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## **ICA Statement on U.S. Fish & Wildlife Service Decision to List Slickspot Peppergrass as Threatened**

August 16, 2016

The Idaho Cattle Association (ICA) is frustrated by the recent decision by the U.S. Fish & Wildlife Service to list the slickspot peppergrass (SSPG) plant as threatened. While we have just begun our review of the listing documents, we do have some preliminary concerns. The listing of this species represents an extreme example of every fault in the implementation of the Endangered Species Act.

When the species was first petitioned to be listed years ago, ranchers worked together with federal and state agencies to develop a collaborative plan to protect the species through a Candidate Conservation Agreement. In spite of this landmark agreement, the listing process continued due to the pervasive efforts of extreme environmental organizations whose only intent in pursuing the listing was to control and limit land use, particularly livestock grazing.

While our industry has moved forward in managing the landscape to its optimum condition to make it more resilient and in implementing conservation efforts specific for slickspot peppergrass, these efforts have been completely overlooked.

It is our belief that this listing will not provide any additional protections for the plant, but rather, will serve to prevent proper management of the sage-steppe ecosystem. For example, wildfire is considered to be the most significant threat to SSPG. Many of the proposed critical habitat acres for the plant are within the boundaries of the existing Rangeland Fire Protection Associations (RFPAs). RFPAs are volunteer wildland fire fighting organizations developed and comprised of local ranchers. Combined with the state and federal government's wildfire fighting resources, the RFPAs provide the ability to respond to multiple fire starts at any point in time whereas in the past, initial firefighting efforts were limited based on fire crews availability. These RFPAs offer tangible evidence that positive action is being made on the ground with real results. However, if this listing achieves the extremist organizations' desire of removing ranchers from the landscape, the RFPAs will also go away which will remove the best and most innovative protection to SSPG to be developed.

It is our belief that adequate conservation measures are already in place to conserve SSPG, that the science behind the decision to list the species is fatally flawed, and that the species is not at risk. Based on these three factors, we believe that FWS has erred in their decision to list the species and that the listing will do more harm than good.