

Public Comments submitted to Kristina Wolf, RMAC staff, regarding the State Lands Grazing License and Land Management sub-Committee deliverables

Lynn Huntsinger 07/05/2024

The state grazing license is I'm sure going to be discussed a lot but for me one thing really stands out as unnecessary and inappropriate, and it is this part:

"One major distinction within the grazing community is between sheep/goat grazers and cattle grazers. The former are typically paid to graze off vegetation to minimal levels. Their income is derived from fees for grazing. On the other hand, cattle (and sometimes sheep) grazers generally expect to pay to graze. In general, their income is derived from selling animals by the pound; therefore, they typically focus on weight gain."

Why is this needed? All of the graziers to be licensed operating a business, and I don't think we should be telling them how they may make money, or limit their ability to negotiate for a fair price. Yet this seems to be saying that "no matter what you are asked to do, as a cattle producer you cannot ask for payment." In fact, as our need for grazing for wildlife habitat improvement and fuels reductions increases, more and more creativity and innovation will be needed on the part of goat, sheep, and cattle producers to meet complex demands--you need to leave the matter of payment open to specific circumstances of the contract, not have it based on an assumption which is becoming less relevant. I don't think it is the state's business to limit legitimate and much needed business opportunities, and in fact, if we want to keep the ranches that provide the opportunity to use grazing for diverse purposes, we should not be limiting the opportunities of livestock owners to make income from diverse and changing sources. There are cattle producers who are paid, not uncommonly in fact, directly with cash or indirectly through fee reductions and materials provision, in exchange for specific grazing services so the statement is misleading as well. I would replace the phrase with a simple statement that "Cattle, sheep, and goats have all proven useful for fuels reduction and wildlife habitat improvement. Costs will vary depending on availability and the services provided." Or some such. It is really important that we get over the impression that providing certain services should be free or cost the producer nothing to provide. Businesses have a right to compete and a right to make income for the services they provide, period. I'm sure the original phrase came out of some good thought, but it is essentially inequitable and goes beyond what the state should be involved in. What if a THP stipulated what kind of timber company should be paid and what kind should operate for free or pay for the privilege? Please. It also freezes things at a particular point in time and will potentially limit the number of cattle producers able or willing to engage in various positive services, yet cattle graze at least 20 million acres--it's an amazing

opportunity for landscape scale fuels reduction in concert with fire dynamics models. Cattle producers are increasingly interested in diverse income sources, including those from production of ecosystem services. We need this just like we need the services of our sheep and goat graziers. The state should not be interfering with the market here.

Thank you for the opportunity to comment, much appreciated.

Lawrence Ford 7/7/2024, in response to Lynn Huntsinger, above

I concur with the reasoning and recommendations made by Prof. Lynn Huntsinger in her email below.

I think this is a very important topic, one that transcends the grazing lease/license/agreement issue before RMAC, that should be addressed by RMAC more broadly.

I request further discussion by RMAC and other groups (and referral back to the authoring Subcommittee task groups) before finalizing the grazing license/agreement or other RMAC Subcommittee documents.

We need to support the opening up of more/smarter opportunities to increase grazing as critical tools (using all species of livestock and all kinds of public and private grazing operations) in most of our fire-prone and fuel over-loaded wooded and rangeland ecosystems in California, including wildlands, wildland-urban-interfaces, and peri-urban grazable lands. We need grazing, with maximized fuel reduction and conservation benefits and minimized impacts, to prevent the kinds of massive catastrophic wildfires we're starting to experience in California.

Lawrence Ford 7/7/2024

I am writing in reference to the draft "**Comprehensive Land/Grazing Management Plan Template**" that was distributed to "undisclosed recipients" with Kristina's June 19, 2024 email that announced the sharing at earlier RMAC meeting of "Current drafts of the proposed state lands grazing license and land management subcommittee deliverables".

I was a member of the RMAC subcommittee that prepared the "**Management Plan Draft.**" I was the lead author of the original document. My records show the most recent version of the document as edited by our subcommittee was dated Sept 21, 2022. We have not participated in the subsequent editing as indicated by the Dec 8, 2023 versions distributed by RMAC prior to the June 19, 2024 announcement.

I object to the editing of our document since Sept 21, 2022. Our subcommittee was not included in any negotiations on such edits or responses to the comments and decisions made by RMAC or the public.

My concerns include the removal of the requirement that a licensed Certified Rangeland Manager (CRM) be involved in analyses, conclusions, and preparing of management plans for grazing of California rangelands. This seems to me to be in violation of existing regulations (Policy 12 for professional foresters, authorized by the California Board of Forestry, Jan 7, 2009; Memo from Deputy Attorney General Shana Bagley, Aug 4, 2008). The removal of this requirement for such work

in broad ecosystem or geographic terms has not been ruled by a court, and thus should be included in RMAC documents. Note that CDFA healthy soils block grants require CRM participation.

I am also concerned about inclusion of reasoning based on some scholarly documents cited in the public comments that are relevant to a limited set of rangeland ecosystems in California. The primary rangelands of California are in the Mediterranean climate region, and are (unlike other regions) dominated by grasses and forbs native to the Mediterranean Basin (Southern Europe, Middle East, and North Africa). This is a very unique grassland and savanna ecosystem that is considered to be a hotspot of biodiversity. Removal of grazing there would put at risk the habitat quality for many special-status species. Reliance on some of the cited documents in the public comments also neglects other California rangeland regions, including alpine/subalpine, northwest, and Mojave Desert.

The Management Plan originally presented by our RMAC subcommittee is the most comprehensive and science-based framework for grazing management assessment, analysis, and planning of any offered by government or private rangeland managers in California. Furthermore, the greatest challenge to achieve biodiversity conservation with sustainable means for California rangelands is to maximize the benefits of grazing, and minimize the impacts of grazing. Not to exclude or replace grazing, which would be very costly, unfair, unfeasible, unnecessary, and possibly illegal if applied broadly.

I cannot tell from the anonymized edits and comments who the authoritative editor was in making the “clean” version of our document.

Therefore, I insist that both versions of the “Management Plan Draft,” as attached to your June 19, 2024 email, be removed from the RMAC agenda. And that RMAC request direct discussion and negotiation with our subcommittee before any final versions are prepared or presented. If not, then I insist that the names of our subcommittee members and any reference to our endorsement of the documents be withdrawn.

Stephanie Larson 7/7/2024

Thank you for the discussions. We need to focus on how to create more resilient rangelands, through grazing. There are several scenarios to achieve this, and all three grazers (goats, sheep, cattle) have a role. We need to encourage more active, managed grazing pre and post fires. Our research (Theresa Becchetti & I) has documented shrubland returns following 5-10 years post fires. Land managers (Public & Private) are not actively addressing vegetation management following fires; thus, we are bound to repeat the fire cycles. We need to push for managed grazing pre- and post- fires, especially in critical areas.

Targeted grazing can play a role to greatly reduce brush encroachment, prior to fires. Targeted grazing (paid grazing) is the short-term land management option, which can be done with goats, sheep or cattle. Many cattle producers disagree because they're all about weight on their cattle, but there are examples of cattle grazing payments, i.e., vernal pools. After brush removal following targeted grazing, we need to advocate for a long-term grazing solution; cattle grazing is that

solution. We need to advocate for funding programs that compensate for perimeter fencing, tying with NRCS practices, such as water development and interior fencing.

In the long-term solution:

1. Cattle producers have a long-term lease with landowners. They can apply for NRCS or other funding options to make sustainable improvements to the land. Landowners could apply for the Williamson Act (depending on their location) which could reduce their property taxes.
2. No money exchange, lands are grazed, cattle producers get forage for their cattle, landowners have free vegetation removal.
3. Cattle producers are paid for grazing. RMAC should work with CCA and agencies to increase the acceptance of targeted cattle grazing. We need a new paradigm other than weight gaining cattle.

Joel Brown 7/8/2024

This is an incredibly interesting and prescient discussion. People involved in grazing management research and extension have been waiting for (or dreading) this for a long time. If you look at the state of the rangeland resources and the grazing livestock industry around the country, this has a lot of relevance to the climate change adaptation discussion. I think this would be an excellent topic for an article (or several) in *Rangelands*.

Fara Brummer 7/8/2024

Thank you Stephanie for your thoughtful and proactive email. I applaud your research and emphasis of targeted grazing as a solution. We have had two years of back to back catastrophic wildfire here in Lake County (southeast Oregon). Cheatgrass and medusahead have spread as a result, creating future fire disaster (in fact, we just had a small cheatgrass dominated wildfire here in the last month which was thankfully put out rapidly). We need more targeted grazing pre fire in invasive annual grass country. Medusadhead is a little trickier but can be done. The public agencies could play a very active role in this. In our area, it is not so much weight gain that is holding us back, but the traditional pattern of cow calf management on the landscape and really not enough numbers in one area. We are over 70% public lands and outreach is essential for change and creative thinking. I totally understand the producer's point of view but I also think they would be open to change if it makes sense and is methodical. I think we have a lot of work to do in this area

Rich Ross 7/13/2024

In an hour or so I'm heading to Lassen County to trail cattle from the high desert where the grasshoppers have destroyed the feed to 'greener pastures.' That will take a few days so I'll be off the grid when the RMAC meeting takes place. Sorry to miss it all.

As for the grazing agreement template, I think the actual 'license' agreement was finished a year or two ago so I have little to add. The 'license' is a relatively simple document which can have as an

attachment any specific criteria appropriate to the site being grazed. As we all know, sites differ greatly with regard to the ecological attributes and I fear that any template aimed at all situations will so confuse the state agency folks that they will continue to avoid grazing.

It has come to my attention that Lynn Huntsinger takes great umbrage at my comments on a distinction between sheep/goat grazers and cattle grazers referring to it as “unnecessary and inappropriate” and “essentially inequitable.” The ‘offensive’ language is:

"One major distinction within the grazing community is between sheep/goat grazers and cattle grazers. The former are typically paid to graze off vegetation to minimal levels. Their income is derived from fees for grazing. On the other hand, cattle (and sometimes sheep) grazers generally expect to pay to graze. In general, their income is derived from selling animals by the pound; therefore, they typically focus on weight gain."

Our audience for the grazing license template is staff at agencies with potentially grazeable land. I wrote that paragraph to help staffers, who are unacquainted with grazing, understand the world they are dealing with. The local farm bureau asked me to help deal with a regional park where the park officials wanted a cattle grazer to pay to graze but be required to have targeted grazing keeping the cattle on unpalatable forage. Their mindset seemed to be that if the woolgrowers do targeted grazing then the cattle people should too, and everybody knows that cattlemen make tons of money grazing public lands, so why not make the cow folk toe the line like the woolgrowers do. Agency staff like that need to understand that there are two traditional business models in play. That is not to say that some hybrid is not possible or even desirable, but the status quo needs to be recognized.