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First name: Roger

Last name: Barton

Organization: San Rafael Conservation District

Title:

Comments: Kyle,

Attached are the comments for the FS Plan being revised at this time. These comments are the ones Mike and I presented to you in December. Also included are letters of support from SRCD, Price River CD, Green River CD, San Juan CD. We are in the process of getting support from Sanpete CD and County, Emery County (already supports), Carbon County, San Juan County and Grand County. Those letters of support will be forwarded to you as I receive them.

Roger Barton

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 AUM[rsquo]s), grazing fees (\$1.35) pay \$186,281 back to the Forest budget annually. Grazing association fees and individual labor amount to an additional non-fee cost of \$30 / AUM (Tanaka 2018), which is contributed by permittees in livestock management and maintenance of fences and water developments, in order to maintain the grazing privilege.

The USU study estimated the contribution to local economies in the North Zone was \$28 million or \$267 / AUM. Extrapolating this value of an AUM to the South Zone would amount to an additional \$8 million, for a total contribution to local economies from grazing on the Forest of \$36 million. We suggest the USU Study be included in an Appendix to the Plan along with the explanation that the value of grazing was extrapolated to the South Zone to obtain a total figure for the entire Forest. We would also like to acknowledge the grazing fee and non-fee costs for the privilege of grazing on the Forest.

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 \$36 million annually, and is the 2nd 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 1960s 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 have 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 issued 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 as compliance standards. Several papers came out in various journals decrying the use of these monitoring tools as permit standards, and an Interagency Technical Reference (1734-3) was developed cooperatively by the Forest Service, BLM, NRCS and Cooperative Extension Service for their proper use.

A symposium was held during the 1997 SRM annual meeting inviting Range researchers and Agency Administrators to evaluate Utilization Standards. WCC 1998, Utilization Standards Report (Oregon State Univ. Exp. Sta. Bull 682, 1998)

The Society for Range Management came out with a position paper in 1998 stating that "Utilization Rates and Stubble Heights should not be used as permit standards nor objectives in an allotment management plan."

A Review Team was commissioned in 2003 by Intermountain Region 4 Forester Jack G. Troyer and BLM Idaho State Director K. Lynn Bennet, to evaluate the use of stubble height standards for Allotment Management Plans (Stubble Height Review Team, 2006). Subsequently, each administrator sent out memos adopting and implementing the review team recommendations to cease using Utilization and Stubble Heights as compliance standards (Bureau of Land Management, 2005), (USDA Forest Service, 2005a). Southwest Region 3 Forester Harv Forsgren also issued an instruction memorandum to implement these findings (USDA Forest Service, 2005b).

The issue arose again following the 2012 Planning Rule as new Forest Plans began. The SRM Rangeland Assessment and Monitoring Committee reiterated the SRM Position Statement and stated (Rangelands 40 (5): 146-151, 2018):

1. "Specific limits on utilization or residual measurements should not be included as standards or objectives to be met in land use plans, resource management plan, annual operating instructions or as part of the terms and

conditions of grazing permits.

2. [hellip]This does not mean that utilization or residue measurements should not be used as an annual indicator to help guide grazing use and planning.

3. Utilization or residue measurements should not be used as guidelines without specifying how they relate to the management objective, the method used, the location and species to be measured, the season of measurement, the qualifications of those making the measurements, and how the data will be interpreted as a basis for management decisions and by whom. Without this information, such measurements are of little value and subject to misuse.[rdquo]

Another 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 as determined by long-term condition and trend studies and annual indicators such as Rangeland Health. Meeting or moving toward desired condition would be the standard to comply with.

We request the statement from the March 2020 Draft Forest Plan be reinstated and that Guidelines 1 and 2 be modified as follows:

Utilization rates and stubble height levels will not be used as permit standards nor an objective in allotment management plans (AMP), but rather as indicators of management; they are end-of-season targets to aim for in the annual operating instructions (AOI).

GD-1 Utilization guidelines in Annual Operating Instructions (AOI) will be developed using long-term monitoring data and annual indicators such as Rangeland Health analyses, taking in consideration the time and duration of livestock use; 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.

Burkhardt recommended specific grazing strategies for grazing riparian areas. (Grazing Utilization Limits. Rangelands 19 (June): p.8-9, 1977). We suggest these be considered when writing individual AOI[rsquo]s.

Large Meadow Systems:

Early season grazing and hot season rest or summer use rotation. Large meadow complexes should be used and managed independent from the surrounding uplands.

Narrow Wooded Stream Bottoms within mountain canyons:

These are concentration areas and enforcement of conservative use limits cannot effectively be accomplished. Apply cool season or early grazing and hot season rest or rotation. Develop upland water sources and herding to remove animals from bottoms.

Upland Springs:

Fence and pipe a portion of the water to upland water troughs.

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 [hellip] 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 [ldquo]on[rdquo] and [ldquo]off[rdquo] 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 [ldquo]on[rdquo] and [ldquo]off[rdquo] 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.

We would also like to 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 [ndash] 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 [ndash] 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 that these plants (shrubs, forbs and grasses) are found in the early stages, and that disturbance is needed periodically to reset the successional clock.

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

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

[ldquo]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.[rdquo]

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.

SEE LETTER SUBMISSION: Letter of Support of Commenter Letter from Green River Conservation District

SEE LETTER SUBMISSION: Letter of Support of Commenter Letter from Price River Watershed Conservation District

SEE LETTER SUBMISSION: Letter of support of Commenter Letter from San Juan County Conservation District