

Comments

Castle Valley Project Final Environmental Assessment and FONSI

Grand Canyon Trust • Project Eleven Hundred

“The Castle Valley parcel contains **valuable watershed resources** including wet meadows, perennial streams with relatively healthy riparian zones, and associated wetlands. The Castle Valley land acquisition proposal presents the Cedar City Ranger District and Dixie National Forest with **a rare opportunity to protect** these resource values.”

--USFS, Final Land Purchase Analysis

Grand Canyon Trust and Project Eleven Hundred offer the following assessment of the Castle Valley Project’s Final Environmental Assessment. Given the current Forest Service regulations, we lack the capacity to legally challenge the EA; however, in this letter we express our discouragement with the decision:

- **The final decision contributes to the extreme lack of balance between livestock-grazed lands and livestock-free lands on the Dixie National Forest.**

Approximately 95.5% percent of the Dixie NF (DNF) is within active livestock allotments.¹ While the 663 livestock-free acres within the Castle Valley parcel do not constitute a large area compared to the surrounding sheep allotment, livestock-free wetland complexes are generally absent on the DNF and are rare throughout the southern Utah region. Despite this, Cedar City RD has chosen to use the land acquisition for livestock grazing and browsing. The FEA at 57 states:

The Land Purchase Analysis (LPA) and other documents in the record for the Castle Valley Land Acquisition indicate the **primary reasons the Forest Service wanted to purchase the property were to protect valuable wildlife, riparian, and wetland habitats** . . . the acquisition documents make clear that consistent management with surrounding National Forest System (NFS) lands was one of the intents. [Emphasis added]

While grazing is one of the land uses within the DNF, the retention of a natural wetlands-uplands complex without livestock grazing is consistent with management of the surrounding NFS multiple use lands. Livestock-free land, rare as it is on the Dixie NF, is a valid

¹ Grand Canyon Trust calculations several years ago, based on Dixie NF allotment GIS.

multiple use, e.g., for native plants, pollinators, and other wildlife; climate adaptation; and a chance for the public and DNF staff to observe a wetlands-uplands complex that is not subjected to ranching. These multiple uses would have been in closer alignment with the primary reasons for the land purchase. Instead, these multiple uses are, once again, lost to the DNF's obsessive expectation of livestock grazing as the expected use - albeit the most ubiquitous, impactful use - on almost every acre of the forest.

Wetlands are among the most biodiverse and productive ecosystems and among the most endangered habitats. The DNF had an *amazing* opportunity to simply allow the 663 wetland-containing acres to remain free of commercial livestock and gain knowledge we and the DNF lack about wetlands and their associated uplands amid climate change, with and without livestock consumption and trampling. The decision to graze the Castle Valley land parcel was a decision to forgo many opportunities; which is discouraging and disappointing.

- **The decision to graze the Castle Valley land acquisition passes up the simple opportunity to leave a small area as a reference area in comparison with forest management of sheep on the adjacent allotment amidst climate change.**

Livestock-free conditions are necessary for understanding the respective roles of drought and climate versus livestock grazing in upland conditions. There is no clearer way to understand the contributions of livestock grazing to poor or downward-trending conditions. The FEA at 28-29 states the following regarding the adjacent sheep-grazed allotment:

Through 2022, **ten of the sites (83%) were not meeting objectives at their last reading...**six sites that did not meet their objectives all failed because they had a downward trend since the prior reading and/or **they did not meet their ground cover objective.** [Emphasis added]

Rather than addressing the direct factors that are likely contributing to downward-trends within the WBCV allotment (i.e., stocking and utilization rates), the Dixie NF instead hopes that by expanding the acreage for the one sheep permittee, that current downward-trending upland conditions on the larger allotment will improve. With the land acquisition slated for sheep-grazing, there will be no way of determining whether the downward trends are a result of grazing, climate-related factors, or their cumulative impacts. Instead of allowing for such information, the Forest is clinging to the idea that the damage on WBCV allotment's uplands will be diluted by continuing the same management on the acquired parcel's uplands - while the land becomes more aridified through climate change.

- **The cumulative impacts of drought and sheep-grazing are not given adequate weight in the final EA.**

Throughout the FEA, the impacts of drought are consistently blamed for conditions within the WBCV allotment that are failing to meet objectives. For instance:

While upland vegetation trend data on the land acquisition acres and surrounding WBCV Allotment indicates many sites are not meeting Forest Plan objectives, recent data suggest that **the existing condition may not be heavily influenced by current livestock management**. Instead, it appears that long-term drought and other disturbances (wildfire) are having much larger influence on the existing condition of upland vegetation. **Because of this the Proposed Action is not expected to have appreciable short-term or long-term negative impacts to pollinators.** [Emphasis added] (FEA at 51).

Additionally, the FEA mentions (on several occasions) that the adjacent allotment is managed differently during drought conditions. In response to one of the concerns we raised during the draft EA comment period regarding the specifics of these management adjustments, we received the following response:

No correspondence or documentation about drought instructions in 2002-2004 was found; however, it is possible that instructions were given verbally at annual AOI meetings. The drought management process outlined in the Range Specialist Report was followed beginning in 2021, with **options to reduce numbers of livestock and duration of season...** **Monitoring never demonstrated the need to change** the duration of the season or numbers of livestock in those years. [Emphasis added] (Final Concern Response to concern #20).

According to the USDA-sponsored US Drought Monitor, the area of the land acquisition experienced severe drought conditions during 2002, 2003, 2004, 2021, and 2022. Despite the FEA claiming that changes in management occur during such conditions, there is no evidence to support this claim. Had verbal instructions been provided, there was no documentation to demonstrate permittee compliance. The FEA mentions:

The southwest has also been in an extended drought period since the turn of the millennia (Williams et al. 2022). **Locally, portions of Iron County have been in Moderate drought conditions or worse over 58% of the time since 2000** (Figure 3, Appendix 1). Additionally, **data shows some portion of the county has been in Severe drought conditions or worse 38% of the time since 2000.** [Emphasis added] (EA at 27)

Despite the above statement, apparently no changes to allotment management were made during these years. Almost certainly the drought is a significant contributor to the downward trending upland conditions (and those failing to meet objectives). However, with no change in grazing management, it is irresponsible and unjustified to ignore the potential that sheep grazing has magnified and exacerbated drought impacts. For instance, the same number and season of sheep have been grazing on plants and flowers whose production is curtailed during drought.

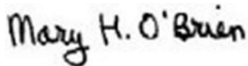
In summary, the DNF claims that it adequately considered the potential environmental consequences of drought and sheep grazing by mentioning potential consequences, having drought guidelines on the books, and asserting without any evidence that changes in management have occurred during drought conditions. The reality is that the forest can provide no evidence about anything having changed regarding the conventional sheep grazing and intensity on the ground. There is no basis for the Dixie NF to assume that drought is the major cause of downward upland trends recorded on the adjacent allotment.

Thank you for reading and thinking about our assessment of the Castle Valley Final Environmental Assessment, and of your forest management. Our concerns are rooted in the fact that this region is part of a global climate and biodiversity crisis, and that livestock grazing exacerbates both. We've found little to assure us that Dixie NF is taking these crises seriously, and this decision only adds to our concern.

Sincerely,



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