Testimony
on behalf of the

Public Lands Council

with regard to:

"H.R.7666 – *Operational Flexibility Grazing Management Program Act"*

submitted to the

House of Representatives Natural Resources Committee
Subcommittee on Federal Lands

Chairman Tom Tiffany
Ranking Member Joe Neguse

submitted by:

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Member
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Chairman Tiffany, Ranking Member Neguse, and Members of the Subcommittee, thank you for the opportunity to provide testimony on Congressman LaMalfa's bill, H.R.7666. My name is Sherri Brennan, and I am from Sonora, California. I live and raise cattle in Tuolumne County, home to the Stanislaus National Forest and just adjacent to one of the world's most iconic national parks: Yosemite National Park. I am a public lands grazing permittee on the Stanislaus and have held a grazing permit since 1985.

Today, I'm testifying on behalf of the Public Lands Council (PLC), the organization that focuses solely on representing the cattle and sheep producers in this country who hold federal grazing permits. Founded in 1968, PLC sprung from the recognition that federal grazing permittees face unique and mounting challenges because they not only factor in the careful management of their private lands, but they are also engaged in a constant negotiation with the federal government on how best to graze and manage their public lands grazing allotments.

This balance is one I know well, both as a grazing permittee and Tuolumne County Supervisor for District One, which is why I am so pleased to support H.R.7666, which would require development of a strategy to expand the use of targeted grazing in wildfire reduction strategies, resulting in a more fulsome incorporation of grazing in the agency's planning toolbox.

In California, effective land management is crucial since much of the forest and grazing land is owned or managed by the federal government. Sadly, fire is a constant part of our planning. Today, I will be sharing my experiences from the 2013 Rim Fire, which burned 257,171 acres in Tuolumne County as a prime example for why targeted grazing is absolutely crucial if we're going to make meaningful strides in reducing catastrophic wildfire risk. When the Rim Fire started, it was the largest fire in the Sierra Nevada Range and the 3rd largest wildland fire in California. Today it ranks 12th in size for California and is no longer ranked in the top 20 for the most destructive/costliest fires. The four biggest fires in California history – totaling more than 2.8 million acres – have all occurred in the last six years. Before that, the Santiago Canyon Fire in 1889 was the largest fire in California history that burned 300,000 acres[1].

We now regularly see fires that exceed 300,000 acres, and sadly this is not unique to California. This year alone, more than 8 million acres burned across the country[2], with several record-breaking fire seasons for Western states. This number exceeds the 10-year average for both the number of fires and the number of acres burned, confirming a troubling trend in the West's expectations for worsening fire seasons.

This trend has clear roots in the land management decisions with which this Committee is intimately familiar. Decreasing timber harvests, reduced hazardous fuels reductions, and similarly harmful reductions in grazing on federal lands have resulted in millions of acres across the West being at higher risk from catastrophic wildfire than necessary. Over the last several decades, the number of livestock authorized to graze on federal lands has been significantly reduced. Today approximately 4,000 cow/calf pairs graze on 35 active allotments on the Stanislaus National Forest down from the peak of 19,500 animals in the 1950s.

[1] Western Fire Chiefs Association, November 17, 2024.
[2] National Interagency Fire Center, November 17, 2024.

The federal agencies have also significantly reduced the use of proven techniques for controlling fuels like timber harvests and salvage sales and have been limited in effective use of methods to control fine fuels, like prescribed fire and grazing. Some of these have been limited by dry summers and challenging weather conditions, but the agencies have been reticent to use tools like targeted grazing even when conditions are ideal for this kind of non-invasive fuels reduction.

Properly applied, prescribed grazing for vegetation management (also referred to as targeted grazing) is a climate-smart solution to removing flammable vegetation and altering fuel profiles to influence fire behavior and create defensible space[3], [4]. It can replace other more energy-intensive fuels management techniques (like mowing and herbicide application) and, along with prescribed fire, is the only fuels management technique that removes fuel from the landscape, and simply does not rearrange it. At the end of this testimony, I have provided a map that demonstrates the complicated forest land use limitations that triggered the Rim Fire. This complex patchwork of land management designations is applicable on many forests throughout the West today, as grazing permittees and land managers face increasing demands to manage multiple use in challenging ecological conditions.

California's recent experience with catastrophic wildfire emphasizes the need to use all available tools, including livestock grazing, to adapt to changing conditions[5]. The Rim Fire set a new level of destruction for our community, industry, the environment and three local ranching families with USFS grazing allotments, within the Rim Fire perimeter. Aside from the soaring loss of dead cattle and physical infrastructure, the economic loss from the 3rd and 4th quarters on the tourism industry exceeded $100 million, schools were closed for weeks, and 15,000 residents were under evacuation orders. Wildfire smoke, which contains nitrogen oxides, volatile organic compounds, and particulate matter, harmful impacts on human health were detected in two-thirds of the state of California, and a large portion of Nevada.

The fire also threatened the Hetch Hetchy reservoir, the main source of water for San Francisco. On August 26, the San Francisco Public Utilities Commission moved water away from Hetch Hetchy into downstream reservoirs located in San Mateo and Alameda Counties. Within the Rim Fire perimeter, 45 California Spotted owl nesting sites and 1/5 of the known Great Grey owl nesting sites in the state of California burned the majority within high severity burn zones.

The Rim Fire emitted an estimated 15 million metric tons of carbon, equivalent to three million cars and destroyed up to $72 million dollars' worth of carbon storage on private lands. Roughly 75% of the private land or 75,000 acres were treated and have a thriving mixed conifer forest. It's also important to note that the 15 million metric tons of greenhouse gas that were emitted during the active fire period represent only 10-15% of the total Greenhouse gas emitted by the Rim Fire. Local estimates suggest that an additional 90 million metric tons will be emitted through the ongoing decay process over the next decade.

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[3] Rouet-Leduc, J., et al. 2021. Effects of large herbivores on fire regimes and wildfire mitigation. Journal of Applied Ecology. 58:12 (2690-2702).
[4] Launchbaugh, K. and J. Walker. 2006. Targeted grazing handbook. University of Idaho. Accessed at https://www.webpages.uidaho.edu/rx-grazing/handbook.htm.
[5] Svejcar, T., et al. 2014. Western Land Managers will Need all Available Tools for Adapting to Climate Change, Including Grazing: A Critique of Beschta et al. Environmental Management 53 (1035–1038).

Grazing – or the lack of grazing – plays a significant role in fire behavior and what comes next after fire. The Eagle Meadow allotment is an example of an area that has seen extreme reductions each time the allotment has changed ownership. The carrying capacity is 150 cow/calk pairs, but the average forage utilization rarely exceeds 20% with an allowable use of 40%. With the yearly compounding fuel load as a result of decreased grazing and timber management, the Donnell Fire in 2018 burned through the Eagle Meadow allotment at an extraordinary and abnormal rate for fire above 6,500 feet of elevation. Sadly, the Donnell Fire devastated the community of Dardanelle and destroyed more than 130 structures.

It's important to distinguish the value of traditional permitted livestock grazing from targeted grazing specifically for fire reduction. All grazing removes dangerous fuels from the landscape in a way that improves the impact of fire on the landscape while focusing on livestock growth and yield. High intensity grazing for a short time can reduce up to 42% of fuels on the landscape[6], which not only reduces the intensity of fire but improves post-fire regrowth. Targeted grazing has similar fuel management benefits, but can be shaped and directed to make the best use of the grazing activity to remove the most amount of fuel from the highest risk locations. Targeted grazing is simply the adjustment of timing, frequency, duration and intensity of livestock grazing to achieve a specific ecological outcome[7]. This flexibility makes it a cost-effective, nimble tool, in contrast with other mechanical tools that cost double or triple the base cost of targeted grazing[8].

A 2020 study from the University of California, Davis calculated that livestock in California removed more than 11 billion pounds of fine fuels that would have otherwise been dangerous tinder for wildfires, and targeted grazing could remove up to 1,000 pounds of fuels per acre which would reduce the flame height and flame speed to less than 4 feet[9]; this is important because 4 feet is typically the threshold where fire becomes too dangerous for firefighters to fight safely.

The need for immediate use of all available tools is clear. Representative LaMalfa knows this well, and H.R.7666 takes immediate steps to ensure all tools – including grazing – are readily available for agency use. Immediate opportunities include:

1. Maintenance of acres previously treated by mechanical fuel reduction work. Grazing is an effective tool to maintain positive ecological conditions, particularly when the goals are retention of native grasses and prevention of woody shrub encroachment.
2. Creation of natural fire/fuel breaks. Because of the way livestock graze, they create a variable pattern of fuel densities. This change in fuel densities changes fire behavior, and reduces the risk of fire intensity, minimizing the percentage of high severity acres burned.

[6] Davies, K., et al. 2022. Moderate grazing during the off-season (fall-winter) reduces exotic annual grasses in sagebrush-bunchgrass steppe. Rangeland Ecology and Management. 82 (51-57).
[7] Bailey, D., et. al. 2019. Synthesis paper: Targeted livestock grazing: Prescription for healthy rangelands. Rangeland Ecology and Management. 72:6 (865-877).
[8] Nader, G., et al. 2007. Planned herbivory in the management of wildfire fuels. Rangelands. 29(5): 18-24.
[9] Ratcliff, F.; Barry, S., et al. (2023). Cattle Grazing Moderates Greenhouse Gas and Particulate Matter Emissions from California Grassland Wildfires. *Sustainability*. 15:18.

3. <u>Maintenance of areas post-fire to prevent adverse ecological outcomes from invasive plants and forbs</u>. After the Rim Fire, USFS excluded grazing from 3/5 of the burned area (150,000 acres) as a matter of "policy consistency". That exclusion allowed invasive non-native grasses to take hold and encouraged conifer encroachment in the "open", freshly- burned space. Grazing resumed more than a year later, but by that time it was too late. Three years after the fire, the area experienced a complete type conversion. What had previously been a mixed conifer stand was now predominantly a brush/oak landscape that decreases forage on the landscape for livestock and wildlife, increases water use, and creates dense stands that are more likely to burn again. Today, less than 20% of the public land has had any mechanical treatment.

One of the current barriers to use of targeted grazing is due in large part to USFS attitudes about targeted grazing. A recently published research brief released by researchers from University of Idaho[10] in coordination and cooperation with USFS personnel from Region 4 and 6 highlights many of the challenges and opportunities embedded within the culture of the agency with respect to utilizing targeted grazing on USFS lands.

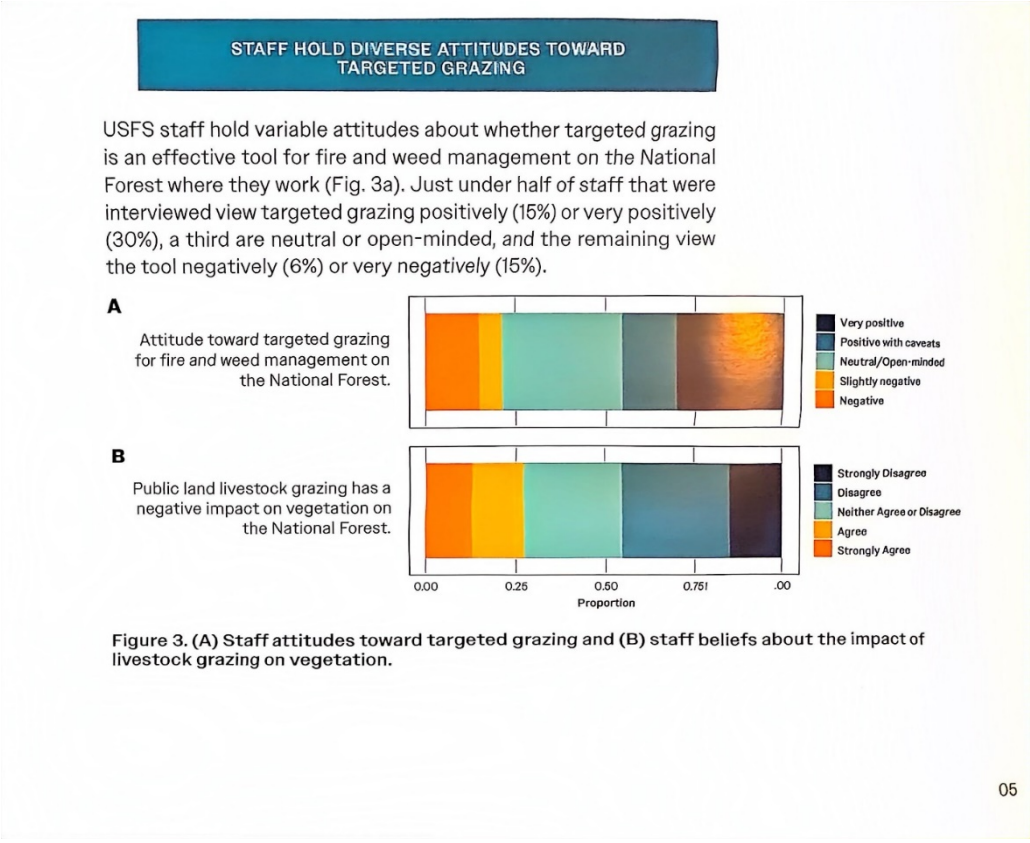


Figure 3. (A) Staff attitudes toward targeted grazing and (B) staff beliefs about the impact of livestock grazing on vegetation.

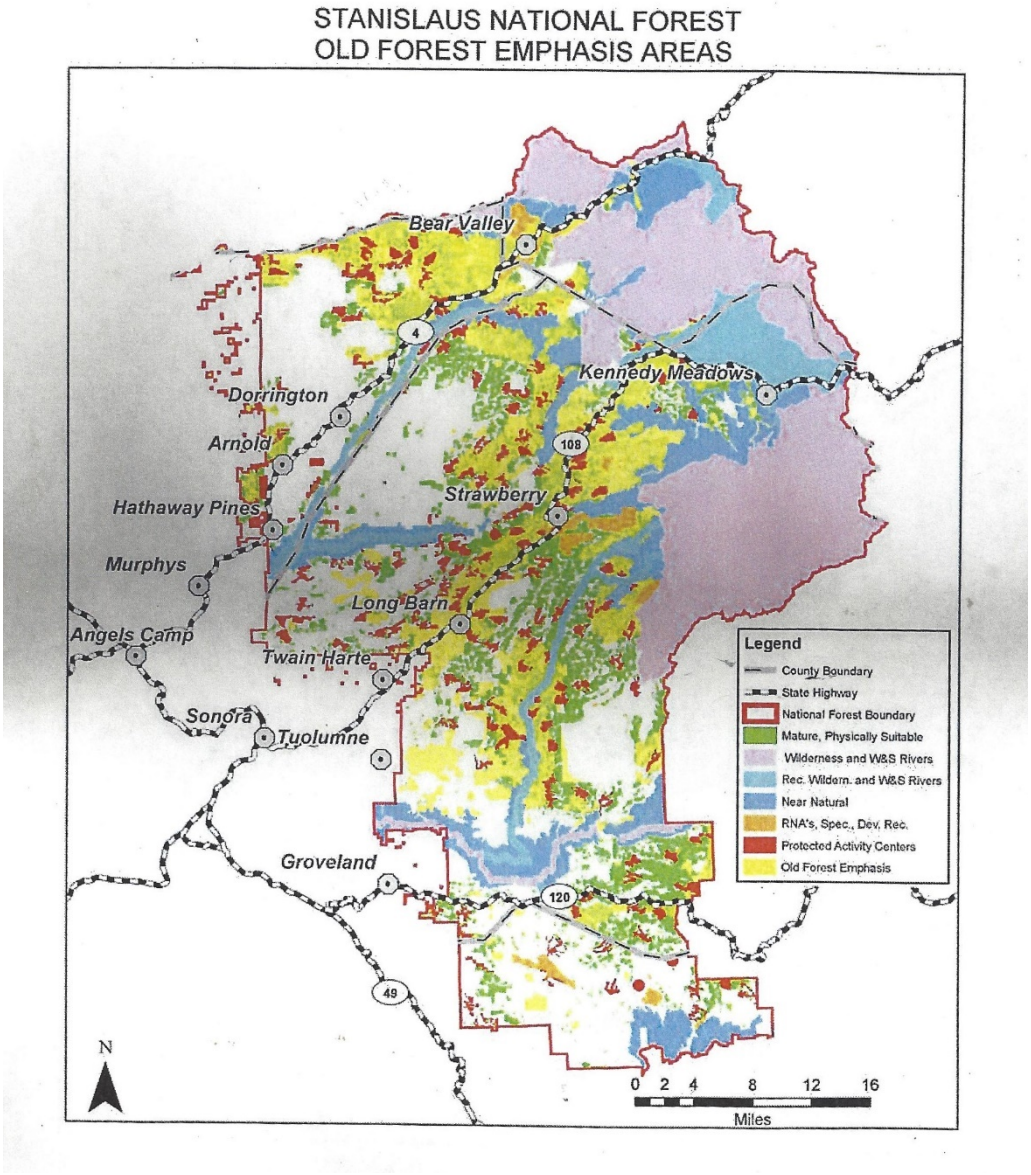
While USFS *may* consider targeted grazing, it often simply does not. Too often, USFS personnel are reluctant to use grazing as a tool to replace treatments like herbicide application or prescribed fire unless their range staff counterparts suggest grazing on a "pilot" basis. Because targeted

[10] Katherine Wollstein, Ph.D., Natural Resources, 2022. Dissertation title: "Outcome-Based Management and Federal Rangeland Administration: Reframing Adaptive Management on a Complex Institutional Landscape." Placement: Extension Assistant Professor at Oregon State University.

grazing is largely treated like a one-off experiment despite the proven benefits, the need for H.R.7666 is clear. Repeatedly in California, comments are submitted to forest plan revisions, like the California Cattlemen's Association and the California Cattlemen's Foundation comments submitted April 2024 on the Draft Environment Impact Statement (EIS)for SERAL 2.0; while there were significant grazing components included in the draft, the agency completely omitted grazing provisions in the final EIS. This trend, unfortunately, continues across the West.
If enacted, H.R. 7666 would direct USFS to capitalize on the mutually inclusive benefits cattle ranchers do every day when they work to produce food and fiber, they are enhancing biodiversity and habitat, sequestering carbon, and protecting the myriad of ecosystem services society benefits from our public lands when we minimize the risk from catastrophic wildfires. Expanding the opportunity to apply targeted grazing will strengthen the protection of communities while expanding economic opportunities throughout the state.

Thank you, Representative LaMalfa, for listening to the needs of all of us in California and across the West and thank you to the Committee for inviting me to testify today.

Appendix A: Stanislaus National Forest Management Complexities



Of the one million acres included in the Stanisluas National Forest, many areas have restricted management potential as a result of layered land management designations: Protected Activity Centers, Wilderness and Wild and Scenic Rivers, Resource Natural Areas, areas with Old Growth Emphasis, and more, all of which limit many kinds of mechanical treatments where targeted grazing can be a beneficial replacement.