

GRAZING STUDY GROUP

Finding of Facts

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The following statements are derived from notes from the three independent Grazing Study Group meetings and are supported by credible sources such as Forest Service staff, Forest Service Manuals and Handbooks, and Congressional laws.*

FOREST SERVICE PLANNING

Fact: Colville National Forest Plan revisions have been in process since 2003. The **only revision affecting range management is consideration of utilization standards**; no conclusions have been reached.¹

Fact: During the Plan revision process, the Forest Service has received many public comments. Input from a diverse group (those representing the Blueprint, the Summit, mountain bikers, ranchers, etc.) has been received and will be used to develop the final Forest Plan revision. **These revisions are not final until a forest supervisor signs off on them.**²

Fact: There is no set schedule for the review and/or revision of the Congressional Grazing Guidelines (guidelines developed by Congress to manage grazing within Wilderness); issues dealing with grazing are addressed as they arise³.

Fact: **Inventoried Roadless Area (IRA) evaluation is required by law when forest plans are revised.** There is a draft IRA map. The Forest Service is still taking input regarding Roadless Area inventory⁴. **Wilderness is a separate evaluation and is also required by law**⁵.

Fact: Private land is not used to determine where there is an IRA⁶.

Fact: There is no significant private land in-holding within the IRAs included in the Blueprint⁷.

Fact: In regards to the recent USDA Farm Bill (2007), the Forest Manual can be changed to reflect priorities or requirements of the bill, but any changes must follow existing law.⁸

Fact: **In determining what qualifies as an IRA, the Forest Service looks at roads authorized by the Forest Service.** People can go out on the ground and identify what

¹ Comment by Margaret Hartzell, Plan Revision Group Leader, Okanogan-Wenatchee National Forest: 11 Feb. 2008

² Ibid.

³ Comment by Travis Fletcher, Range Management Specialist, Colville National Forest: 26 Mar. 2008

⁴ Comment by Margaret Hartzell, Plan Revision Group Leader, Okanogan-Wenatchee National Forest: 11 Feb. 2008.

⁵ Forest Service Manual (FSM) 1923.03: Land Management and Planning; Wilderness Evaluation: 2006 (43).

⁶ Comment by Margaret Hartzell, Plan Revision Group Leader, Okanogan-Wenatchee National Forest: 11 Feb. 2008

⁷ Comment by Margaret Hartzell, Plan Revision Group Leader, Okanogan-Wenatchee National Forest: 11 Feb. 2008, updated 17 May 2008.

⁸ Comment by Margaret Hartzell, Plan Revision Group Leader, Okanogan-Wenatchee National Forest: 11 Feb. 2008.

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looks like a road, but unless it is an official Forest Service road, it is not considered to deny or accept an area as an official IRA. The Forest Service checks its own paper trail where a 4WD road exists (South Huckleberry IRA, for example), and this influences the IRA determination process.⁹

GRAZING ALLOTMENTS IN THE COLVILLE NATIONAL FOREST

Fact: There are 715,617 acres of the 1.1 million acre Colville National Forest in grazing allotments¹⁰. Nearly all of the Colville National Forest that is west of the Columbia River is within grazing allotments. There is some checker-board land ownership patterns in the Pend Oreille valley that are not within designated grazing allotments. . The Forest Service has abolished some allotments that were found to be not suitable for grazing.

Fact: There are a total of 52 grazing allotments on the Colville National Forest; 44 of these allotments are active and eight are vacant¹¹. Some have been vacant for a long time; people lost interest in them. The Forest Service is doing an environmental review on the active allotments and it is estimated that it will be 2011 or beyond before the vacant allotments are reviewed.

Fact: A list of the vacant allotments is as follows¹²:

- Bangs, recently vacant
- Empire, near Republic and vacant about 5 years
- First Thought, vacant for a long time.
- Gillette (was Hedrick's), vacant for a long time.
- Graves Mt., vacant for a long time; no effort to change allotment from sheep to cows, has dense lodgepole, as well as Sherman Cr. Game Range and Hwy 20 issues.
- Henry Cr., near Republic.
- Lost Lake, near Ione.
- Renner Lake allotment near the Kettle River. The permittee cancelled due to problems, but NEPA was done in 2000, so there is the potential for stocking about 40 animals here.

Fact: There are currently 41 permittees with active permits. There are 5,521 cows under permit¹³.

Fact: Term Grazing permits are usually issued for a period of ten years unless there is reason for a shorter amount of time. Expiring grazing permits are usually renewed unless there is good reason and documentation not to..¹⁴

Fact: Although there is high interest in the vacant grazing leases, these are unavailable until NEPA is completed, which can take anywhere from 90 days to several years.¹⁵

⁹ Ibid.

¹⁰ Comment by Travis Fletcher, Range Management Specialist, Colville National Forest: 22 Feb. 2008.

¹¹ Ibid.

¹² Ibid.

¹³ Ibid.

¹⁴ Ibid.

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DIFFERENCES & SIMILARITIES BETWEEN INVENTORED ROADLESS AREAS (IRAs) AND WILDERNESS

Fact: Grazing that existed before a wilderness is designated is permitted and authorized to continue¹⁶; in areas where wilderness was designated in the same space as grazing allotments, changes “have not been that dramatic.”

Fact: The management goal for MA-11 is to manage these areas **to protect the existing unroaded character and to provide opportunities for dispersed, non-motorized recreation**¹⁷.

Fact: The management goal for the Salmo-Priest Wilderness Area is different from MA-11 and uses different management tactics and strategies to achieve the goal for the area. The goal is to feature naturalness, opportunities for solitude, challenge, and inspiration, and within these constraints to provide for recreational, scientific, education, and historical uses¹⁸. There are no grazing allotments in the Salmo-Priest Wilderness Area nor were there at the time it was designated wilderness.

Fact: In carrying out this goal, a non-degradation policy of management shall be followed. The non-degradation principle directs that each wilderness must essentially be as wild as it was at the time of classification, or if conditions are not known and cannot be reconstructed for the time of classification, the first Wilderness condition inventory should be used as the benchmark for maintaining wilderness conditions. Additionally, regulations direct that conditions shall be improved in situations where natural processes are not operating freely, and where the values for which a wilderness was created are impaired¹⁹.

Fact: In regards to grazing being managed differently between an area categorized as MA-11 and an area categorized as wilderness, the reality is **that decision-makers steer away from making controversial decisions because an area is wilderness**²⁰.

Fact: The difference between current MA-11 management and wilderness is that **wilderness is immutable – it lasts – the Forest Service can change MA-11 (roadless management with the stroke of a pen.**²¹ Wilderness can only be established by Congress and managed by the federal agency that previously managed the land²².

¹⁵ Ibid.

¹⁶ FSM 2323.22: Recreation, Wilderness, and Related Resource Management; Management of Range: 2007 (22)

¹⁷ Colville National Forest Land and Resource Management Plan, pg 4-119-122: 1988.

¹⁸ Colville National Forest Land and Resource Management Plan, pg 4-109-113: 1988.

¹⁹ Ibid.

²⁰ Comment by Travis Fletcher, Range Management Specialist, Colville National Forest: 22 Feb. 2008.

²¹ Comment by Tim Coleman, Conservation Northwest: 11Feb. 2008.

²² P.L. 88-577: The Wilderness Act, Section 2(a) & 2(b): 1964.

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Fact: Grazing is prohibited in MA-2, MA 3C and MA-9 and the most restrictive grazing allowed is in MA-11²³.

Fact: **Congress established the basic law regulating range management in wilderness areas with the 1964 Wilderness Act:** it is important to “maintain wilderness characteristics” in the area, although the use of “minimal tools” is permissible²⁴. **The management agency previously tasked with managing the area establishes its own specific standards and guidelines for managing a wilderness area.**

Fact: Alternative designations besides wilderness for certain high-value areas (such as the Kettle Crest) could include a National Recreation Area (designated by Congress), or a recreation area (designated by a Forest Supervisor)²⁵.

EFFECTS OF WILDERNESS DESIGNATION ON GRAZING

Fact: While there is a requirement to revise Forest Plans every 15 years, **Forest Plans can be amended or revised as needed at any time based on changes in the ecological, social, and economic conditions**²⁶.

Fact: **Infrastructure related to grazing and range in an allotment at the time of wilderness designation is the allowable infrastructure**²⁷. **The original Wilderness Act permits allotment grazing permit holders to maintain existing infrastructure,** but whether improvements or new infrastructure are allowed depends upon the individual agency’s management plan and interpretation of regulations by federal land managers.

Fact: The standard in the 1964 Wilderness Act is that grazing “shall” continue where existing prior to wilderness designation and it is subject to “reasonable regulations as are deemed necessary by the Secretary of Agriculture”²⁸. The Forest Service wilderness policy is to “apply congressional guidelines and policies regarding grazing in National Forest Wilderness Areas in a practical, reasonable, and uniform manner”²⁹.

Fact: Forest Service wilderness policy states that “**where practical alternatives do not exist, maintenance or other activities may be accomplished through the occasional use of motorized equipment**”, but also that “**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”³⁰.

²³ Comment by Travis Fletcher, Range Management Specialist, Colville National Forest: 22 Feb. 2008.

²⁴ P.L. 88-577: The Wilderness Act, Section 2(a) & 2(b): 1964.

²⁵ Comment by Margaret Hartzell, Plan Revision Group Leader, Okanogan-Wenatchee National Forest: 11 Feb. 2008.

²⁶ Comment by Margaret Hartzell, Plan Revision Group Leader, Okanogan-Wenatchee National Forest: 17 May 2008.

²⁷ Comment by Travis Fletcher, Range Management Specialist, Colville National Forest: 22 Feb. 2008.

²⁸ P.L. 88-577: The Wilderness Act, Section 4(d)(4)(2): 1964.

²⁹ FSM 2323.22: Recreation, Wilderness, and Related Resource Management; Management of Range: 2007 (22).

³⁰ FSM 2323.22: Recreation, Wilderness, and Related Resource Management; Management of Range: 2007 (25).

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Fact: Range improvement projects that result in modifications to a grazing permit can be financed by a cost-sharing agreement between the permittee and the Forest Service³¹.

Fact: **Forest Service wilderness policy does NOT say AUMs cannot be increased;** they simply cannot be increased at the exclusion of other things such as wildlife.³²

Fact: The Colville National Forest does not have a “let it burn” policy; **mechanical means can be authorized to fight wildfire in all areas of the forest.**³³

Fact: Because turnover of Forest Service staff is a concern in regards to keeping track of what is allowed in each grazing allotment, documentation by staff members is important to minimize this issue, but it is something that will continue to come up.³⁴

Fact: **Grazing allotments** other parts of the West that conflicted with wildlife habitat management objectives **have been traded for other allotments or in some cases, bought out**³⁵.

*Grazing Study Group participants:

- 1) Travis Fletcher, range supervisor, Colville National Forest
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- 3) Tim Coleman, Conservation Northwest
- 4) Claudia Michalke, executive director, Northeast Washington Forestry Coalition
- 5) Maurice Williamson, Williamson Consulting, Inc.
- 6) John Ridlington, US Forest Service (retired)
- 7) Larry Cordes, rancher, Pend Oreille County
- 8) Wayne Madsen, facilitator, retired
- 9) Ted Wishon, Diamond M Ranch, Ferry County
- 10) Jeff Dawson, rancher, Pend Oreille County
- 11) John Dawson, rancher, Pend Oreille County
- 12) Ted Gugielmino, rancher, Stevens County
- 13) Lloyd McGee, Vaagen Bros. Lumber Company
- 14) Dave Konz, K Diamond K Ranch, Ferry County
- 15) Dave Kreft, Stevens County Conservation District
- 16) Tommy Petrie, Pend Oreille County

³¹ FSM 2241.31: Range Management; Range Improvements; Permit Modifications: 2005 (7).

³² Comment by Tim Coleman, Conservation Northwest: 11 Feb. 2008.

FSM 2323.22: Recreation, Wilderness, and Related Resource Management; Management of Range: 2007 (24).

³³ Comment by Travis Fletcher, Range Management Specialist, Colville National Forest: 22 Feb. 2008.

³⁴ Comment by Lloyd McGee, NEWFC President and Vaagen Bros. Forester: 22 Feb. 2008.

³⁵ Comment by Tim Coleman, Conservation Northwest: 26 Mar. 2008.