

BOARD OF FORESTRY AND FIRE PROTECTION

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Armand Gonzales
CDFW - SWAP 2015 Update
1416 9th Street, 12th Floor
Sacramento, CA 95814

June 11, 2015

RE: SWAP Update

Dear Mr. Gonzales,

The Range Management Advisory Committee (RMAC) would like to issue comment on the California Department of Fish and Wildlife's 2015 State Wildlife Action Plan update. RMAC is a statutory committee of the Board of Forestry and Fire Protection (Board) and advises the Board, the Natural Resources Agency, the Environmental Protection Agency, and the Department of Food and Agriculture on issues related to rangeland management. Its membership comprises of eleven rangeland experts from industry organizations and the general public and it is the only standing committee in State government addressing range issues. They regularly consult technical advisors from state and federal agencies and research and conservation organizations to develop rangeland management policies to recommend to the Board and other agencies. RMAC's mission is to be an advocate to public agencies promoting scientifically and economically sound policies that affect the sustainability of California rangeland resources.

RMAC has comments on the overall approach to grazing in the State Wildlife Action Plan as well as some specific notes on individual conservation strategies and scientific assertions.

Consistent Terminology

On the whole, the document lacks consistent terminology when discussing grazing that has a negative effect on the health of ecosystems. The document interchangeably uses the terms "overgrazing," "excessive grazing," "poorly managed grazing," "incompatible grazing," and "inappropriate grazing" with scattered, if any, definitions that are not consistent from province to province in Chapter 5. By utilizing these terms interchangeably and without defining them, land managers cannot understand how CDFW is framing grazing in the context of wildlife conservation and it limits land managers' ability to implement BMPs for wildlife and economic benefit. Without a clear view of the impact of grazing on the land, effective solutions are difficult, if not impossible, to discern and implement.

Grazing as Environmental Enhancement

While it is understood that the mission of the Plan is to analyze and address stressors on wildlife habitat, grazing is evaluated only as a negative to the environment, and the Plan does not acknowledge the ways present grazing practices enhance and improve habitats for wildlife. The Plan also broadly assigns blame to grazing for issues that are complicated by a variety of factors, including fire regime changes, conifer encroachment, feral horses/donkeys, and increased human development pressures. "Grazing" is a broad term for different land management strategies that result in a variety of positive and negative environmental outcomes. From reading the Plan, however, it would appear that grazing is a wholesale negative environmental impact in need of BMPs, land owner/manager education programs, and an overall reduced existence on California's landscapes.

Throughout the State Wildlife Action Plan, managed grazing is often blamed for wildlife habitat loss that is actually the result of several environmental and human factors. On page 5.4-38, "excessive grazing," although undefined, is blamed for reducing the regeneration of blue oak and other species, when the cited document (McCreary 2001) reads (emphasis added):

Livestock grazing is also believed to be a cause of poor rangeland oak regeneration. This theory is supported by the *rough coincidence* of changing patterns of oak regeneration and widespread introduction and spread of livestock into the state during the Mission Period (Pavlik et al. 1991), beginning in the late seventeenth century.

However, the document goes on (emphasis added):

There may be other factors inhibiting oak regeneration, as well, so that livestock removal alone may have little impact. In a statewide oak regeneration assessment, Muick and Bartolome (1986) reported that *the presence or absence of livestock was not sufficient to explain the pattern of oak regeneration*. And Griffin (1973) stated that “experiences in nongrazing areas, such as the Hastings Natural History Reservation, suggest that even without cows, sapling valley oaks may be scarce.”

The research goes on to discuss other theories such as rodents, changing fire regimes, and climate change as other potential stressors on oak regeneration. However, these multiple factors affecting oaks are not addressed in the conservation strategies, and in fact fire avoidance is promoted in Conservation Strategy 3 on page 5.4-46.

Conservation strategies focus on grazing BMPs, education programs, and exclusion and fencing. They do not address supporting existing and ongoing rangeland research or how to maximize existing BMPs to achieve CDFW’s wildlife conservation goals. They do not mention many of the state and local level partners that already work with ranchers to achieve environmental and economic goals. While addressing the ways in which grazing negatively impacts the environment is vital to improving wildlife habitat, ignoring ways in which grazing has enhanced and can continue to enhance habitat is an omission detrimental to CDFW’s ultimate goals. Rather than maximize the utility of grazing as a tool to enhance wildlife habitats, the Plan has weak strategies for implementing as-yet-unknown-to-CDFW BMPs and generally promotes reducing the amount of grazing in California.

Some organizations promoting existing best management practices include the county-level Resource Conservation Districts, who organize the Ranch Water Quality Short Course to educate ranchers on water quality BMPs among other vital projects, the Grazing Lands Conservation Initiative, California Rangeland Trust, California Rangeland Conservation Coalition, and Point Blue Conservation Science and their Rangeland Watershed Initiative. Partnering with these non-regulatory agencies will be important to communicate and implement programs on rangelands. RMAC is also a resource for connections to scientists, rangeland advocates, Certified Rangeland Managers, and rangeland policymakers.

State Acquisition of Working Lands

RMAC is concerned about the focus on, and broad language of, conservation strategies that address land acquisition, easements, and/or leases of grazing land. Those three land management strategies are used to achieve different land management goals and require very different levels of involvement from the State as a land owner, easement holder, or lessee/lessor. Acquisition of land by the State also requires a budget for the ongoing maintenance and management of the land, the funding for which is not discussed in this Plan. A 2010 white paper by RMAC, submitted to the Natural Resources Agency, discusses the threats unmanaged landscapes pose to adjacent lands and examines methods by which state agencies can address the funding shortfalls that lead to a shortage of management options. Overall, however, RMAC would prefer to see fewer conservation strategies focused on taking rangeland out of production. In their current form, many of the conservation strategies related to land acquisition are overly vague and broad, and if followed through, may ultimately end up harming wildlife habitat.

Issues with Specific Conservation Strategies

In the North Coast and Klamath, Bay Delta and Central Coast, and Central Valley and Sierra Nevada provinces, there is template language for a conservative strategy that reads “*Develop conservation strategies to reduce [impact] to [specific flora or fauna] habitat that may be cumulative to climate change (e.g., recreation, grazing).*” It is repeated several times, mostly in the Central Valley and Sierra Nevada section, for different impacts and/or species. The template language repeatedly

references grazing as an example impact to habitat, but often grazing is not included as a target pressure to reduce in that province and/or target area, and grazing is not listed in the “intended pressures to reduce” list for this strategy. By including grazing across the board in this template language, it implies that grazing is or will be a cumulative threat to the target area/habitat because of climate change, although grazing had not been identified as an issue in the province or target area earlier. RMAC recommends using specific examples with this template language for the target area this conservation strategy hopes to address rather than recreation and grazing in every section.

There are other places where conservation strategies state an intended pressure to reduce is “livestock, farming, and ranching,” but none of the objectives or conservation actions relate to that pressure (Conservation Strategy 7 on page 5.6-64, for example) and other conservation strategies discuss rangeland and ranching but do not include “livestock, farming, and ranching” as an intended pressure to reduce (Conservation Strategy 6 page 5.3-39, Conservation Strategy 7 page 5.3-49). There are places where conservation strategies are repeated (page 5.4-48 through 50, page 5.4-55) but organized into different categories. Conservation Strategy 3 on page 5.6-66 is a Law and Policy strategy but discusses the establishment of BMPs for managed grazing. Many of the conservation strategies are vague, repetitive, and operate from a baseline assumption that grazing has a net negative environmental impact that must be mitigated or eliminated. The conservation strategies related to grazing need to be refined.

Conservation Strategy 6 on page 5.1-50 reads “Provide outreach and education for the conservation of natural resources” and one of the objectives is “Grazing fees will be used to provide funding for recreation use.” RMAC is concerned that this new use for grazing fees will take away an important source of funding for grazing management on these lands would like more clarification on what is meant by “recreational use.”

Grazing is more than ruminants eating range – as a practice, it works to improve the land as a valued resource for environmental and economic benefit. It has positive benefits that can be maximized to improve wildlife habitat, and negative impacts that can be mitigated. However, the State Wildlife Action Plan addresses only the negative impacts, and presents vague, conflicting, and confusing conservation strategies that do not give land managers tools to respond to this Plan and implement changes for wildlife conservation.

Sincerely,

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RMAC Co-Chair

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