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First name: Reya

Last name: Fore

Organization:

Title:

Comments: To Whom It May Concern:

I have some comments for the Manti-La Sal National Forest draft plan. Thank you for working hard to maintain our natural resources and the beauty and biodiversity there. I understand that grazing is important as both a western tradition and part of the economy. My comments are about the way grazing would be managed in the suggested forest plan. I am worried that the management practices suggested could harm the La Sal ecosystem and the species within it.

On page 81 of the draft plan it is stated that the desired condition 01 is "livestock grazing and associated management activities are compatible with ecological functions and processes and support sustainable levels of livestock grazing that contribute to the agricultural economy, local employment, and support traditional lifestyles." I am concerned that a four-inch stubble height of herbaceous species in the riparian zone is not enough to do this. Small mammals and birds require taller riparian grass to have cover and food. Four inches is the minimum to keep the stream banks together, and does not account for the habitat lost when the grass is so short. I recommend that there be some riparian areas left with at least 12-inch-tall grass at the end of the grazing season.

Additionally, I recommend for cattle to be completely kept out of some riparian areas. This could be done with fencing or with range riding. Cattle spending time grazing and trampling near rivers leads to incised channels, which allow water to run out of the area much quicker instead of being absorbed into the soil. In an arid climate the ecosystem relies on keeping water around that arrives as precipitation. Cows in riparian areas makes this difficult. Considering our changing climate could lead to more drought and heat in the Manti-La Sal area, incised channels and loss of water retention capabilities is even more concerning.

On page 80, standard 02 says "livestock management activities shall not adversely impact At-Risk Plant species and At-Risk Animal habitats." These At-Risk Plants include alpine species. On page 45, guideline 02 says "disturbance is minimized in exposed rock outcroppings and bedrock, and rims where At-Risk plant species occur." I do not think that these standards and guidelines can be met while mountain goats are managed for a growing herd, or any herd at all. Mountain goats are not native, and have the ability to roam and forage in the places that At-Risk alpine plant species live. I am not sure what should be done with the goats, but I do not think the answer is to continue to 'monitor' the growing herd as part of research. We do not need to keep studying what happens-they are causing damage to a delicate ecosystem.

On page 80, guideline 01 states "utilization of key forage species should be no greater than 50 percent of current year's growth, except where long term monitoring demonstrates a different allowable use level that will meet desired conditions for soils and terrestrial vegetation." I recommend that 30-35 percent utilization be adopted. According to Holecheck et. al's review of the literature "Grazing Studies: What We've Learned" 30-35 percent use is "needed for improvement in rangeland vegetation." He also states that "stocking rate reductions from heavy to conservative, have much higher have much higher probability of increasing grazing capacity, reducing risk, increasing financial returns, and reducing erosion." Reducing the use of grazing allotments by cutting down on AUMs or by moving cattle more, increases financial gain for the ranchers as well as improves ecosystem health. If we want to have sustainable ranching in Manti-La Sal national forest for years to come, especially in our changing climate, we need to reduce grazing now.

I also recommend taking some allotments out of grazing production for the foreseeable future. This would provide more space for the native species to live free from any cattle impacts, and allow crypto biotic soil to develop

without getting trampled. Cryptobiotic soil is important for soil retention during rain events, and takes decades for the dark cyanobacteria to develop in some cases. This can be wiped away in an instant if stepped on by free roaming cows. If we created more productive rangeland by utilizing less of the forage species each grazing season, we could take some grazing allotments out of use and still meet similar financial gains. This would reduce our ecosystem impact while not negatively altering the cattle economy.

Thank you for considering my comment. I appreciate your dedication to rural economy and ecosystem health. Reducing AUMs and the forage that is grazed will serve both the economy and ecosystem.