

## Recreation and Grazing

The Lands Council

**The objector contends the FEIS, draft ROD and LMP fail to fairly discuss the most pressing public concerns about livestock grazing impacts to recreation users in violation of NFMA and NEPA. In addition, the FEIS/ROD/LMP fail to protect recreation infrastructure, sensitive plants and water resources from grazing abuses which negatively affects recreation users and the rural tourism economy.**

### Response:

Relevant direction in the Proposed LMP:

#### *FW-DC-LG-02. Economic and Social Contributions*

... Grazing continues to be a viable use of vegetation on the Forest. Availability of lands identified as suited for this use contributes to providing animal products, economic diversity, open space, and promotes cultural values and a traditional local life style. ... Consistent with sustaining other resource desired conditions, a viable level of forage is available for use under a grazing permit system where use typically occurs on an annual basis, generally between June and October...

#### *FW-STD-LG-01. Stock Driveways*

Do not authorize stock driveways along nationally designated (Recreation and Scenic) trails.

#### *FW-GDL-LG-02. Permitted and Recreational Grazing in Congressionally Designated Wilderness*

Stock should be managed to discourage congregating on trails, destination areas, cultural sites, and fragile plant communities.

#### *MA-DC-KCRA-06. Other Forest Uses*

Where suitable, other forest uses such as permitted grazing, forest products gathering, and timber harvest is encouraged in a manner compatible with or that enhances the values for which the recreation area was established.

#### *MA-GDL-KCRA-01. Permitted Grazing*

Braided trails resulting from permitted grazing that are located near National Forest System trails should be restored or blocked. Rock cairns or signs should be installed in areas with braided trails to reinforce the designated trail route.

### Conclusion:

The FEIS does not specifically address potential impacts of grazing to recreation.

The FEIS does, however, reference how grazing impacts on recreation would be addressed at the project/allotment scale:

- ***Other Topics Related to the Decision to be Made - Allotment Management (FEIS, page 21)***  
*... The revised land and resource management plan and alternatives identify suitable uses (including grazing) for each management area and the FEIS discloses the effects of grazing on other resources. Alternatives are not designed to change boundaries, end grazing, or make site-specific changes to allotments. The revised land and resource management plan describes*

*management direction, such as desired conditions for the variety of vegetation types within grazing allotments, that may result in future changes to allotment management plans.*

- **Plan Components Common to All Action Alternatives - Livestock Grazing** (FEIS, page 35)  
*The revised plan proposes no changes in the status, location, or boundaries of permitted range allotments or type of livestock. However, plan components that affect management of livestock grazing would vary by alternative.*
- **Alternatives with varying levels of livestock grazing** (FEIS, page 80)  
*Determinations about the type and amount of grazing, seasonal restrictions, and site-specific direction are determined during that project-level analysis. The purpose of the land and resource management plan is to identify whether domestic livestock grazing is a suitable use for each management area and provide objectives, standards, and guidelines that guide project-level analysis to move those lands toward desired conditions.*
- **Summary of Effects - Grazing** (FEIS, page 342)  
*There are no proposed changes in the location or boundaries of permitted range allotments or type of livestock across alternatives. Boundaries, AUMs, and management of allotments are expected to change over time, based on site-specific analysis through the NEPA and allotment management planning process; however, this does not vary by alternative. Grazing standards and guidelines differ by alternative and grazing practices may vary based on differences in standards and guidelines in each alternative. Potential differences are discussed in the effects analysis section.*
- **Economic Impacts** (FEIS, page 595)  
*The alternative impacts of separate issue categories for this economic impact analysis have been combined. For example...Livestock Grazing and Road Density affect recreational opportunities; however, Motorized Recreation is the primary issue category impacting recreational opportunities.*
- **Livestock Grazing and Rangeland Vegetation Management** (FEIS, page 597)  
*Projections of cattle grazing are the same across all alternatives. However, the management of potential impacts of livestock grazing on riparian-based recreation settings and nationally designated trail systems may increase costs to grazing permittees. Likewise, recommended wilderness, non-motorized recreation, and reduced road density management may also increase the cost of livestock grazing management.*
- **Response to comments – Appendix E of FEIS** (FEIS, page 1077)  
*Livestock grazing was not identified as an issue to be addressed in the proposed revised forest plan (see FEIS chapter 1), so the various alternatives did not make changes to livestock grazing or grazing allotments except where they interact with other resource issues identified in the need for change.*

The revised LMP meets all requirements and policy pertaining to grazing. There were no differences in alternatives relative to grazing and grazing was not identified as an issue to be addressed in the revised forest plan. Suitability was the only decision made in the revised LMP. Additional measures to protect recreation may be considered later, at the allotment scale, and included in the permit and/or AMP. There is no violation of NEPA or NFMA.

## **RESPONSE TO THE REMEDIES BROUGHT FORTH BY OBJECTORS:**

- 1) *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;*

The Forest plan identifies suitable uses for each management area, including livestock grazing. Reference the FEIS appendix G *The rangeland capability and suitability analysis*, and *Range Specialist Report*. The LMP also provides direction and sideboards that future projects and management activities must achieve/move toward.

Decisions pertaining to the management of specific grazing allotments are made after project-level environmental analysis for the relevant allotment. Applicable LMP direction must be included in the term grazing permit, to ensure compliance with the parameters set in the proposed revised forest plan. In addition, Individual allotment management plans (AMPs) are developed to integrate management of range vegetation with other resource programs to achieve multiple use objectives contained in Forest land and resource management plans. Further, existing Term Grazing Permits will be modified, through Annual Operating Instructions, to conform with Forest Plan direction (Draft ROD, pages 36-37).

There are some plan components specific to the Kettle Creek Recreation Area (*MA-DC-KCRA-06 and MA-GDL-KCRA-01*) that ensure a recreation focus/priority and the protection of trails. They are listed in the “Applications” section of this document.

2) *Range permittees must repair damage their livestock do to recreation trails and water sources.*

Decisions pertaining to specific authorized livestock grazing impacts to recreation will be addressed at the project/allotment scale.

#### **POSSIBLE INSTRUCTIONS (if any):**

The forest may want to consider some changes/additions to plan components related to grazing.

For example:

**FW GDL:** Allotment management plans should include measures to minimize conflicts between livestock and recreation use. Note – this could also be written as a management strategy as opposed to a guideline.