Emery County Public Lands Council

[redacted]

January 5, 2021

USFS
Ryan Nehl
Price, Utah 84501

Dear Mr. Nehl,
Emery County agrees with the need to change the Manti-LaSal Forest Plan, and has participated in the planning process thus far as a cooperating agency. We appreciate the opportunity to offer comments at this time. Manti LaSal Forest Draft Plan – September 2020

Concerns – San Rafael Conservation District

Section 2.16 Livestock Grazing and Range Management

Several of the issues and concerns dealing with livestock grazing that were adequately covered in the March 2020 draft of the Forest Plan, but have been stripped out of the September draft. These are important issues affecting livestock grazing and maintaining that use of the Forest. The Forest Plan will be the guiding document into the foreseeable future so these safeguards should be included in the language of the Plan.

Description and Values

Reference was made to the USU (2017) economic study in contributing to the economies of the surrounding counties. The details were included in the March draft but not in the September draft. It is important that grazing be acknowledged as an accepted and important use, as well as a major contributor to the economy of the counties. In addition, for the use of the current HM (137,986), grazing fees pay $186,281 back to the Forest budget annually. Grazing association fees and individual labor amount to an additional non-fee cost of $11.30 / HM, which is contributed by permittees in livestock management and maintenance of fences and water developments, in order to maintain the grazing privilege.

We request the following statement in the Plan be modified:

Domestic livestock grazing on Forest land contribute to the stability of the agricultural sector of surrounding economies through direct and indirect outputs, jobs and tax benefits (USU 2017), exceeding $28 million annually, and contribute 173 FTE jobs in Carbon, Emery and Sanpete counties. Livestock grazing on the Forest is the 2 nd leading driver of the local economy following energy.

Standards

ST-4 No water developments in contour trenched or furrowed areas.

Contour trenches were installed in the 1960's on thousands of acres in the Ferron and Cottonwood Creek watersheds to reduce erosion and sedimentation in Mill Site and Joes Valley reservoirs. Smooth brome and alfalfa were seeded in the trenches to stabilize them. Smooth brome is a sod forming grass and is resistant to grazing. It still persists and has stabilized the trenches.

The trenched areas are mostly on the low elevation ridges where live water is limited. Restricting or removing water developments would render large areas within the Ferron, Horn Mountain and Trail Mountain unusable for livestock grazing.

These areas have now been grazed within the grazing allotments for up to 60 years. If there is no evidence of them causing accelerated erosion, it makes no sense to put restrictions on these areas at this time. We request this standard be removed or specified to apply only to municipal watersheds.

Guidelines

Utilization rates and stubble height standards have been a contentious issue for the last 30 years.

In 1990, the Forest Service put out a directive for standards of compliance. Utilization rates and stubble heights were a quick and easy measure, and were selected as standards to measure for compliance with grazing regulations. The Range Management profession objected to the use of these monitoring tools for this purpose. It is intuitive that heavy grazing use year after year will degrade range condition. However, with the reduction in livestock numbers and season of grazing, and the use limits now imposed, the science showed there is no correlation between these measurements and ecological condition of the range and riparian areas. The season or time an area is grazed has much more influence on ecological condition than utilization rates or stubble height left at the end of the season.

The Society for Range Management came out with a position paper stating that Utilization Rates and Stubble Heights should not be used as permit standards nor objectives in an allotment management plant, but rather as guidelines of when livestock should be moved from a pasture (Rangelands 40(5): 146-151). These guidelines should be determined for individual allotments in the Annual Operating Instructions (AOI), and based on site-specific NEPA analysis and long- term condition and trend data. Management decisions (cutting livestock numbers or grazing seasons) should be based on long-term trend data on uplands and riparian condition measurements.

The underlying issue is that management decisions should be made by the manager on the ground based on local conditions, not be dictated by a single value in the forest-wide plan. A single value, even if it is stated as a guideline in the Forest Plan, becomes a defacto standard to be applied by managers, and becomes a target for litigation by environmental groups when not attained.

If the Forest requires a standard for grazing compliance, the obvious standard from a science standpoint is the ecological condition of the allotment or ecological sites within the pastures. Meeting or moving toward desired conditions would be the standard to comply with. Allowance would have to be made to account for drought or fire. If the trend was down, management changes may need to be made. This guideline would require Range Cons first to determine the desired condition for ecological sites or vegetation types, then regularly read condition and trend studies and riparian health indicators.

We request Guidelines 1 and 2 be modified as follows:

GD-1 Utilization guidelines in Annual Operating Instructions (AOI) will be developed using site-specific NEPA analyses and long-term monitoring data; in general, they will be conservative to moderate.

GD-2 Stubble height guidelines for riparian management zones in allotment AOI should be developed using long-term monitoring and riparian stability data, taking in consideration the time and duration of livestock use, and should be measured at the end of the grazing season.

Management Approach

Increasing livestock numbers

The Livestock industry is facing increasing opposition from NGO's, the public, and even within the Forest Service. Livestock grazing of public lands, and permits held by long time ranches, predate the Forest Reserves. We acknowledge that overgrazing and watershed degradation

occurred in the past. But the Livestock Industry has partnered with the Forest to heal these lands and improve ecological conditions.

The record of the reduction of livestock numbers on the forest was not included in the Assessment, despite our efforts to provide this information. We feel it is important that this information be included in the Forest Plan to show that the Livestock grazers have contributed their share in protecting and improving the range resource.

Assessment p. 128

Estimates of 100,000 animals grazed on the LaSal Reserve in the late 1800's.

After establishment of the Manti Forest Reserve … 200,000 sheep and 28,000 cattle were permitted.

The 1986 Forest Plan permitted 175,334 AUMs or about 20,700 cattle and 85,000 sheep.

Since 1986, permitted AUMs have declined to 137,986 (21% reduction)

Currently, permit obligations and estimated grazing capacity are close to balancing.

We submitted the following statement several times, but it was not included in the Assessment: Substantial cuts in livestock numbers and season of use (40-60%) were taken during the 1960's and 1970's to improve range condition, and numerous range improvement projects were implemented, with the Forest providing materials and permittees providing the labor. Livestock use was brought in line with the carrying capacity of the ranges.

A major component of the 1986 Forest Plan was that when the results of these projects and management showed improvement in range condition, some of the cuts in livestock use would be restored (p. II-39). This never occurred.

We would like this statement from the March 2020 Draft reinstated in the Plan:

HMs should be retained at current permitted levels when rangeland conditions are meeting or moving toward desired conditions. Increases in HMs would be appropriate when desired conditions are currently being met and analysis has indicated that the increase would continue to meet desired conditions while taking advantage of an increase in available forage.

Flexibility in season of use and exchange of use

The Forest Service is using the concept of Adaptive Management to manage the Forest resources. In the past, the "on" and "off" dates of allotments were very rigid, except in drought when permittees were asked to bring their livestock home early. To be truly adaptive to the annual climatic variations, the local range conservationists should have the flexibility to adjust the "on" and "off" dates if additional forage is available early in the season, or if abundant forage is available at the end of the season.

Exchange of use with sheep allotments should also be considered. Multi-species grazing is a proven management practice to improve range condition. Targeted grazing is also effective in suppressing undesirable vegetation. In addition, where the poisonous larkspur is present, grazing sheep before cattle can greatly reduce the risk of cattle poisoning (sheep are resistant to larkspur poisoning). Therefore, the local range conservationist should have the flexibility to utilize exchange of use when it benefits the resource.
MA-4 Flexibility in season of use and exchange of use may be considered when it is not detrimental to the resource.

Resubmit Comments made during Assessment

2.6.2 Deciduous Forests

Description and Values

It would be important to distinguish Stable and Seral Aspen types here, since management of the two types differ.
(Rogers and Sinclair, 2016, Quaking Aspen in Utah: Integrating Recent Science with Management; Rangelands 38 (5): 266-272)

Desired Conditions

2 & 3 don't apply to Seral aspen where conifers dominate in later successional stages.

Management Approach

3 – Upland aspen should be Seral aspen in this context.

2.6.3 Woodlands

Description and Values

There are two ecological processes here that are confused and sometimes contradictory: invasion or expansion of P/J into former shrubland and savannahs, and succession towards late old growth stands. It would be important to define the 3 types of P/J (Romme 2009), since management objectives are different. Management should be directed to reduce expansion into shrublands and savannahs. Old growth characteristics of Persistent P/J should probably be maintained.
(W.H. Romme et al, 2009; Historical and Modern disturbance Regimes, Stand structures and Landscape Dynamics in Pinon – Juniper Vegetation in the Western United States. Rangeland Ecology and Management 62:203-222)

Desired Conditions

The role of ecological succession is not acknowledged in attaining desired conditions.

4. Need to acknowledge the successional process where these plants (shrubs, forbs and grasses) are found in the early stages, and that disturbance is needed periodically to reset the successional clock.

5 & amp;

7 These deal with Persistent P/J only, not with wooded shrublands or savannahs.

8. This deals with early to mid seral state and can only be maintained by periodic disturbance.

9. Poorly worded. These disturbances are necessary to periodically reset the successional clock to attain the stated proportions of seral states.

Objectives

1 Treating 50 acres / 10 years is woefully short of that needed to counter the rate of expansion and infilling. The proposed Mahogany Point Wildlife Habitat Improvement Project on Horn Mountain alone will treat 1755 acres.

2.6.4 Shrublands

Desired Conditions

4. Fire frequency of 100 years is much too low. Frequent fires are necessary to maintain the proportion of seral stages in Table 7.

Management Approach

1 This requires frequent disturbance to retain or enhance a vigorous understory community.

2.6.8 Native Plant Materials

This section expresses a political agenda rather than current science. It does not portray a balanced management approach that should go into a long-term Forest Plan.

The Society for Range Management Position Statement on Native Plant Species offers a balanced approach for selecting seed mixes.

"Prefer native plant species, but allow use of introduced plant species to protect rangeland resources and meet management goals where the use of natives is not suitable or possible."

Tone this section down to a reasonable approach. Let on-the-ground managers determine the appropriate seed mix (native and introduced) for the specific sites.

Description and Values

Appropriate introduced species are often more effective in restoring degraded landscapes, especially those exposed to accelerated erosion, and are less expensive.

If you have any questions regarding the content of this letter, please contact us for further discussion.

Sincerly,
Emery County Public Lands Council

Rod Player