



October 23, 2020

Montana Forest Action Plan Advisory Council
 Department of Natural Resources and Conservation
 1539 Eleventh Ave.
 Helena, MT 59601

Members of the Montana Forest Action Plan Advisory Council:

On behalf of the Montana Public Lands Council (MPLC) and the Montana Stockgrowers Association (MSGA), we appreciate this opportunity to provide comments regarding the Montana Forest Action Plan.

Since 1884, MSGA and MPLC have been dedicated to finding proactive solutions to the most difficult challenges facing Montana's cattle ranching families and effectively represent Montana public lands grazing users. Since the settlement of the West, particularly in Montana, lessees of federal lands have been responsible, environmentally conscious land managers in partnership with the federal government. In turn, these lands, in combination with private landownership, help to create many viable ranching operations for rural families, contributing to our local economies, preserving our Western heritage, and creating thriving wildlife populations.

Since the codification of the Federal Land Policy Management Act, the National Forest Management Act, and the Public Rangeland Improvement Act, to name a few, grazing has been an integral component of the successful management of public lands. In creating these policies, it was recognized that *"grazing has always been part of the western scene, and livestock ranching has had a major role in public land use."* In addition, it was acknowledged, *"Cattle and sheep are not only an important foundation of western economy, but their presence is an accepted feature of the scenery and the environment."*

We believe livestock grazing is an integral component to successful forest management, forest health and decreased fire risk. Our organizations will focus our comments on the impacts of livestock grazing as it relates to the plan and ask for a larger consideration of Montana public land grazing users as an important and necessary stakeholder in this plan.

Wildfire Risk

Research shows livestock grazing is an effective tool on public lands and helps to mitigate the risk of catastrophic fires, cycles nutrients through soil and fosters healthy habitat for wildlife. Livestock grazing is the cheapest and most effective way to reduce fuel loads in forests. Forests not grazed have increased and long-term fire fuel issues. We encourage continued use of grazing in forests and ask for additional consideration of increased access and grazing permits as grazing does prevent catastrophic wildfires.

We encourage cooperation and consultation with the grazing permittees on the use of prescribed fire to increase the suitable rangeland on allotments. We recommend engaging with permittees early in the process to ensure alternate grazing plans are put in place. We also encourage the council to look at current research from the ARS Fort Keogh Station in Miles City, regarding post fire grazing. This research shows a two-year deferment is not required and if conditions are adequate, grazing can resume the following year.

Forest Health

We support proactive efforts to manage conifer encroachment. Many permittees have stated their reduced forage availability has been greater than 10% due to encroachment. We encourage action to address encroachment and utilization of forest thinning and timber production to reverse this trend. It is critically important to work with ranchers to find suitable alternatives as these management actions are executed.

Biodiversity and Habitat Conservation

Our organizations recognize the importance of wildlife and provide a significant amount of forage on private lands to sustain these healthy populations. Wildlife is positively influenced by forage regrowth followed by livestock grazing. Current grazing plans ensure forage utilization levels are at a level that is beneficial to the range resource, but as many wildlife populations increase beyond population objectives, it is not reasonable for the grazing permittee AUMs to decrease. There must be a balance between these uses.

We would also be remiss if the concern of invasive species was not pointed out. Noxious and invasive weeds are an issue that affects all users. The spread of noxious weeds negatively impacts all users and wildlife, and it should be a priority. We recommend working with the permittees and local governments to develop weed cooperatives to address the spread of these invasives. Grazing permittees can be an asset in the fight to control weeds through public-private partnerships.

Human and Community Health

While we understand the desire to increase access to public land for recreational opportunities, we feel it is important to work with agencies and recreation groups to find acceptable solutions for all stakeholders. Additional recreation use results in added operational expenses for permittees, including weed management or fence repair. We recommend the inclusion of a statement that the Council will foster collaborative efforts to address conflicts and help reduce the costs for permittees.

The Montana landscape is diverse, not only in topography, but also in ownership. With approximately one-third of our state in federal ownership, it is critical for individuals, city and county governments, and the state of Montana to work with our federal partners to find feasible land management decisions. It is important to consider a wide range of remedies as this effort moves toward reducing hazardous conditions and improving the health of our forests.

Once again, I would like to thank the Montana Forest Action Advisory Council for the opportunity to provide comment on this important document. As ranchers and resource managers, we strive to continue to improve the range resource on federal, state, and private lands. Public lands are critically important to the ranching community and the public, and ranchers will continue to be a partner to enhance these values and protect the resource.

Sincerely,



Raylee A. Honeycutt

Director of Natural Resources | Montana Stockgrowers Association
Executive Secretary | Montana Public Lands Council