Re: Response to Draft Environmental Impact Statement for Ashley National Forest Plan

To whom it may concern:

My name is Cody Jenkins and I am writing to comment specifically on certain aspects of the Ashley National Forest revised forest plan and the corresponding Draft Environmental Impact Statement.

I appreciate the effort of the Forest Service to provide for proper management of the forest and its resources. I have lived in Vernal, Utah all of my life, as has both my father, grandfather, and great-grandfather. We have four generations who have made this area our home and relied upon the forest for its water, forage, and other resources as our livelihood. I hold a permit for livestock grazing on the forest and my family has been grazing there for more than 100 years. We have been a part of the forest’s history (particularly in the Taylor Mountain and Brush Creek areas). We are part of its current activities and desire to continue to do so in the future. Members of my family and I have been a part of the water districts and water companies that have shaped many of the water resources that others now benefit for irrigation, recreation, and municipal uses.

In connection with this, I am very interested in the future of the Ashley National Forest and desire that the revised plan of the Forest Service may allow for continued use and the benefits of grazing and water developments. I hope that you will take my following comments in serious consideration as you move forward with your plan.

**Limitations on Grazing Utilization**

In Appendix E, or the proposed plan you state the following:

*Appendix E. Ashley National Forest Land Management Plan*

*Chapter 2. Forestwide Direction*

*FW-GL-LGR Guidelines*

*01 To ensure sustainability and resiliency of forage resources limit utilization of key forage species to no greater than 50 percent of current year’s growth, unless monitoring demonstrates a different allowable use level is appropriate.*

*02 To ensure sustainability and resiliency of forage resources in riparian areas, leave a four-inch or greater stubble height of palatable herbaceous species at the end of the grazing season between greenline and bank full of stream systems, unless monitoring demonstrates a more appropriate stubble height.*

I am very concerned about the standardization and creation of a “one-fits-all” approach to percentage of utilization or requiring a specific stubble height. While I fully support the proper management of grazing and ensuring our grazing lands are not overused, the Ashley National Forest has a very broad range of lands, vegetation types, elevations, slopes, aspects, and environments. To state that one standard fits the entire forest seems very flawed. Some types of range will support more than 50% utilization, while others may indeed need that amount remaining.

Some riparian areas do not flow into streams and are actually man-made such as reservoirs, ponds, and catch basins. Some were constructed for the very intent of providing water to livestock and wildlife, and do not drain elsewhere.

* Where did the 50% utilization come from and why is not a more sensible and scientifically justifiable approach being considered?
* Where did the 4-inch stubble height requirement for a riparian area come from and what justification is there for its use in every riparian area?

I run my livestock at different elevations throughout the different seasons on the forest. There is arguably a much different proper amount of use based on the different types of forage and elevation. As a farmer, I also can state from experience that different plants also have different abilities and responses to amounts of utilization. In fact, sometimes grazing can be used to get rid of undesired plants based on the timing and amount being grazed.

My concern is that in your plan you seem to suggest that one management practice (leaving a specific percentage of utilization) is the solution to ensuring proper management of the plants and forage. I would argue that is an incorrect approach.

I highly encourage you to seek more sound guidelines that would allow the flexibility of considering independently the actual health of the range and its resources, rather than placing this blanket statement that may be far too conservative in some areas.

Because of this, I encourage you to pursue the grazing differences outlined in Alternative A and D rather than the more restrictive guidelines shown in Alternative B, and especially Alternative C.

In your analysis, you state in chapter 3:

*“Most rangeland on the Ashley National Forest is in good condition, and vegetation trends appear to be favorable and sustainable; however, some allotments have experienced an increase in invasive annuals, which may lead to a decline in forage for cattle and a decline in ecological condition.”*

Also,

*“In 2011, rangelands on the Ashley National Forest were evaluated using watershed condition data. These data quantify such factors as vegetation condition, invasive species threats, and the overall condition of rangelands. Of the 123 subwatersheds analyzed, 113 were reported to be in good condition, 9 in fair condition, and 1 in poor condition.”*

While that assessment does not give a perfect condition, it does show that overall, the rangelands are in good condition based on the standards set forth in your 1986 plan which does not add these additional restrictions. It also shows that there is some room for improvement. This seems to then only make natural sense to work with us as livestock permittees. This includes identifying the problems and making changes on a site-specific basis, rather than implementing a tighter restriction across all types of rangelands and the entire forest.

Please take these thoughts into consideration as you move forward into your next steps with creating your plan.

Finally, I would like to make one other observation and suggestion when it comes to your assessment of the effects of livestock grazing. In most sections of your analysis, it seems that the focus of attention, if not the entire discussion, is solely on identifying negative effects that could be part of livestock grazing. The comparison you make between alternatives seems much about how one alternative might have less negative effects than others caused by livestock grazing.

As one who has been part of grazing livestock all of my life, I believe you have missed some of the important benefits that livestock grazing bring to the forest. For instance, there is research through university extensions and agricultural communities that talk not just about the economic benefits of providing a food supply and funds to communities, but rather to the health of the land itself.

I have seen and I am certain that if you look you will find studies that show how livestock grazing is an important component of reducing the chances for wildfire. This is from the reduction of the highly combustible grass and other plants when they are cured and ripe for spreading a fire. One such study in California particularly points out the effects on livestock grazing in reducing the risk of fire. “Without grazing we would have hundreds to thousands of additional of pounds/acre of fine fuels on the landscape, potentially leading to larger and more severe fires” (Ratcliff, Rao, Barry et. al 2020).

In addition, it is not just about how grazing can reduce risk of a wildfire, but then how does this reduction in risk benefit our soils, plants and water? Is this not a positive effect of livestock grazing that should be identified in each of your other areas of assessment? Surely there should be a discussion how livestock grazing can benefit the forest by reducing these potential risks.

There are also many other positive benefits of livestock grazing that a simple search of articles could bring additional positive effects of livestock grazing to each of these other categories. I would encourage showing these benefits and comparisons in addition to your comparison of negative effects.

Thank you for you time and consideration of my comments.

If I can provide additional information or clarification, please let me know.

Sincerely,

Cody William Jenkins

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st Land Management Plan

Chapter 2. Forestwide Direction

FW-GL-LGR Guidelines

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Chapter 3. Management Area Direction

Domestic Livestock Grazing

**Wild Rivers:** Domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable, including the areas’ essentially primitive character.

**Scenic Rivers:** Domestic livestock grazing should be managed to protect outstandingly remarkable values. Existing structures may be maintained. New facilities may be developed so long as they maintain the values for which a river was eligible or suitable, including the areas’ largely undeveloped character.

**Recreational Rivers:** Domestic livestock grazing should be managed to protect identified river values. Existing structures may be maintained. New facilities may be developed to facilitate livestock management so long as they maintain the values for which a river was found eligible or suitable.

Chapter 4. Plan Monitoring Program

Livestock Grazing

* Are allotments meeting forest plan and allotment management plan utilization guidelines?
* Utilization of key forage species (≤ 50 percent or other allowable use level in AMP), and stubble height (≤ 4 inch or other allowable use level in AMP) between greenline and bank-full streams systems
* ASF studies inventory; ASF utilization monitoring

Attachment B. Management Approaches

Flaming Gorge National Recreation Area

**05** Schedule livestock grazing outside the Memorial Day to Labor Day high visitor use period in areas of heavy public use. Normally, do not allow livestock in designated recreation sites.

DEIS Chapter 2. Alternatives, Including the Proposed Action (Alternatives)

**Vegetation Management, Timber Harvest, and Sustainable Ecosystems**

**Alternative A**

For livestock grazing, forage utilization and stubble height under alternative A would be determined based on site-specific conditions to meet land health standards and based on individual AMPs and permit terms and conditions.

**Alternative B**

Under alternative B, forage for livestock grazing would have specific utilization levels included in management (50 percent) as well as 4-inch stubble height guidelines to provide criteria to help meet desired conditions for terrestrial vegetation.

In addition, alternative B includes plan direction for sheep or goat grazing permits to be voluntarily waived without preference, including potential allotment closures, timing adjustments, conversion to cattle and horse allotments, utilization as a cattle and horse forage reserve, or other options that provide separation or pathogen transfer mitigation.

**Alternative C**

Vegetation Management, Timber Harvest, and Sustainable Ecosystems

In addition, when domestic sheet or goat grazing permits are voluntarily waived without preference, and if the allotment does not provide separation from bighorn sheet, the allotments would be closed to provide separation between domestic sheep and goats and bighorn sheep.

Conflicts from other land uses with recreation would be reduced under this alternative because timber production and grazing would not be permitted in destination recreation areas.

Forage for livestock would be limited to a level of 40 percent utilization and a stubble height of 4 inches. For bighorn sheep, this alternative would include additional and more stringent plan direction for separation from domestic sheep. New domestic sheep or goat allotments would not be permitted unless separation from wild bighorn sheep is demonstrated.

**Alternative D**

Alternative D would have the fewest restrictions on timber harvest, with the most acres suitable for timber production and the greatest harvest volume. In addition, this alternative would encourage harvesting in areas not suitable for production to accomplish other resource objectives, resulting in an increased harvest. Vegetation management under alternative D would support the highest level of treatment per acre over the life of the plan. For livestock grazing, forage utilization and stubble height under alternative D would be determined based on site-specific conditions to meet desired conditions, as under alternative A.

Under alternative D, management for wildlife would emphasize support for wildlife habitat while limiting the impacts on other land uses. Plan components for soil and water would provide fewer limitations on use compared with other action alternatives. No additional restrictions would be in place for managing bighorn sheep.

**Table 2-2. Summary of Plan Content Responding to Forestwide Issues By Alternative**

|  |  |  |  |  |
| --- | --- | --- | --- | --- |
| **Resource** | **Alternative A** | **Alternative B** | **Alternative C** | **Alternative D** |
| **Vegetation Management, Timber Harvest, and Sustainable Ecosystems** | | | | |
| **Livestock Grazing** | | | | |
| Livestock forage utilization and stubble height guidelines | Utilization and stubble height based on land health standards | 50 percent utilization for livestock and 4-inch stubble height guidelines with exceptions where a different height will meet desired conditions | 40 percent utilization for livestock and 4-inch stubble height guidelines | Utilization and stubble height based on desired conditions |
| Permitted head months (HMs)1 | 76,922 | 76,922 | 76,812 | 76,922 |
| Permitted grazing (acres)1 | 919,700 | 919,700 | 906,700 | 919,700 |
| **Destination Recreation Areas** | | | | |
| Grazing (permitted acres) in destination recreation areas | No equivalent destination recreation area under alternative A | Permitted (13,000 acres currently have active allotments) | Not permitted | Permitted (13,000 acres currently have active allotments) |
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Soils

Effects from Livestock Grazing Management

**Alternative A**

There are no forest wide specific forage utilization or stubble height guidelines under alternative A, guidelines are determined at the allotment level. Current range conditions for sensitive soils and soils on moderate to steep slopes in allotment areas would continue under alternative A. The soil condition may be altered in areas where rangeland conditions are deteriorating, as described under “Environmental Consequences for Soils Common to All Alternatives.” ***The desired condition for livestock grazing management under alternative A is to optimize forage to the extent that it is cost effective and is balanced with other resources. This desired condition is being met in rangeland areas, except where soil conditions are deteriorating.***

**Alternative B**

Alternative B would provide specific utilization and stubble height guidelines that could be increased or decreased depending on the soil condition and other rangeland conditions to meet desired conditions. Compared with alternative A, these guidelines would better maintain rangeland conditions, including soil condition, as described under “Environmental Consequences for Soils Common to All Alternatives.”

**Alternative C**

Alternative C would lower utilization, compared with alternative A; not allow for modifications, as compared with alternative B, and likely ensure rangeland desired conditions are maintained. This could reduce grazing in some areas where utilization consistently exceeds 50 percent and stubble height exceeds 4 inches. Overall, alternative C would reduce impacts on the soil condition, including soil compaction and displacement, vegetation cover loss, surface runoff, and soil erosion, in concentrated use areas.

**Alternative D**

Similar to alternative A, alternative D would not include specific utilization or stubble height guidelines. Impacts on soils under alternative D would be the same as those described under alternative A.

Page 55 Chapter 3

***Wildfire also can create hydrophobic soil surfaces that worsen post-fire erosion rates.***

Page 66 Watersheds and Aquatic and Riparian Ecosystems

Citation of Neff et al 2005 seems to insinuate that historical grazing has decreased vegetation cover on the Ashley National Forest based on the lead in sentence to the paragraph. However the study cited took place in southeast Utah where climate and soils may be much different than those found in the northern part of the state and at higher elevations as found on the Ashley National Forest.

Watersheds and Aquatic and Riparian Ecosystems

**Effects from Livestock Grazing**

**This section seems to focus solely on the adverse effects of livestock grazing without acknowledging any ecological benefits that occur. It seems the author may be ignoring certain other literature and studies that identify the potential benefits as well as potential adverse effects.**

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Chapter 3 Affectede Environment and environmental Consequences (Livestock Grazing)

“Most rangeland on the Ashley National Forest is in good condition, and vegetation trends appear to be favorable and sustainable; however, some allotments have experienced an increase in invasive annuals, which may lead to a decline in forage for cattle and a decline in ecological condition.

In 2011, rangelands on the Ashley National Forest were evaluated using watershed condition data. These data quantify such factors as vegetation condition, invasive species threats, and the overall condition of rangelands. Of the 123 subwatersheds analyzed, 113 were reported to be in good condition, 9 in fair condition, and 1 in poor condition.