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Title:
Comments: Manti-La Sal National Forest Scoping Comments

Dear members of the Manti-La Sal Forest Service,

I have read through your revised land management plan for the Manti-La Sal National Forest, and would like to articulate several concerns I have regarding section 2.1.2 (Riparian Management Zones), and section 2.16 (Livestock Grazing and Range Management). I will also

comment on how I understand the two to relate.

Under section 2.1.2, your proposal states that the desired conditions for riparian areas appear as follows:

1. Upland watershed, soil, and vegetation conditions contribute to healthy, resilient riparian areas, wetlands, and stream channels.

2. Riparian ecosystems and their associated plant community compositions provide key functions, including streambank stability, sediment retention, temperature regulation, floodplain function, as well as proper groundwater recharge, storage, delivery and water table maintenance.

3. Riparian ecosystems are resilient and withstand disturbance from natural and management activities, including flood, fire, drought, changes in timing and frequency of runoff, recreation, grazing, and in-stream developments.

4. Riparian areas meet the needs of resident aquatic species, terrestrial species, and migratory birds.

5. Plant communities along natural perennial waterbodies are stable healthy, vigorous, and self-perpetuating with a diverse composition of desired species that includes key herbaceous and woody plants.

The proposal goes on to state a few other qualifications as well, but these are the ones of concern to me, because on the basis of grazing intensity studies utilized by the organization who submitted their conservative alternative to you[mdash]namely this grazing study conducted by Jerry L. Holechek, Hilton Gomez, Francisco Molinar, and Dee Galt[mdash]the feasibility of meeting the desired riparian conditions will remain unattainable in conjunction with the livestock grazing management plan the proposal articulates.

The Forest service proposal on livestock grazing states that it seeks to implement [ldquo]systems and practices [that] are designed to support terrestrial vegetation, riparian, soils, socioeconomics and other resource plan components,[rdquo] and [ldquo]incorporates science and ecological conditions to inform decisions and react to changing conditions such as drought.[rdquo] It also claims to [ldquo]emphasize ecological resilience and watershed health[mdash][rdquo] a vague statement at best. Accomplishment of these goals, it reads, will occur by grazing to a moderate degree ([ldquo]no greater than 50 percent of current year[rsquo]s growth[hellip][rdquo]) then concludes with the vague and therefore plastic caveat: [ldquo][hellip]except where long-term monitoring demonstrates a different allowable use level that will meet desired conditions for soils and terrestrial vegetation.[rdquo] In order to know that the value to support terrestrial vegetation and riparian ecosystems will be upheld, especially in times of drought, I ask for a grazing standard with a definite rather than flexible maximum grazing intensity level, and that said intensity level be conservative (as suggested in the alternative) rather than moderate to heavy[mdash]particularly in riparian areas.

On the basis of the Holechek study, advocating for conservative rather than moderate intensity levels in grazing will prove imperative in the Forest Service[rsquo]s ability to accomplish it[rsquo]s own desired riparian and terrestrial ecological conditions, as well as sustain the long-term socioeconomic benefits of grazing in times of drought. Holechek defines conservative grazing as [ldquo]involving about 35% use of forage.[rdquo] In a series of twenty studies, Holechek found that while [ldquo]moderate stocking rates gave 31% higher net financial returns per acre than heavy stocking and 11% higher financial returns than light stocking,[rdquo] in drought conditions [ldquo]conservative stocking is one of the surest ways to minimize financial loss.[rdquo] Holecheck states that analysis of the studies concluded that [ldquo]when severe drought occurs conservative stocking will give 30[ndash]60% higher net returns than moderate stocking.[rdquo]

Besides the economic incentives to reduce grazing intensity to conservative levels (35% as opposed to 50%+), I am concerned that the current grazing standards proposed[mdash]moderate intensity grazing and the guideline that [ldquo]a four-inch or greater stubble height of herbaceous species should be present within riparian management zones at the end of the grazing season[mdash][rdquo] are inadequate to meet your desired riparian ecological standards. While a four-inch stubble height may be adequate to meet the management plan[rsquo]s commitment to streambank stability, many of the other conditions remain unattainable while moderate grazing standards are in place. The proposed livestock management approach and guidelines do state that [ldquo]management activities, including but not limited to grazing, [hellip] should only occur when they cause minimal streambank vegetation loss and canopy cover loss.[rdquo] A four-inch stubble standard, however, constitutes more than [ldquo]minimal streambank vegetation loss.[rdquo] At four-inches in height, habitat and cover for riparian species is lost, and with it the biodiversity they bring (see pt. 4 of 2.1.2 for a visual of why this violates the Forest Service[rsquo]s own standards); soil moisture content is depleted (see pt. 2 of 2.1.2 for a visual of why this violates the Forest Service[rsquo]s own standards); and vegetation (riparian grasses, sedges, rushes, and forbs in particular) becomes hereditarily stunted in height. These ecological considerations further incentivize the adoption of the conservative alternative[rsquo]s conservative grazing intensity standard.

Sincerely and with gratitude,

Nicola Caddell