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Comments: I write today as a concerned citizen who cares deeply for the health and wellbeing of Utah's forests. I would like to focus my comment on livestock grazing, because I have some qualms with this section of the Revised Land Management Plan for the Manti-La Sal National Forest. Within the subject of livestock grazing, my concern specifically is with the impact that livestock have on riparian areas. I am passionate about finding a balance between all the different uses of the forest: hiking, hunting, off-road vehicles, wildlife, grazing, etc. but I believe that riparian areas are one place where compromise just can't be made.

Healthy riparian areas are critical to supporting forest ecosystems. Under the Watershed and Aquatic Resources section, the Draft Plan states that streams have many ecological benefits. They support incredible biodiversity in the form of grasses and other grass-like plants, shrubs and trees, fish and other aquatic organisms, and many species of rodents, mammals, and reptiles that rely on riparian habitat. Healthy streams and wetlands absorb rainwater and snowmelt and act as a method of flood control. This water can recharge groundwater, which, in an era of drought is incredibly important. Riparian zones are also important locations for nutrient cycling, which can only happen if animal and plant populations are healthy. The Draft Plan lists a desired condition of the National Forest as having Riparian ecosystems that are able to provide these key functions. Many of the objectives and standards related to livestock grazing in the current Draft Plan do support this goal, but I believe that they aren't enough to ensure riparian health.

The current Draft Plan lists a guideline that key forage species should be grazed no more than 50% of the current year's growth and 4" of stubble height should be left at the end of the grazing season. The issue is that the 4" guideline is considered heavy grazing for upland plants. For riparian plants, that frequently grow upwards of 18", this is extremely heavy grazing, often beyond the point of recovery for the plant. There should be a different standard for riparian vegetation, in order to maintain the integrity of stream banks. The Conservation Alternative posits a conservative guideline of using only 30% of palatable native herbaceous species. The other problem with the 50% 4" guideline is that it leaves an exception for if long term monitoring demonstrates that a different stubble height or percent measurement is acceptable to meet desired conditions. This introduces a lot of ambiguity into the system and allows for a subjective judgement that might be influenced by pressure from the rancher holding the permit to graze that land. A standard should be set that, under the impending threat of drought and climate change, is conservative, and isn't subject to change due to political pressure.

Another standard proposed by the Conservation Alternative is that livestock will not be permitted to enter a pasture for the season until all fences are ensured to be in functioning condition. The current Draft Plan does not require this, and it has resulted in cattle wandering into springs and riparian areas where they are not authorized to be. The implementation of this standard would mitigate a lot of damage to riparian areas due to wayward cattle.

Currently, there are no limits on new water developments under the Draft Plan. Under the Conservation Alternative, a standard would be imposed ensuring that no new water troughs, stock ponds or other development of springs and creeks would be permitted for livestock use without an equal decrease in volume of extraction elsewhere on the allotment. At a time when droughts and rising temperatures are leading to a decline in water availability, this regulation would ensure that more water stays in streams to maintain their health and to leave water available for other uses.

I was recently doing some research on Monroe Mountain in the Fish Lake National Forest, an area also in Utah that has been heavily impacted by cattle grazing. I, along with several other college students, conducted a small study comparing a section of a creek that had been protected from cattle by an enclosure for several years, and a section of that same creek that had been open to grazing. The results of our study were shockingly clear, the section of creek that was accessible to cattle was much more deeply incised than the enclosed section and its banks held far less vegetation. Walking around inside the enclosure, I noticed that the creek was clear and cold and the area surrounding it was lush with verdant green vegetation. The air was sweet and fresh with the scent of wild mint. The area just outside of the enclosure, however, was very different. The creek was wide and muddy,

and the water was stagnant and stank of cow feces. The banks were eroded by the heavy footprints of cattle and with very little vegetation left to hold them together, were caving into the creek. The ground was mostly bare, but for a few mowed down clumps of grass and abundant cow patties.

The question I ask of you is this: which riparian area would you rather see within the Manti-La Sal National Forest? The sweet, green creek rich with biodiversity, or the muddy and desolate cattle-trampled creek? I sincerely hope that you would choose the former and urge you to consider that the conservative grazing solutions presented by the Conservation Alternative provide the best path towards achieving that future.