

Manti-La Sal NF Forest Plan Revision Assessment Information

Annual, Heavy Livestock Grazing During Similar Times in the Growing Season

**Grand Canyon Trust
9/12/2016**

Significant Issue

Moderate (40% utilization) or heavy (>40%-60% utilization) livestock grazing annually and/or at the same time of year threatens the presence and/or population numbers of palatable native plant species as well as their pollinators.

1. **Grazing of palatable native species during growth initiation, flowering, and/or seeding** can limit their reproduction, leading to their decrease or disappearance from the site.
2. **Pollinators** depend on the presence of flowers or of larval plants, and many pollinators are annual, such that if the flowers are gone from a site one year, they may not return at all or for multiple succeeding years.
3. **Biodiversity loss.** The decrease or disappearance of native species, particularly native forbs and pollinators, is neither monitored regularly or easily, and yet this decrease or disappearance constitutes decline or loss of native biodiversity, contrary to the National Forest Management Act .

Information Provided for the Assessment Phase

1. Grand Canyon Trust. 2016. Grazing and rest on Manti-La Sal NF. 2007-2016.
2. Grand Canyon Trust. 2016. Overlap grazing scores: Ferron/Price Ranger District. 2007-2016.
3. Collaborative Group on Sustainable Grazing for U.S. Forest Service Lands in Southern Utah. 2012. [*Final Report and Consensus Recommendations*](#). See pp. 12-13 on consensus recommendations re: time, timing, and intensity
4. United States Forest Service. 2015. [*Pollinator-Friendly Best Management Practices for Federal Lands*](#). Draft. See p. 18 regarding grazing.

Assessment in the Draft EIS

The Draft EIS needs to inform the public that the most common condition of grazed lands within the Manti-La Sal NF is one of annual, heavy livestock grazing (generally utilization limit

60%) with no rest during the growing seasons of the past 10 years (2007-2016). The exception is Ferron-Price RD, which has included rest once or twice within the past ten years on most (69%), but not all, pastures.

Moreover, the timing of livestock grazing on most Manti-La Sal NF pastures, and particularly higher-elevation pastures, falls within the growing, flowering, and/or seeding period in most years. Across all pastures in the Ferron-Price Ranger District, the average difference between the time in the season when a pasture was grazed one year and the next is 10 days. Gentry Allotment grazes the pastures on top of Gentry Mountain (the bulk of each year's grazing) at the same time every year, with an overlap score of 21 days.

The Trust will provide similar overlap charts for Sanpete and the Moab-Monticello Ranger District as soon as we complete them. We also will provide (at the September 13 Open House) a DVD with an excel sheets of Annual Operating Instruction on-off dates for each pasture on each District for 2007-2016 so that the Forest can use this to assess differences among districts and allotments.

As the *Final Report and Consensus Recommendations* (link provided above) notes on p. 13.:

Optimum benefits are achieved by management of all three principles – time, timing, and intensity – together. For example, implementing the principles of “time” and “timing” simultaneously could mean a greater percent of the management unit (allotment) would receive growing season rest each year, and ideally, at least one pasture totally rested.

The U.S. Forest Service publication, *Pollinator-Friendly Best Management Practices for Federal Lands* (p. 28; link provided above) explains the significant threats livestock grazing practices can pose for pollinators:

Livestock grazing alters the structure, diversity, and growth pattern of vegetation, which affects the associated insect community. Grazing during a time when flowers are already scarce may result in insufficient forage for pollinators. Grazing when butterfly larvae are active on host plants can result in larval mortality and high intensity grazing can cause local loss of forb abundance and diversity.

Among the best grazing management practices recommended by the U.S. Forest Service in this publication (p. 28) are the following that are relevant to time, timing, and intensity of grazing on the Manti-La Sal NF:

- Minimize livestock concentrations in one area by rotating livestock grazing timing and location to help maintain open, herbaceous plant communities that are capable of supporting a wide diversity of butterflies and other pollinators.
- Protect the current season's growth in grazed areas by striving to retain at least 50% of the annual vegetative growth on all plants.

- Enhance the growth of forbs to ensure their ability to reproduce and to provide nectar and pollen throughout the growing season by setting grazing levels to allow forbs to flower and set seed.
- Prevent grazing during periods when flowers are already scarce (e.g., midsummer) to maintain forage for pollinators, especially for bumble bee species.
- In important butterfly areas, avoid grazing when butterfly eggs, larvae, and in some cases pupae are on host plants
- Include protection of pollinator species in grazing management plans.

The current, most common condition on the Manti-La Sal NF is heavy livestock utilization, every year, at similar times in the growing season. This inevitably favors unpalatable native and exotic plant species, selecting against palatable native species, and failing to provide for native pollinators.