



March 4, 2024

Public Comments Processing
Attn: FWS-HQ-NWRS-2022-0106
U.S. Fish and Wildlife Service
Falls Church, VA 22041-3803
Submitted via the Federal eRulemaking Portal at <https://www.regulations.gov>

**RE: Docket No. FWS-HQ-NWRS-2022-0106; FXRS12610900000-212-FF09R20000]
RIN 1018-BG78 National Wildlife Refuge System; Biological Integrity, Diversity, and
Environmental Health**

To Whom It May Concern:

On behalf of Idaho's cattle ranching families, the Idaho Cattle Association submits the following comments regarding the U.S. Fish and Wildlife Service's (FWS) proposed rulemaking and policy revisions to ensure Biological Integrity, Diversity, and Environmental Health (BIDEH) on National Wildlife Refuge System (NWRS) lands. Ranchers are the stewards of the ecosystem on both the private and public land they use. They provide an effective line of defense against fire and noxious weeds, manage forage for optimum production, and are the primary protectors of open space in the private lands of the west. Because of this, we have a vested interest in this proposal and encourage you to consider the importance of continued livestock grazing on NWRS as tool that builds and supports healthy landscapes.

The rule calls for FWS to *"allow for and defer to natural processes on habitats within the Refuge System and promote conservation, restoration, and connectivity to meet refuge habitat objectives and landscape planning goals [...] When natural processes cannot meet habitat objectives or facilitate adaptation to anthropogenic change, we will use science-based management techniques [...]"* It is important the FWS acknowledges that livestock grazing is a "natural process" that provides many important benefits to the landscape.

As a wise and sustainable use of the land, managed livestock grazing fosters a good ecological balance as it promotes good grass growth, lessens the threat of catastrophic wildfires, and controls the spread of weeds. In terms of climate change concerns, grazing provides benefit here too. When cattle graze, they stimulate soil microbial activity, promoting good nitrogen storage, deeper roots, and healthier plants. Healthier soil also sequesters more carbon.



Idaho ranchers and livestock grazing permittees provide infrastructure vital to wildlife. Particularly on federal land, there are places in Idaho that, without developed water sources, wildlife would have no water for fifty miles or more. Because of water developments that grazing permittees have established and continue to maintain across public lands, wildlife have been able to flourish. Certainly, the federal government would not be able to maintain the wildlife's vital water supply on all this land without the efforts of the grazing permittees.

Livestock grazing ensures results in effective weed control. Grazing is an effective tool to manage a wide variety of forage, spurring growth of perennial grasses. Well-managed grazing has been scientifically proven to have a positive impact in decreasing invasive species like cheatgrass. The timing and intensity of grazing for such efforts requires flexibility in management that an overly prescriptive land use plans would prohibit, thereby blocking an effective conservation tool.

Foremost, livestock grazing on plays an essential role in fuels management and wildfire control. Grazing reduces the threat of catastrophic fire by reducing fine fuels. It removes the overgrowth of forage which is the primary fuel for many wildfires. Management flexibility is needed to manage the landscape in such a way to be responsive to reducing fuel loads—this rule may serve to stifle that needed flexibility. In Idaho, we have seen several areas closed to grazing and have witnessed the resulting environmental degradation. For example livestock grazing has been cancelled on state Wildlife Management Areas (WMA), whose mission is to support wildlife species and serve as principal habitat for at-risk species, similar to NWRS lands. The Craig Mountain WMA has seen multiple devastating catastrophic fires since the state took over management and removed grazing. Given the proliferation of wildfire within the WMA, due in part to land management decisions and inaction, the state is clearly missing the mark. Rather than serving as a safe harbor for species, the WMA is a tinderbox just asking for repeated catastrophic fires. This is precisely the scenario that will occur if FWS removes grazing from NWRS lands.

Moving forward, it is critical that livestock grazing is both continued on NWRS lands and expanded as a tool to assist FWS in managing those lands. Any removal of these activities would put remaining habitat at great risk of being lost—if not by catastrophic fire, then to development of the surrounding landscape.

We are particularly concerned with this statement in the proposed rule: *“We prohibit the use of agricultural practices unless they are determined necessary to meet statutory requirements, fulfill refuge purposes, and ensure biological integrity, diversity, and environmental health, and where we cannot achieve refuge management objectives through natural processes.”* As enumerated above, livestock grazing is an important conservation tool in managing the landscape for the benefit of plant and wildlife species. It is essential that FWS acknowledges it to be an acceptable practice and natural process.

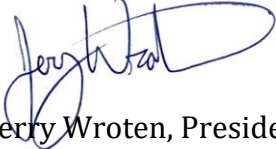
An additional concerning element of the rule is the goal to acquire more land to put in the NWRS system. The rule seeks to *“acquire lands when necessary to meet statutory requirements, fulfill refuge purposes, and ensure biological integrity, diversity, and environmental health”*. We are unequivocally opposed to the federal government's acquisition of private lands. If opportunities for productive working landscapes are reduced or diminished through land acquisition, the resulting impact is the financial unsustainability of agriculture operations which



causes the sale and development of intact landscapes and habitat. The best thing that FWS can do to support those intact landscapes is not to acquire those lands, but rather to partner with landowners in voluntary conservation efforts.

The Idaho Cattle Association appreciates the opportunity to provide comment on this proposed rule. The continued presence of livestock grazing on enhances wildlife habitat and native biological diversity and the cattle ranchers who manage the grazing provide an invaluable partner to the federal government in achieving its conservation goals. In addition to these comments, we also support the comments submitted by the Public Lands Council and National Cattlemen's Beef Association.

Sincerely,



Jerry Wroten, President
Idaho Cattle Association

