "Allotment management plans for livestock, and territory management plans for wild horse and burro populations provide specific operational guidance and are the most appropriate planning level to carry out management tools such as minimum stubble height, multiple-year mean utilization, or streambank alteration limitations." While FSH 1909.12 provides policy for implementation of the 2012 planning rule and the Colville Plan revision was conducted under the 1982 planning rule I believe the policy for appropriate levels where site specific grazing standards and guideline are appropriate transcend which planning rule we are operating under and rather reflects that we should not have applied site specific S&Gs under the 1982 planning rule. Although MA-GDL-RMA-11 provides ranges of limitations for stubble height, herbaceous utilization, streambank alteration and woody browse, flexibility in application has been incorporated into the guideline and therefore appears to meet the intent of the cited handbook direction.

While the analysis states the current "... approach appears to have either maintained or improved riparian and aquatic habitat conditions at the watershed and larger scales." The analysis also provides a broader context that riparian habitats/zones display variable conditions across the forest and many are in less than

desired condition. The analysis indicates between draft and final several changes were made (resulting in the MA-GDL-RMA-11 guideline of Alternative P, also a part of Colville ARCS) which were specifically adopted to provide greater flexibility to adapt annual grazing indicators to match specific site characteristics. Although the determination of whether the grazing restrictions associated with the guideline are “unreasonable” is subjective, the flexibility built into the guideline to accommodate site characteristics distance it from the “unreasonableness” threshold. The analysis consistently determines the grazing related portions of the Colville ARCS will contribute to movement towards desired riparian conditions.

Range Issue 2. The stubble height requirement is too restrictive and limits adaptability. For example, does not allow for site specific conditions, such as places where 4-inches is not attainable, or research that shows 2.75 inches is adequate. Riparian area components are too prescriptive and restrictive vs. grazing should be completely eliminated in riparian areas to restore degraded habitats. Stubble height should be 6-inches.

Response:

I find that the revised LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue. FSH 1909.12 (23.23d) states, “Allotment management plans for livestock, and territory management plans for wild horse and burro populations provide specific operational guidance and are the most appropriate planning level to carry out management tools such as minimum stubble height, multiple-year mean utilization, or streambank alteration limitations.” Although MA-GDL-RMA-11 provides ranges of limitations for stubble height, herbaceous utilization, streambank alteration and woody browse, flexibility in application has been incorporated into the guideline and therefore appears to meet the intent of the cited handbook direction.

The analysis indicates that between draft and final several changes were made (resulting in the MA-GDL-RMA-11 guideline of Alternative P, also a part of Colville ARCS) which were specifically adopted to provide greater flexibility to adapt annual grazing indicators to match specific site characteristics. Although the determination of whether the grazing guidelines are “too restrictive” is clearly subjective, the flexibility built into the guideline to accommodate site characteristics appear to distance it from the “too restrictive” threshold.

MA-STD-RMA-09 indicates, “[w]here livestock grazing is found to prevent or retard attainment of aquatic and riparian desired conditions, modify grazing management. If adjusting practices is not effective, remove livestock from that area using appropriate administrative authorities and procedures.” This standard provides an intermediate stage of apparently discretionary duration where grazing management can be modified if it is found to prevent or retard attainment of aquatic and riparian desired conditions.

Range Issue 3. MA-STD-RMA-01-Standard is too vague, but contains “shall” language indicating the standard will be strictly enforced. MA-STD-RMA-09 lacks clarity, but could result in the removal of livestock from the forest.

Response:

I find that the proposed LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

When MA-STD-RMA-01 and MA-STD-RMA-09 are read in the context of: the whole of the Riparian Management Area direction, the Colville ARCS, or even the grazing related desired conditions, objectives, standards and guideline it makes the meaning and intent of the two individual standards clearer. The potential for the Riparian Management Area direction to impact the level of livestock grazing in terms of time, labor, capital investments and risk of being in noncompliance was discussed within the analysis. Changes to Alternative P were made between draft and final in an effort to reduce that impact while meeting riparian management objectives. However, it may be wise to reconsider whether the agency wants to use the term “shall” or “should” in MA-STD-RMA-01 as one does provide more stringent limitation on subsequent decision space than the other.

Range Issue 4. Recommended wilderness, designation of backcountry areas and increased fire frequency will increase costs of livestock grazing.

Response:

I find that the proposed LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

The analysis acknowledged, “[p]ermit holders for allotments with less motorized access may take more time and labor to observe stock, check fences and water developments, and distribute salt than allotments with motorized off-highway vehicle access.” The primary agency policy statement relative to this issue is found at FSM 2323.22 Exhibit 01 labeled Congressional Grazing Guidelines, and states in part, “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. . . . Where practical alternatives do not exist, maintenance or other activities may be accomplished through the occasional use of motorized equipment. This may include, for example, the use of backhoes to maintain stock ponds, pickup trucks for major fence repairs, or specialized equipment to repair stock watering facilities. Such occasional use of motorized equipment should be expressly authorized in the grazing permits for the area involved. The use of motorized equipment should be based on a rule of practical necessity and reasonableness. . . . Moreover, under the rule of reasonableness, occasional use of motorized equipment should be permitted where practical alternatives are not available and such use would not have a significant adverse impact on the natural environment.” There is no indication in the analysis there is a violation of the rule of reasonableness described under this policy statement.

Range Issue 5. The Watershed Condition Framework creates a new model for range monitoring. The model raises issues with new grazing standards, and such standards will make it difficult or impossible for ranchers to successfully graze on federal lands.

Response:

I find that the proposed LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

Between Draft and Final the deciding officer instituted a change where the Watershed Condition Framework (WCF) was no longer, “the driver in establishing existing condition.” However, under the proposed decision the WCF is intended to provide information to, “be used as part of the evaluation with

other specific, local information that will also play a prominent role in establishing existing condition for a specific site.” This appears to have effectively remedied the objection.

Range Issue 6. The FEIS livestock related climate change analysis lacks scientific integrity.

Response:

I find that the proposed LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

Most popularly referenced articles considering domestic livestock and climate change/green-house gas emissions have a basis in highly concentrated feedlot livestock production systems. The analysis for the Colville revised LMP presents citations far more relevant to extensive rangeland livestock production systems. This usage of the literature is consistent with other analyses in the eastern forests of Region 6.

Range Issue 7. The FEIS doesn’t adequately analyze or disclose grazing impacts related to: noxious weed spread, soil damage, upland and riparian vegetation changes, changes in fire behavior, expected annual cost of infrastructure maintenance and installation, and impacts on wildlife.

Relevant direction in the Proposed LMP:

- Invasive species: “FW-STD-IS-01. Invasive Plant Prevention (revised LMP, pp. 69) – This is a forest-wide standard and applies to grazing.
- Soils: “FW-DC-SOIL-02. Detrimental Soil Conditions and FW-DC-SOIL-03. Soil Stability (revised LMP, pp. 31)

Relevant Analysis in the FEIS:

Invasive Species – The FEIS addressed invasive species and the effects of grazing (FEIS, Vol. I, pp. 180, 182, and 190).

Soil – The FEIS addressed soils and effects of grazing (FEIS, Vol. I, pp. 416, 417, and 426).

Vegetation – The FEIS addressed upland and riparian vegetation and effects of grazing (FEIS, Vol. I, pp. 91, 134, 137, 138, 141, 142, 144, 145, 234, and 278)

Fire – The FEIS addressed fire behavior and the effects of grazing (FEIS, Vol. II, pp. 1035

Infrastructure costs – The FEIS addressed effects costs of infrastructure maintenance and installation related to grazing (FEIS, Vol. II, pp. 654 and 1077).

Wildlife – The FEIS addressed wildlife and effects of grazing (FEIS, Vol. II, pp. 450, 524, 525, 533, 540, 542, and 1078)

Response:

I find that the proposed LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

I did find the analysis did not include the effects of grazing on fuel levels and fire severity because of the short-term nature (typically less than 1 year) of grazing effects on reducing levels of fine fuels. While allotments and pasture locations are known, the timing and rotation of livestock around the allotment varies, and precipitation can affect re-sprouting of grass or other vegetation grazed by livestock in a given year. The analysis instead focused on long-term, ecological changes to the forest. When looking at large fires (over 100 acres) from 1944 and earlier, total acreage burned by large fires was 901,900 acres, with a total of 91 large fires. From the time period of 1944-2015, total acreage burned by large fires was 158,700 acres, with a total of 38 large fires.” (FEIS 1035)

The only reference to grazing effects on fire that I was able to find was in the Heritage Resources section of the FEIS, was very indirect, and could be misconstrued to support one objector’s contention that, , “scientific evidence exists suggesting long term grazing within many western forests contributes to unintended negative consequences relative to fire and forest health”. This position is generally based upon a paper by Belsky and Blumenthal publish in 1997 entitled, Effects of Livestock Grazing on Stand Dynamics and Soils in Upland Forests of the Interior West. Many of the issues raised by this paper were addressed by a paper by Borman published in 2004 entitled, Forest Stand Dynamics and Livestock Grazing in Historical Context. Neither paper was cited by objectors or within the analysis for the LMP.

Response to comments between Draft and Final indicate that grazing effects relative to fire were intentionally not included because of the ephemeral nature of the effect and because of the variability of both the effect and its spatial arrangement on the landscape. Otherwise the coverage of the effects of grazing appears to be adequate within the FEIS.

Range Issue 8. The FEIS does not adequately disclose the amount of direct, indirect or cumulative effects regarding site-specific damage caused by cattle grazing within the cumulative effects area on state, private and national forest grounds.

Relevant direction in the Proposed LMP:

“The revised land management plan only designates management areas as suitable or not suitable for grazing, consistent with the 1982 Planning Rule. All other grazing decisions will continue to be made at the allotment level.” (DROD 15)

Relevant Analysis in the FEIS:

“This programmatic analysis does not analyze changes that may occur to livestock management at an allotment level. Instead, project-level analysis would be completed independent of this planning effort at the allotment level to determine the appropriate intensity, timing, and duration of livestock use.” (FEIS 650)

Response above includes citations to the record that include direct, indirect and cumulative effects.

Response:

I find that the revised LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

The revised LMP does not authorize projects or activities (36 CFR 219.2) including livestock grazing. The agency is to, “[d]esign plan components to accommodate the range of site-specific needs of individual areas, species, allotments, and plant communities. Allotment management plans for livestock,

and territory management plans for wild horse and burro populations provide specific operational guidance and are the most appropriate planning level to carry out management tools such as minimum stubble height, multiple-year mean utilization, or streambank alteration limitations.” While this level of planning is adequate to discuss general effects at the Forest scale, the project planning level is the appropriate level to discuss site specific effects of livestock grazing.

Range Issue 9. The Forest Service did not conduct a thorough and scientifically based suitability and capability determination. In addition, there are no standards in the LMP that direct such a determination be undertaken at the allotment-specific level. Range capability guidance suggests that lands incapable of producing 200 lbs/acre/year of be removed from consideration from grazing. The CNF altered this standard to 50 lbs./acre/year. This alteration is arbitrary and capricious. The suitability analysis is incorrect. Suitability and Capability were determined without monitoring data.

Relevant Analysis in the FEIS:

“The methods for determining acres of land capable and suitable for livestock grazing are described in detail in appendices A and B of the Range Specialist Report and appendix G of this FEIS. The boundary for the suitability analysis contains all NFS lands within the boundaries of the Colville National Forest.” (FEIS 651)

Response:

I find that the revised LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

The FEIS uses the standard capability and suitability analysis from Region 6 (titled Rangeland Suitability for Livestock Grazing at the Forest Plan Level and Standards for NEPA Display (Rev. 3/6/03)(white paper)) which has been conducted for most Forest Plan Revision and Allotment Management Planning analyses in the Region since the mid to late 1990s (there was an earlier dated version of this white paper).

In reviewing this analysis there was one irregularity that must be noted as represented below:

“Range capability guidance suggests that lands incapable of producing 200 lbs./acre/year of forage be removed next. Because much of the potential forage resource occurs on transitory range in holes in the forest canopy, the team believed that this standard was inappropriately high. In such situations, levels of forage production are unlikely to reach the specified level on an acreage basis because, due to dense tree cover, up to 75 percent of an acre may produce little forage. A threshold of 50 lbs./acre/year is used instead. Within the soil resource coverages for the Forest, lands classified as shallow soils were removed from consideration at this stage because of inherent productivity limitations.” (FEIS 1334)

This is a misuse/misunderstanding of the procedure included in the document titled Rangeland Suitability for Livestock Grazing at the Forest Plan Level and Standards for NEPA Display (Rev. 3/6/03). This misuse/misunderstanding is in part due to the wording of the instructions in the white paper that could be construed to be contrary to its intended usage. The quoted statement is contradictory. The guide states that lands **that are incapable** of producing 200 lb./acre/year of forage be removed, the subsequent statement in the FEIS indicates disagreement with the threshold because they have much transitory range that isn’t currently producing 200 lb/acre/year because of tree canopy cover, but if the transitory range

was managed to desired condition it would produce more forage. When these lands are managed to desired condition it is capable of producing more than 200 lb./acre/year (then it should not have been removed from consideration per the directions in the white paper). However, the process description in the white paper states, “ 3. Subtract soil types that are not inherently capable of producing more than 200 pounds of forage/acre within their Potential Natural Community [(PNC)] (such as badland outcrops or alkali salt flats).” Use of PNC as the criteria in the process for determination of threshold may be where the misapplication of this criteria occurred. The intended application of this “screen” in the white paper is to remove all plant associations or potential natural communities that (according to plant association guides) will not produce 200 lb/acre/year of forage at maximum forage production (most plant association guides provide a range). Removal of any forested acreage with potential to produce over 200 lb/acre/year of forage is only intended to occur in the suitability analysis. However, it should be noted the resultant misuse/misapplication of the white paper and adjustment of threshold may have resulted in very similar results.

Range Issue 10. Neither the FEIS nor the plan discuss/disclose the FS methodology or rationale for determining the number of capable acres within the planning area for grazing, nor do they provide data to justify determination. Without detailed explanations of the agency’s process for determining grazing capability the FEIS and Plans do not satisfy NEPA and NFMA.

Relevant Analysis in the FEIS:

“The methods for determining acres of land capable and suitable for livestock grazing are described in detail in appendices A and B of the Range Specialist Report and appendix G of this FEIS. The boundary for the suitability analysis contains all NFS lands within the boundaries of the Colville National Forest.” (FEIS, Vol. II, pp. 651)

Appendix G Part VI-Rangeland Analysis (FEIS, Vol. III, pp. 1333-1344) provides a detailed description of the Range Capability and Suitability Analysis.

Response:

I find that the proposed LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

The analysis (FEIS, Vol. III, Appendix G, pp. 1333-1344) provided an extensive and detailed description of the methodology used for determining range capability and suitability.

Range Issue 11. Desired conditions have replaced measureable and quantitative INFISH standards.

Relevant direction in the Proposed LMP:

“My decision includes a modified version of the greenline vegetation guideline that was included in the draft land management plan. The original guideline included indicators for streambank alteration, utilization of woody vegetation, and stubble height in the riparian area. The guideline has been modified based on comments received from the public, and is now called MA-GDLRMA-11. Annual Grazing Use Indicators. Specifically, this guideline is intended to provide more current, consistent, and objective grazing management across the Forest based on best available science; and to maintain or improve

riparian vegetative and stream conditions, thereby improving the viability of Regional Forester sensitive aquatic species, contributing to the recovery of ESA listed species, and facilitating the attainment of State water quality standards over the long-term. By including this modified guideline in the final revised land management plan, I have determined that positive trends in watershed health established by management under the INFISH amendment will persist, while ensuring continued, viable livestock use on the Colville NF.” (DROD 11)

Relevant Analysis in the FEIS:

In the response to comments (FEIS, Vol. III, pp. 1039):

“The final EIS and proposed revised forest plan for the Colville National Forest integrated the regional direction included in ARCS-2016, and produced a Colville National Forest Aquatic and Riparian Conservation Strategy, included as appendix H to the FEIS. The Colville ARCS is a refinement of three existing strategies; the Northwest Forest Plan, Interim Strategies for Managing Anadromous Fish-Producing Watersheds in Eastern Oregon, Washington, Idaho, and portions of California (PACFISH), and the Inland Native Fish Strategy (INFISH) developed by the Forest Service Region 6 Office to guide forest plan revisions across the region. Background for the Colville ARCS used by the Forest is in FEIS appendix H.

The ARCS was modified for alternative P in the draft forest plan based on public and internal comments on the original ARCS (2008a) included in the proposed action, best available science, and new policies on Forest Service management of aquatic and riparian resources, including the National Water Quality Best Management Practices Program, and the National Watershed Condition Framework. The ARCS included in alternative P and in the proposed revised forest plan was further refined based on a 2016 update to ARCS at the regional-level. The regional document is available in the project record.

The Colville ARCS components were also developed based upon the operational experience gained through implementation of the Northwest Forest Plan, PACFISH and INFISH. The operational considerations for the components of the Colville ARCS, including each standard and guide were discussed at length by the Forest and Regional Office staffs before they were included in both the draft and final plans. A crosswalk between the ARCS components proposed for the alternatives (including the no action alternative and alternative B which are based on INFISH) is located in FEIS appendix H. The intent of all INFISH standards and guidelines are carried-through into the Colville ARCS, however, wording of standards and guidelines have been updated based on over 15 years of INFISH implementation and new science since the INFISH amendment. The proposed revised forest plan also includes a desired condition specifying a goal to have the ever-changing distribution of stream conditions in watersheds across NFS lands to be similar to the dynamic distribution of conditions in reference watersheds (that is, those that have been the least affected by past management activities). This contrasts with PACFISH and INFISH, which established relatively uniform and static Riparian Management Objectives (RMOs) as interim targets for management. Besides more completely specifying management goals through additional desired conditions, ARCS more explicitly defines the spatial scale(s) over which the desired conditions apply than do the existing strategies. ...”

In addition, Appendix H. Aquatic and Riparian Conservation Strategies describes the ARCS (FEIS, Vol. III, pp. 1345-1455)

Response:

I find that the revised LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

The analysis adequately describes how the selected alternative is superior to incorporation of INFISH only.

Range Issue 12. The FEIS did not adequately assess the capacity of the FS to manage the grazing program and to adjust the scope of the grazing program to reflect reality.

Relevant direction in the Proposed LMP:

“IMPLEMENTATION CHALLENGES

“A final challenge is maintaining relevancy of the national forests to the American people. Our success in achieving desired conditions depends on recognizing these challenges, some of which may be beyond our management capability, such as uncertainties around climate change, unforeseen environmental disturbances, and budgetary fluctuations. These challenges may mean it will take longer and more work to achieve the desired conditions. Congress allocates the Forest Service budgets on an annual basis, which may or may not be sufficient to implement proposed annual activities or meet desired conditions.”
(revised LMP, pp. 7)

Response:

I find that the proposed LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

While 36 CFR 219.1(g) states that, “(g) The responsible official shall ensure that the planning process, plan components, and other plan content are within Forest Service authority, the inherent capability of the plan area, and the fiscal capability of the unit.”, FSH 1909.12, 21.2 states, “The Responsible Official should consider this list of resources and issues before developing a proposed new plan or revised plan or as part of the process of developing the proposed plan.” Capacity to manage the grazing program is directly correlated to the budget provided by Congress.

Range Issue 13. In the case of the FEIS, the FS fails to analyze any alternative that contain interim standards or actual changes to grazing management in the near term. This is a violation of NEPA.

Relevant direction in the Proposed LMP:

Application to projects or activities authorized after Plan decision

Direction in revised land management plan will apply to all projects that have decisions made on or after the implementation date of the final ROD. All projects and activities authorized by the Forest Service after approval of the revised land management plan, subject to valid existing rights, must be consistent with the revised land management plan. All subsequent project or activity approval documents will describe how the project or activity is consistent with the land management plan using the criteria identified in the revised land management plan (see Consistency with Plan Components, revised LMP, pp 12-16).

Application to projects or activities authorized before Plan decision

All ongoing Forest projects and activities shall be revised to be consistent with the revised land management plan as soon as practicable, subject to valid existing rights (16 U.S.C. 1604(i)) as follows:

Contracts, authorizations of occupancy and use, or other instruments subject to annual operating instructions or operating plans will be made consistent with all applicable revised land management plan direction through the annual operating instructions or annual operating plan during the operating season after the final ROD for the revised land management plan is signed. Exceptions to this requirement include where the revised land management plan states a timeline for consistency that is different than described in this paragraph. Additionally, where necessary for certain Forest uses, determination of conditions (water quality, aquatic habitat, and riparian vegetation), based upon best available information, will be completed within five years where ESA listed fish may be affected, and within seven years for all other areas.

- Contracts, authorizations of occupancy and use, or other instruments not subject to annual operating instructions that will expire within five years of the implementation date of the final ROD for the revised land management plan where federally listed species or habitat may be affected will be made consistent with revised land management plan direction within one year of the date the final ROD for the revised land management plan is signed. Where federally listed species or habitat is not affected, these activities will be made consistent upon renewal of the contract or authorization.
- Contracts, authorizations of occupancy and use, or other instruments that will expire more than five years after the implementation date of the final ROD will be made consistent with revised land management plan direction within five years of the implementation date where federally listed species or habitat may be affected. Where federally listed species are not affected, these activities will be made consistent with revised land management plan direction within seven years of implementation date.” (DROD, pp. 37)

Response:

While the preceding citations address the objection, relative to Term Grazing Permits, the following exert from the DROD,

“Contracts, authorizations of occupancy and use, or other instruments subject to annual operating instructions or operating plans will be made consistent with all applicable revised land management plan direction through the annual operating instructions or annual operating plan during the operating season after the final ROD for the revised land management plan is signed.”

is not consistent, as stated, with 36 CFR 222.4(a)(7) which was further validated by case law (ONDA v USFS 2006). Associated Term Grazing Permits must be modified, and incorporated Allotment Management Plans should be amended, prior to inclusion into Annual Operating Instructions.

Range Issue 14. The FEIS violates NEPA in terms of methodology, scientific accuracy, scientific integrity, and failure to properly analyze and disclose cumulative effects.

Response:

This range issue is so general as to be nearly impossible to test. The FEIS is 1496 pages long. The revised LMP is a much more manageable 236 pages long and the DROD is 38 pages. Word search and table of contents navigation is necessary in order to address all objection issues. One objector stated, “In 2016, the USDA published a study titled, [‘]Effects of Drought on Forests and Rangelands in the United States: A Comprehensive Science Synthesis[‘] (Vose et al., 2016) that includes information on the effects of drought on rangelands and adaptive strategies for managing livestock. According to the report, [‘]The most obvious and arguably the single most important strategy for adapting to drought is reduction in stocking rate because plants that have been overgrazed or cropped too frequently are less able to recover after drought (Hart and Carpenter 2005).[‘] [8-118]”

Range Issue 15. Grazing is an effective fire management tool vs. grazing has created a more fire prone forest, susceptible to mega-fires and should be eliminated.

Relevant Analysis in the FEIS:

“The aggressive fire suppression management practices prior to 1970, and livestock grazing resulted in changes to the forest structure. Over time, dead and down materials increasingly grew thicker on forest floors and the Forest became dense with stands of regenerated young trees.” (FEIS, Vol. II, pp. 637)

“Response: The analysis did not include the effects of grazing on fuel levels and fire severity because of the short-term nature (typically less than 1 year) of grazing effects on reducing levels of fine fuels. While allotments and pasture locations are known, the timing and rotation of livestock around the allotment varies, and precipitation can affect re-sprouting of grass or other vegetation grazed by livestock in a given year. The analysis instead focused on long-term, ecological changes to the forest. When looking at large fires (over 100 acres) from 1944 and earlier, total acreage burned by large fires was 901,900 acres, with a total of 91 large fires. From the time period of 1944-2015, total acreage burned by large fires was 158,700 acres, with a total of 38 large fires.” (FEIS, Vol. III, pp. 1035)

Response:

I find that the proposed LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

The FEIS response to comments (above) provide a justification for not including the effects of grazing on fuel levels and fire severity. A minimal reference (above) to historic grazing contributing to a more fire prone environment is in the Heritage resources section of the FEIS. Also see Range Issue 7.

Range Issue 16. The plan needs to contain objective, quantitative, measurable grazing standards. If a watershed does not meet certain measureable standards there should be a way to suspend grazing.

Relevant direction in the Proposed LMP:

MA-GDL-RMA-11. Annual Grazing Use Indicators (revised LMP, pp. 126)

MA-STD-RMA-09. Management of Livestock Grazing to Attain Desired Conditions (Revised LMP, pp. 122).

Relevant Analysis in the FEIS:

“Forest plan guideline MA-GDL-RMA-11 pertaining to annual grazing use indicators is more restrictive than direction contained in AMPs developed under the 1988 forest plan in regard to herbaceous and woody species utilization and residual greenline stubble height for some allotments. It is currently difficult to quantify all of the effects to permitted grazing for the listed indicator values of this guideline because of incomplete forestwide information at the allotment and pasture level. There is flexibility within this guideline which specifies that: (1) the values listed are starting points for management, (2) that only those indicators and numeric values that are appropriate to the site and necessary for maintaining or moving toward desired conditions should be applied, (3) that specific indicators and indicator values should be prescribed and adjusted, if needed, in a manner that reflects existing and natural conditions for the specific geo-climatic, hydrologic and vegetative setting in which they are being applied, (4) that indicators and indicator values should be adapted over time based on long-term monitoring and evaluation of conditions and trends, and (5) that alternative use and disturbance indicators and values, including those in current ESA consultation documents, may be used if they are based on best available science and monitoring data and meet the purpose of this guideline. Some potential effects to permitted grazing from this guideline could include changes to allotment management through increased livestock management, modification of salting locations, fencing, shorter grazing seasons, or reduced livestock numbers. Where allotment management changes are needed to comply with this forest plan guideline, grazing permittees could experience increased time requirements, increased labor requirements, and increased costs. This guideline, which is derived from the Colville ARCS, is more restrictive than direction contained in no action, alternative B, the proposed action, and alternative O, but is less restrictive than direction for alternative R.” (FEIS 664)

Response:

I find that the revised LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

MA-STD-RMA-09 includes provision for, “removal of livestock”, when modification of grazing management where livestock grazing has been found to prevent or retard attainment of aquatic and riparian desired conditions.

Range Issue 17. Factoring and modeling does not provide site specific information regarding suitability. Factoring is meaningless if livestock are allowed to gain access anywhere they can wander. Without standards and guidelines requiring annual monitoring of the variety of biological eco-zones where grazing DOES occur, there is no basis in the range model to guide allotment management.

Relevant Analysis in the FEIS:

“The methods for determining acres of land capable and suitable for livestock grazing are described in detail in appendices A and B of the Range Specialist Report and appendix G of this FEIS. The boundary for the suitability analysis contains all NFS lands within the boundaries of the Colville National Forest.” (FEIS, Vol. II, pp. 651)

Appendix G Part VI-Rangeland Analysis (FEIS, Vol. III, pp. 1333-1344) provides a detailed description of the Range Capability and Suitability Analysis.

Response:

I find that the proposed LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

Range suitability and capability were mapped (FEIS, Vol. III, pp. 1340-1343) for both cattle and sheep. By tying a determination for both suitability and capability to a geographic location site specificity was achieved. The purpose and function of capability and suitability analysis for grazing is described in detail in Appendix G, Part VI of the FEIS.

Range Issue 18. The FEIS fails to address the conclusions of conflicting science, such as "Grazing and trampling reduces the capacity of soils to sequester carbon, and through various processes contributes to greenhouse warming." (Beschta et al., 2012). (8-117)

Response:

I find that the proposed LMP and associated analysis is consistent with grazing related law, regulation and policy relative to this range summary issue.

Although the objector cites Beschta et al. 2012 and the FEIS (Vol. II, pp. 655) addresses Beschta et al. 2013, both citations are referring to the article titled, *Adapting to Climate Change on Western Public Lands: Addressing the Ecological Effects of Domestic, Wild, and Feral Ungulates*. The FEIS as presented above considers the conclusions of that article.

RESPONSE TO REMEDIES BROUGHT FORTH BY OBJECTORS:

- 1) 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 (*Washington Cattlemen's Association*).
 - a. The Annual Grazing Use Indicators guideline associated with the selected alternative provides a great deal of flexibility for adjustment of thresholds and parameters measured based upon site characteristics.
- 2) 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." (*Washington Cattlemen's Association*).
 - a. It may be wise to reconsider whether the agency wants to use the term "shall" or "should" in MA-STD-RMA-01 as one does provide more stringent limitation on subsequent decision space than the other.
- 3) The Colville should use flexible and concise language that allows for practical implementation of project activities. (*Washington Cattlemen's Association*).
 - a. With the exceptions noted elsewhere, the language used relative to grazing appears to be adequate for practical implementation of project activities.

- 4) 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. (*Washington Cattlemen's Association*).
 - a. Nothing within the revised LMP would preclude the Forest from completing NEPA on the 16 vacant grazing allotments thereby providing what is requested (response to comments FEIS, Vol. III, pp. 1009).
 - b. The analysis intentionally does not address grazing effects on wildfire risk because of the annual spatial variability and ephemeral nature of the effects.

- 5) Remove reference of WCF in the 2018 revised plan (*Washington Cattlemen's Association*).
 - a. The DROD made modifications between draft and final related to the grazing standards and guidelines. "The WCF is now not specifically identified in the guideline as a driver in establishing existing condition. However, the WCF provides information that can and will be used as part of the evaluation with other specific, local information that will also play a prominent role in establishing existing condition for a specific site." (DROD, pp. 15)

Return to range capability guidelines that remove lands incapable of producing 200 lbs./acre/year of forage from grazing (*The Lands Council*).

- a) This was a misapplication of the white paper template that could/should be corrected as an errata, however, it will probably make very little difference in the capable range acreage.

Return to the 6 inch stubble height forage management parameter in the Draft Forest Plan (*The Lands Council*).

- b) I see no reason to entertain this suggestion.

Set an adhered to schedule of forage monitoring and posting results with public access (*The Lands Council*).

- c) The Forest has the discretion to exercise this option when they implement the plan, but the LMP is not the proper planning level to make those determinations.

Each allotment should be evaluated for suitable forage and results posted for public access. (*The Lands Council*)

- d) This is often done for allotment planning but LMP is not necessarily the appropriate planning level for providing/considering/evaluating this information.
 - e) Since the range capability and suitability determinations are mapped a comparison against an allotment map can provide the requested information at a gross level.
- 6) Modify Allotment Management Plans and Allotment Operating Instructions, and put into place Forest Wide Standards and Guidelines for the following (*The Lands Council*).
 - Livestock grazing should only be permitted on acreage considered capable/suitable.
 - a) This represents a misunderstanding of definitions and usage to the terms capable and suitable. The analysis clearly displays that the determination of where to allow grazing to

occur is part of the determination of suitability. Grazing may or may not occur on land considered not capable and not suitable for grazing.

- Livestock grazing should only be permitted in open defensible spaces, failure to limit grazing to these spaces puts livestock and wildlife in harm's way.
 - a) This appears to be expression of opinion.
- Livestock will not be released or managed in areas within one mile of a known active wolf site, den or rendezvous, wildlife management should implement appropriate seasonal restrictions based on site specific consideration and potential activity effects, to reduce disturbance to wolves and protect livestock.
 - a) The FS is not the regulatory body for gray wolves.
- Do not authorize turnout or grazing of sick or injured livestock.
 - a) This statement displays a lack of knowledge of the goals and objectives of livestock operators using the NF for forage.
- Remove sick and injured livestock and remove carcasses so they do not become predator attractants.
 - a) There is no reason for the FS to place itself in this decision space that is managed between the regulatory authority responsible for predators and the livestock operator.
- Do not authorize salt or other livestock attractants near a known active wolf den or rendezvous site.
 - a) There is no reason for the FS to place itself in this decision space that is managed between the regulatory authority responsible for wolves and the livestock operator.
- Do not authorize turnout of livestock in an area of known (during the same calendar year that use is documented) wolf den or rendezvous site. Alternative grazing site away from known wolf areas should be offered when possible.
 - a) There is no reason for the FS to place itself in this decision space that is managed between the regulatory authority responsible for wolves and the livestock operator.
- Remove livestock from grazing allotments when conflict with wolves or other wildlife occurs.
 - a) There is no reason for the FS to place itself in this decision space that is managed between the regulatory authority responsible for wolves and the livestock operator.
- Require a 24 hour human presence on an allotment following documented conflict with wolves or other wildlife to protect livestock and public trust wildlife
 - a) There is no reason for the FS to place itself in this decision space that is managed between the regulatory authority responsible for wolves and the livestock operator.
- Establish grazing guidelines and standards to protect native wildlife - including gray wolf, native fish and plants; (*The Lands Council*)
 - a) The annual grazing use indicators are intended to improve or maintain habitats.
- Establish guidelines and standards that suspend grazing authorization in upland meadows and other high concentration grazing areas where soil damage, loss of ground cover including native grasses & shrubs exceeds 85% of historic range of variability (including pre-grazing of domestic livestock); (*The Lands Council*)
 - a) The LMP is the inappropriate planning level for determining these site-specific limitations.
- Modify Allotment boundaries to close the Kettle Crest above 5,000' to all permitted cattle & sheep grazing to protect the Pacific Northwest National Scenic Trail, sensitive plants, wildlife and water sources;

- a) The FEIS and associated DROD considered this recommendation and specifically determined this area to be suitable for livestock use.
- Range permittees must repair damage their livestock do to recreation trails and water sources. (*The Lands Council*)
 - a) While this recommendation is not consistent with general policy, nor I suspect the planning that authorized the trail construction to begin with, it is appropriate for project level planning consideration rather than the LMP level
- 7) To the extent feasible, natural materials will be used to prevent cattle from grazing within the historic high water mark along fish bearing streams. (*The Lands Council*)
 - a. This proposal is appropriate for consideration at the project planning level, not the LRMP level.