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Comments:

Brian Monroe, District Ranger

Fillmore Ranger District, 390 South Main Street

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(435) 896-1011

Re: Flat Canyon Allotment Management, PALS Tracking #: 64356

Dear District Ranger Monroe,

Thank you for the opportunity to comment on the Flat Canyon Environmental Assessment (EA). These comments are submitted on behalf of Western Watersheds Project (WWP), which is a west-wide non-profit 501(c)3 organization dedicated to protecting and conserving the public lands and natural resources of watersheds in the American West. WWP has over 12,000 members and supporters, including members who live in Utah. WWP's mission is to protect and improve the riparian areas, water quality, fisheries, wildlife, and other natural resources and ecological values of western watersheds. To do so, WWP actively participates in agency decision-making on livestock grazing issues on Forest Service and BLM lands in Idaho, Nevada, Utah, Colorado, Arizona, Montana, California, Oregon, and Wyoming.

We ask the Forest to analyze the following issues in the draft EA.

Multiple Use Management

The Federal Lands Policy and Management Act (FLPMA) states that "goals and objectives be established by law as guidelines for public land use planning, and that management be on the basis of multiple use and sustained yield unless otherwise specified by law." The Scoping Letter emphasizes the Forest Service's policy and management direction to support the ranching lifestyle and local communities within a multiple-use context consistent with its 1986 Land and Resource Management Plan (RMP). It cites several authorities for this, including: Forest Service Manual 2203.1; 36 CFR 222.2 (c), Multiple Use Sustained Yield Act of 1960, Forest and Rangeland Renewable Resources Planning Act of 1974, FLPMA of 1976, and National Forest Management Act of 1976.

However, those authorities also stipulate that management objectives must be consistent with mandates to manage for long-term sustainability of natural resources. "Multiple-use" does not mean all uses must occur everywhere, and the Forest has wide latitude under FLPMA to determine the best use of the resources it manages as present and future needs dictate.

ISSUE 1. Fishlake National Forest RMP Management Areas

The RMP defined three Management Areas in this allotment. Each of these have specific emphases and requirements. By far the largest management emphasis area is 4B, Habitat for Management Indicator Species. There is also a smaller unit 2A for Semi-primitive Motorized Recreation, and a 6B unit for Intensive Livestock Management that is smaller still. (See Map 4 on page 15.) The RMP states that management emphasis in 4B units:

"...is on the habitat needs of one or more management indicator species. Species with compatible habitat needs are selected for an area. The prescription can be applied to emphasize groups of species, such as early succession dependent or late succession dependent, in order to increase species richness or diversity. Vegetation characteristics and human activities are managed to provide optimum habitat for the selected species, or to meet population goals jointly agreed to with the Utah Division of Wildlife Resources. Tree stands are managed for specific size, shape, interspersions, crown closure, age, structure, and edge contrast. Grass, forb, and browse vegetation characteristics are regulated. Rangeland vegetation is managed to provide needed vegetation species composition and interspersed grass, forb, and shrub sites or variety in age of browse plants." Fishlake RMP page IV-95.

The Forest Service is bound by the management direction in the RMP to maintain habitat quality for the 4B Management Indicator Species zone that makes up most of the Flat Canyon allotment. In the draft EA, please provide a list of the Fishlake National Forest Management Indicator Species that occur on the Flat Canyon Allotment and analyze how each alternative will impact these species. We are particularly interested in how conversion to summer cattle grazing will affect availability of forage and water for wildlife.

Please discuss trends in wildlife populations on the allotment, including native bees and other native pollinators, amphibians, birds, small mammals.

ISSUE 2. Forest Sensitive Plant Species

According to the "Environmental Assessment for Appropriate Livestock Grazing Practices Fishlake National Forest Sheep Allotments", two rare plants occur on the allotment .

- Ward beardtongue (*Penstemon wardii*) is a restricted Utah endemic with a Vulnerable status. It requires specialized shaley soils and thus is affected by mining for gypsum on Arapien Shale, oil and gas exploration activities, and off road vehicle use, which is abundant on the allotment. Drought and Mormon cricket infestations have caused recent declines.
- Elsinore buckwheat (*Eriogonum ostlundii*) is a restricted Utah endemic with a Vulnerable status. According to NatureServe, it is impacted by mining and grazing. (See also the draft EA at 46).

The Biological Evaluation (BE) of Sensitive Plant Species for the Fishlake OHV Route Designation Project determined that OHV trails "May Impact Individuals or Habitat, but Will Not Likely Contribute to a Trend Towards Federal Listing" for both species. Has monitoring data confirmed this? How would the combined effects of the OHV impacts and grazing affect the species? The Biological Evaluation also noted that "increased utilization of gypsum will tend to reduce the habitat availability and population size of this species. Gypsum mining has and may continue to pose the major threat to endemic plants on the Arapien Shale Formation (Spahr et al. 1991)". Does this information still pertain to the species locations on the allotment?

Please analyze the three alternatives in the context of the protection levels afforded to Management Indicator Species and other rare or sensitive species.

ISSUE 3: Flat Canyon Inventoried Roadless Area (IRA)

The U.S. Forest Service adopted the Roadless Area Conservation Rule (Roadless Rule) in 2001 "to protect and conserve inventoried roadless areas on National Forest System lands." Forest Service, Special Areas, Roadless Area Conservation, Final Rule, 66 Fed. Reg. 3244 (Jan. 12, 2001). The rule observed:

"Inventoried roadless areas provide clean drinking water and function as biological strongholds for populations of threatened and endangered species. They provide large, relatively undisturbed landscapes that are important to biological diversity and the long-term survival of many at risk species. Inventoried roadless areas provide opportunities for dispersed outdoor recreation, opportunities that diminish as open space and natural settings are developed elsewhere. They also serve as bulwarks against the spread of non-native invasive plant species and provide reference areas for study and research."

"The Roadless Rule defines "roadless area characteristics" as including:

- (1) High quality or undisturbed soil, water, and air;
- (2) Sources of public drinking water;
- (3) Diversity of plant and animal communities;
- (4) Habitat for threatened, endangered, proposed, candidate, and sensitive species and for those species dependent on large, undisturbed areas of land;
- (5) Primitive, semi-primitive nonmotorized and semi-primitive motorized classes of dispersed recreation;
- (6) Reference landscapes;
- (7) Natural appearing landscapes with high scenic quality;
- (8) Traditional cultural properties and sacred sites; and
- (9) Other locally identified unique characteristics.

The Roadless Rule has effectively protected higher altitude areas but mid-elevation sites like the project area (between 5,400 and 7,800 feet) are not well represented in the system, so the Flat Canyon IRA, which constitutes a large portion of the allotment, is an important representative of mid-elevation IRAs. Grazing and its attendant activities and infrastructure, which may require intensive motorized use, would lead to more management conflicts with IRA designation than the No Action alternative. That alternative provides more management consistency with the IRA compared with Alternatives 1 and 2.

ISSUE 4: Allotment Lands Capable of Supporting Livestock Grazing

The Scoping Letter says that the 1986 Fishlake National Forest Land and Resource Management Plan "gives direction to provide forage for livestock and wildlife within range capacity to sustain local dependent livestock industry, and wildlife numbers (LRMP 1986)." Emphasis ours. The EA must therefore address the capability of the allotment to support livestock grazing and still maintain land health. The analysis should factor out the areas of steeper slopes, highly erodible soils, and low productivity that are not capable of supporting a grazing operation. The Forest should also take this opportunity to update stocking rates based on data from clip-and-weigh forage samples. The capable lands and stocking rates on the allotment should also reflect guidance on capability from the Region 4 Forest Service. Lands capable of supporting livestock include areas that:

- 1) are less than 45 percent slope for domestic sheep, 30% for cattle.
- 2) produce an average of 200 lbs. or more of forage/acre.
- 3) are without dense timber, rock, or other physical barriers.
- 4) have naturally resilient soils (not unstable or highly erodible soils).
- 5) have ground cover greater than 60%.
- 6) are within one mile of water or where the ability to provide water exists.

According to the EA, the Flat Canyon pasture is difficult even for sheep operations due to lack of water, which is why the former operator sold the permit. This, in addition to the fact that almost half of the acres in the allotment are over 30 percent slope with unproductive soils, makes it even more difficult to run cattle sustainably.

Therefore, please analyze trends in vegetation production during at least the past 25 years, including a clip and weigh capacity analysis and a Normalized Difference Vegetation Index (NDVI) analysis.

ISSUE 5: Desert Bighorn Sheep

According to public comments, this allotment was purchased by the Utah Wild Sheep Foundation and the Sportsman for Fish and Wildlife for the purpose of reintroducing Desert Bighorn Sheep. There are few areas in Utah with suitable bighorn sheep habitat that could serve as a reintroduction site, and the Flat Canyon allotment is one of them. However, this project would not be possible under Alternative 1 (Winter Sheep Grazing) due to the possibility of fatal disease transmission from domestic to bighorn sheep.

The State of Utah Department of Wildlife Resources has an active bighorn sheep reestablishment program and the Utah Wild Sheep Foundation would solicit their participation in this project. The State's bighorn sheep management plan emphasizes that their proposals do not involve "involuntary grazing restriction, conversion or termination...". Fortunately, there was a willing seller in this case. Selecting the No Action alternative would present a rare opportunity to facilitate bighorn sheep restoration in an allotment that appears to have a low capacity for sheep grazing and an even lower one for cattle grazing.

ISSUE 6: Land Health Assessments

The Scoping Letter details the history of management on the allotment, which appears to show a gradual shift from cattle and horses towards sheep, perhaps to better accommodate the capability limitations of the allotment. The letter says that conditions are satisfactory with an upward trend, which, while positive, might imply that there is still room for improvement.

Please include the assessment of allotment resource condition in the EA. The Scoping letter provides no information on this topic and it is relevant because, if poor land health requires management attention, a no grazing alternative would be the most appropriate selection. It would allow the most rapid restoration of land health and is most consistent with the low capability for livestock grazing of at least a large part of the allotment.

ISSUE 7: Economics

The Scoping letter cites Forest Service policy supporting the economic and social well-being of people by providing opportunities for economic diversity and by promoting stability for communities that depend on range resources for their livelihood (FSM 2202.1; USFS 2005). However, this begs the question of whether the Flat Canyon allotment is able to support enough livestock to be a significant contribution to a rancher's livelihood or the county economy. Please compare the economic contributions of agriculture versus hunting to the Sevier County economy. How much does sheep grazing on the allotment provide to the economy of Sevier County? How much would hunting permits and guiding businesses bring into the local economy?

Please also analyze the value of the allotment for ecosystem services, including the social cost of carbon. Recent guidance was issued for assessing these intangible factors. "The Guidance For Assessing Changes In Environmental And Ecosystem Services In Benefit-Cost Analysis" focuses on rule-making but can also be applied to actions on the level of an EA. Ecosystem services include "plants, animals, fungi, and microbes, and the extent and quality of their habitats". The document states that "changes in atmospheric greenhouse gas concentrations can result from changes in the natural climate regulating system, including habitat extent, land use, habitat quality, species populations, biogeochemical processes, and soil conditions. This includes changes in carbon storage and sequestration. The EA should include an analysis comparing the level of ecosystem services provided by each alternative with a baseline ungrazed reference condition.

The economic analysis should also include an estimate of the carbon inputs and outputs of each alternative (i.e., the social cost of carbon). For example, livestock are significant sources of greenhouse gases through enteric

fermentation and manure deposition. On public lands one cow-calf pair grazing for one month (an "animal unit month" or "AUM") produces 875 kg CO₂e through enteric fermentation and manure deposition with a social carbon cost of nearly \$36 per AUM. This number doesn't include the ecosystems costs from grazing impacts and associated livestock management activities that reduce biodiversity, carbon stocks, and rates of carbon sequestration. How do the carbon costs vary by alternative?

ISSUE 8: Adaptation and Mitigation of Climate Change

The Intermountain Adaptation Partnership, of which the Forest Service Intermountain Region is a member, has issued a document with guidance on managing resources in the face of climate change. Inventories have been conducted in several managed areas, including the Dixie National Forest. They have identified the resources most likely to be impacted by climate change: water availability, soil integrity, and vegetation composition.

Water availability: Halofsky et al. (2018) recognized impacts on water resources as one of the most urgent issues requiring management solutions. The Forest Service can expect even less water availability on the Flat Canyon allotment in the future. This may also impact forage resources.

Soil Integrity

Healthy soils can sequester soil organic carbon. Disruption of naturally unstable soils, which occur on much of the allotment, can increase water runoff and soil loss. If the instability is exacerbated by grazing management they may be prioritized for attention. These areas would be expected to have a higher risk of soil quality loss under a warmer and drier climate with reduction in plant growth and SOC development.

Vegetation: The allotment appears to be dominated by pinyon and juniper woodland community types with a lesser amount of sagebrush vegetation communities. Although these types naturally have a low fire frequency, increases in exotic invasive annuals as a result of soil disturbance have changed fire regimes. Increased dominance of nonnative species (e.g., cheatgrass) will reduce range quality and support more frequent wildfires. Models suggest that climate change may have a significant negative effect on sagebrush shrublands (Halofsky et al. p 74). Livestock grazing is one of the factors contributing to the vulnerability of these communities.

For each alternative in the EA please analyze water, soil, and vegetation resources in the context of management adaptability to climate change, including:

- Assessment of trends of water availability on the allotment, using Forest Service hydrological data or the best available regional assessments of water trends.
- Current soil health on the allotment, and the levels of protection each alternative affords for recovery or maintenance of soil health and Soil Organic Carbon sequestration.
- Drought trends over time and Fishlake National Forest plans for drought management. How does each alternative vary with regard to drought recovery?
- Assessment of vegetation functional groups, levels of bare ground, and cover of invasive exotic species, particularly flammable annual grasses.

CONCLUSION

The history of Flat Canyon allotment management alludes to the difficulty of maintaining a sustainable sheep operation, much less cattle. This might be explained at least in part by the low capability of this allotment. These realities argue against adopting Alternatives 1 or 2. Fortunately, the Forest Service now has a rare opportunity to restore desert bighorn sheep. It has the authority under FLPMA and the RMP to prioritize conservation of wildlife and watershed protection on this allotment. Both of those values fall under FLPMA's concept of multiple use. By selecting Alternative 3, the No Action alternative, the Forest can also fulfill its management responsibility to prioritize the protection of habitat for Management Indicator Species and protect values on the Flat Canyon

Inventoried Roadless Area. We urge you to adopt this common sense management alternative.

Thank you for your time.

Sincerely,

Laura Welp