7. LIVESTOCK GRAZING

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Effects on Grazing

1. The roadless area rule should not interfere with ranchers' access to roads they use to manage range facilities and maintain livestock grazing on public lands.

Response: Because none of the alternatives close any existing roads or trails, they will not reduce current access to National Forest System lands (national forests and grasslands), including access for livestock grazing. This issue was addressed in the Livestock Grazing section of Chapter 3 of the DEIS. Seldom are roads built in roadless areas primarily to provide access to allotments. Any benefits that might have accrued to grazing permittees in the future as a result of new road construction for other purposes in inventoried roadless areas would not occur under the prohibition action alternatives.

2. The Forest Service should reduce the number of grazing permits issued;

3. The Forest Service should curtail grazing on public lands; limit grazing by reducing herd size and protecting riparian areas; or not allow cattle grazing in riparian areas or areas above 3,000 feet in elevation, and severely limit grazing in areas below 3,000 feet;

4. The Forest Service should <u>encourage</u> grazing in order to reduce the effects of fires;

5. The Forest Service should <u>ban</u> grazing in order to reduce the effects of fires;

Response: It is not the intent of the rule to directly address the management of grazing on National Forest System lands; see the purpose and need for the project on DEIS, p. 1-10. Nor are data available sufficient to be analyzed at the national scale on the effects of grazing in inventoried roadless areas (Purpose and Need section of Chapter 1 of the DEIS and FEIS). Refer to Response 6 for more detail on whether or not grazing should be permitted in roadless areas. Chapter 3 of the DEIS (pp. 3-177 through 3-178) disclosed the impacts of the alternatives on livestock grazing.

Whether grazing increases or decreases the likelihood of fire, and its effects on fires, is a complex question. It depends on many variables including site-specific timing and conditions, and is beyond the scope of the analysis in this EIS. See also Response 7 in the Fire section of this volume.

6. The Forest Service should ban cattle and OHVs in riparian areas; and

7. Address the issue of whether livestock should be permitted in roadless areas.

Response: After careful review of public responses to the Notice of Intent published on October 19, 1999, the Forest Service determined it would consider prohibiting only those activities that are likely to significantly alter and fragment landscapes at the national scale (DEIS p. 1-10). Therefore, the agency decided to analyze prohibition alternatives that would limit road construction, reconstruction, and timber harvest only. These activities often result in immediate, irretrievable, and long-term loss of roadless characteristics. The reason for the focus on roads and timber was described in the Purpose and Need section of the DEIS on pp. 1-10 through 1-12.

The new NFMA Planning Regulations (36 CFR 219) have made the decision on the procedures to further protect roadless area characteristics during forest and grassland and project planning. Limiting grazing or off-highway vehicle use may be considered during this local planning process. Local processes include public involvement in decision-making.

8. The Forest Service must protect grazing interests so that ranchers won't sell and develop land.

Response: The Livestock Grazing section of Chapter 3 of the DEIS (pp. 3-177 through 3-178) concluded that the prohibition action alternatives will not affect existing routes of access to grazing allotments, or the future supply of allotments. Because the action alternatives represent no change from current conditions, the alternatives should not cause ranchers to sell and develop their land. Refer to the DEIS and the Livestock Grazing section of the *Socioeconomic Specialist Report (May 2000)* for a full discussion of the impacts of the alternatives on ranching interests.

Economics

9. The Forest Service should base animal grazing permits and fees on market rates.

Response: The Forest Service recognizes the diversity of national opinion on this question. However, the issue of grazing permits and fees is beyond the scope of the proposed rule and the analysis in this FEIS. The rule does not propose any change to grazing permits or fees, nor would the prohibitions limit grazing in inventoried roadless areas. Grazing fee formulas are determined by Congressional action and are outside the authority of the Forest Service.

Access

10. The Forest Service should honor statements in the initiative that the proposed plan would not affect existing routes of access to grazing allotments and that roads or trails will not be closed because of the prohibitions.

Response: None of the prohibition alternatives considered in the DEIS would reduce access to the national forests or grasslands from current levels. They would not close any roads, nor would they prohibit motorized use where it is currently allowed. Under the new Planning Regulations (36 CFR 219), future decisions on motorized access to inventoried roadless areas and unroaded areas would be made at the local level with public involvement. Future decisions on road closures will be made independent of the Roadless Area Conservation Rule, under the Road Management and Transportation System Proposed Rule (proposed Roads Policy), which also includes public involvement.

Refer to Response 1 for a specific description of how the alternatives affect access for grazing.

11. If local managers are given the authority to consider additional management protection for roadless areas beyond the national prohibitions, they could decide to disallow grazing and motorized access to grazing allotments in roadless areas.

Response: Under the new Planning Regulations, local managers would have the option to disallow grazing and other uses in inventoried roadless and unroaded areas if deemed necessary to protect their roadless characteristics. Such planning and decisions about how to manage uses within roadless areas would occur locally with full public participation.

End of Livestock Grazing Section