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Comments: LeValley Ranch is a multi-generational ranch located in Delta County and a business owner of Homestead Meats. Historically, LeValley Ranch held a USFS grazing permit and in 2021 we held a temporary permit. This interaction with the USFS was positive for all parties and provides the basis for these comments.

Overall the rangeland portion and analysis of the GMUG plan are consistent with existing range science and resource conditions. To be consistent with existing USFS documents, the large intact landscapes that are the ranches who rely on grazing permits should be acknowledged for their buffering of the forest lands, their contribution to wildlife habitat, and view shed for the GMUG in addition to the economic contribution.

Recreation is given a higher priority than other multiple use activities and in specific references indicates that livestock grazing may be displaced by recreational activities due to impacts of recreation. Forest plans should address priorities, however specific permit actions in advance of impacts is moving straight to a single solution for a complicated problem. Continuing with this same theme, solutions to declining conditions or resources on the forest go straight to reducing livestock numbers or time on the allotment. The forest plan must direct personnel to first determine through quantitative data that livestock are the causal effect of the decline.

Livestock grazing is briefly mentioned as a tool for vegetation management, however additional emphasis needs to be placed on the role that grazing can play in reducing fuel loads, reducing invasive plants and vegetation management. Wildlife are mentioned as inadvertently spreaders of weed seeds, however livestock are listed as a causal factor. Both vectors need to be listed in a similar fashion as the mode of spread from both sources are similar.

Livestock are listed in the forest plan as causing trampling of water sources. While this is

accurate, it would be more correct to indicate that both livestock and wildlife and recreationists may cause impacts to streambanks and water sources. Additionally, livestock grazing is listed in the same level of impacting scenic resources as fire management. This specific reference is not even realistic nor reflective of actual conditions on the ground. Livestock waste is mentioned as dominating grasslands and meadows and this again is not realistic nor actualized on the vast acreage of the GMUG. Range management is listed as a negative in numerous paragraphs specifically, when scenery is mentioned.

In the recreation section, it would be important for the USFS to list that in addition to seeing wildlife, recreationists may see livestock on the landscape when utilizing wilderness areas. This statement is in general areas but is not mentioned in the wilderness section.

Unnecessary fences are mentioned for removal, however there is no guidance to help USFS personnel first determine how fences should be categorized.

Specific to carbon sink information, rangelands are not mentioned as a source. Research clearly shows that rangelands are a significant source of carbon sequestration and that needs to be mentioned in the GMUG plan especially given the length of the implementation of the forest plan. Forest lands and other areas are mentioned; however, rangelands need to be included in this list as well as an estimation of the carbon sequestration they provide. Rangelands are a large repository of soil C because of their high C density and the vast land resource area they represent. Improved range management strategies have been shown to significantly increase soil C storage while concurrently providing other benefits such as improved water infiltration, increased water storage capacity, and greater nutrient reserves. Because productivity of rangelands is inherently low with traditional low-input management systems, suggested strategies for improving production, and concurrently soil C sequestration, include: 1) using appropriate plant species, 2) enhancing water-use efficiency, 3) controlling erosion and restoring degraded soil, and 4) managing and enhancing soil fertility

Specific to wildlife corridors, multiple uses are listed as being potentially negatively impacted. Wildlife corridors are huge landscapes and to use broad brush language in the forest plan is not adhering to adaptive management nor the interconnectedness of the various uses that have existed on the ground for a number of years.

Reducing permit numbers and/or time should not be the direction provided as an initial tool when working to reduce the direct contact between bighorn sheep and domestic sheep. Additionally, the specific language refers to pack goats and domestic sheep are solely responsible for the long-term viability of bighorn sheep which is not accounting for all of the other influences that also are currently impacting the health of the bighorn sheep.

- * Page 24 Fire and Fuels Management: Livestock grazing should be considered a priority land management tool to reduce fuel loads, which consequently reduces the duration and intensity of wildland fires.
- * Page 25: Include livestock grazing in the list of management tools to reduce fuels loads
- * Page 57: Clarify that grazing is vegetation management.

* Page 57 FW-DC-RNG-01: add [ldquo]Well managed wildlife populations and their forage use will be considered, and populations levels managed to achieve desired ecological conditions, allowing for adequate forage for livestock use.[rdquo] Livestock permittees should not be negatively impacted because of over-utilization by wildlife.

* Page 57 FW-DC-RNG-03: Before implementing changes to allotment management, it should first be determined if livestock is the causal factor of changing conditions or resources.

* Page 59 FW-DC-RNG-13: [ldquo]livestock/wildlife trampling[rdquo] Wildlife also utilize water sources and have the same ability to trample.

* [ldquo]Climate change[rdquo] [ldquo]extreme weather events[rdquo] and references to [ldquo]future climate conditions[rdquo] should not be used as a decision-making factors in this document.

* [ldquo]Citizen science[rdquo] should not be used as a basis for decision making. There is a distinct difference from educated stakeholder involvement (e.g. permittee monitoring) vs. [ldquo]citizen science[rdquo]

* Recreation should not be a higher priority than other multiple use activities. Other multiple uses such as grazing are equally important and should not be negatively impacted by decisions for increased recreational opportunities.

* Livestock grazing should not be displaced by recreational activities or be negatively impacted or forced to change grazing practices due to impacts caused by recreationalists.

* Livestock should not be referenced in the context of invasive species.

* More emphasis should be placed on grazing to reduce fuel loads which consequently reduce the duration and intensity of wildland fires.

* The GMUG Forest plan continues to perpetuate the myth regarding [ldquo]disease transmission[rdquo] between domestic and bighorn sheep, and ignores the most recent information regarding M ovi. Disease is NOT transmitted! There is a possibility of pathogen transmission through DIRECT (nose-to-nose not indirect) contact. Even if pathogens are transmitted, that is not a foregone conclusion that the pathogens will cause respiratory disease to develop in bighorn sheep. Furthermore, The Mycoplasmas: Molecular biology, Pathogenicity, and Strategies for Control textbook states: [ldquo]assumptions about restricted host range of mycoplasmas, based on the host from which they were first or frequently isolated, are usually made in the context of nearly complete absence of representative sampling of the vast majority of potential hosts.[rdquo] Additionally, M ovi has now been detected in mule deer, whitetail deer, moose, bison, and caribou further demonstrating the lack of understanding of the host range and transmissibility of this bacteria. The USFS needs to stop relying upon forced enclosure (pen) studies to make decisions regarding open range grazing. Forced pen studies are not indicative of open range grazing, and greatly skew perspectives on this issue. Possible pathogen transmission may occur with direct contact, not just because the two species are in the same area.

* The degree of risk of potential pathogen transmission from domestic sheep to bighorns in open range conditions is unknown and it is not clearly understood even in experimental confinement settings. Forced enclosure experiments ([ldquo]pen studies[rdquo]) are not indicative of, and do not provide a direct correlation to, what happens in open range situations. Therefore, we strenuously object to the USFS continued reliance upon forced enclosure experiments to guide grazing policies on our national forests.

* Reducing permit numbers and/or timing should not be the direction provided as the tool when working to reduce the risk of potential direct contact between bighorn sheep and domestic sheep. If permittees are forced to reduce AUMs, an equitable alternative grazing allotment should be provided.

* The specific language that refers to domestic sheep and goats being solely responsible for the long term viability of bighorn sheep is not accounting for all of the other factors that impact bighorn herd health.

* The Grazing Response Index is a time proven effective monitoring tool. A negative number does not equate to

a reduction in permit number or time. A negative number is the basis to first do something to address the following year and not let it become a trend. If there is a consistent negative number then permit action should be evaluated.

* Page 242: Livestock do not emit a significant amount of carbon dioxide and should not be singled out versus other breathing animals and uses on the GMUG. The methane from ruminant animals is short term impact and the significant carbon sink of managed rangelands makes the domestic animal grazing a non-issue specific to emissions.

* Page 248: Quantify the contributions of rangelands as a carbon sink on the GMUG.

* Page 289: Livestock grazing is not a primary influencer of forest or watershed condition.

* Page 90 Sufficiency: Livestock use should be removed as a risk factor to the ecosystem, or clarification language should be added, such as [ldquo]in limited circumstances, livestock can impact localized areas of an ecosystem.[rdquo] To portray that livestock grazing impacts the montane-subalpine grasslands as a whole is incorrect.

* Page 91: [ldquo]Roads and livestock have contributed to erosion, soil compaction, soil loss, and a loss in proper hydrologic function in the sagebrush ecosystem.[rdquo] A reasonable estimate of the percentage of loss attributed to livestock needs to be presented, instead of a sweeping generalization.

LeValley Ranch is supportive of Alternative C as this allows the flexibility needed to address current and future changes based on environment, disease and fire management.

Sincerely,

Mark LeValley

LeValley Ranch, General Partner