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Title:

Comments: I am writing to express my concern with the Livestock Grazing and Range Management regulations of the Revised Land Management Plan for the Manti LaSal National Forest. I am especially concerned about grazing within riparian areas and grazing regulations in relation to climate change. I believe that these ecosystems hold great value to the natural and human world, and I want to see them thrive into the future. As stated on page 17 of the Revised Land Management Plan, "Riparian areas are the richest habitat type in terms of species diversity and wildlife abundance in Utah". These areas of high species diversity provide habitat for a wide range of fauna and ecosystem resilience. They are increasingly important in the face of climate change and more drought years, as intact riparian areas slow down high flows of water and allow it to infiltrate into the ground to provide groundwater throughout the season when rain patterns are more and more unpredictable. Domestic ungulates like sheep and cattle flock to riparian areas and can cause great harm to these areas. They compact the soil when stepping on it which leads to lower infiltration capacity, and effectively reduces the size of the riparian area. When travelling on streambanks to get water, sheep and cattle collapse the edges of the bank, preventing overhangs and vegetation loss that provide stream stability and resilience. This also alters the stream morphology and prevents it from taking its natural course. Finally, grazing within riparian areas often does not comply to the 4 inch stubble height regulation, which diminishes regrowth potential and vegetation diversity. The Southwest United States have been in mega-drought the past 20 years, with three out of the last four (2018, 2020, 2021) being considered extreme drought. Additionally, rainfall patterns have become more erratic. Riparian health is more important than ever in this climate, so water retention can be optimized for vegetation and animal health.

To protect these areas from streambank vegetation loss and streambank erosion, I believe that it is imperative to include more regulations regarding domestic ungulate presence in all riparian areas within grazing allotments in the Manti LaSal National Forest. I agree with the Conservation Alternative standard that, "No more than 20% of the length of any 200 feet of streambanks may be trampled within areas grazed by livestock" (108). I believe that there should be a guideline that requires new exclosures to be built around riparian areas that contain threatened, endangered, and rare species. An additional guideline requiring an increased number of exclosures in riparian areas for monitoring and studying the impact of cattle and sheep on riparian areas should be added as well.

I thank you for considering my comments,

Katie Wallace