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First name: Cody and Gail

Last name: Jenkins

Organization:

Title:

Comments: February 11, 2022

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, 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 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 your time and consideration of my comments.

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

Sincerely,

Cody William Jenkins

Gail Jenkins

Additional comments found in commenter's attachment:

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. Page 249 Chapter 3 Affected 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.

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