



Angelita S. Bullets
Dixie Forest Supervisor
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115 East 900 North
Richfield, UT 84701

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Manti-LaSal Acting Forest Supervisor
599 West Price River Drive
Price, UT 84501

Re: Comments of Utah Association of Counties Regarding:
Dixie NF, Fishlake NF and Manti-LaSal NF Joint Review of Livestock
Grazing Effects on Select Ecosystems of the Dixie, Fishlake and Manti-La
Sal National Forests;
Reference 79 FR 159 at 48721 (August 18, 2014)

Dear Supervisors,

Thank you for the opportunity to comment on the Dixie, Fishlake and Manti-LaSal grazing review referenced in the August 18, 2014 79 FR 159 notice (hereafter "the 3 Forest Action" or "Action").

The 3 Forest Action is legally defective from its beginning, because it

- Failed to proceed under NEPA and
- Failed to bestow cooperating agency status on the counties but instead *de-facto* bestowed cooperating agency status on an NGO, turning the NEPA process on its head.

The 3 Forests should terminate this Action entirely, dismiss the NGO from its undeserved *de facto* cooperating agency status, and this time give notice of intent to proceed under NEPA, negotiate and execute proper cooperating agency MOUs with the State, tribes and each county in which part or all of each Forest lies, go through public scoping, and give the cooperators, not an NGO to the exclusion of the cooperators, exclusive and confidential attention and involvement to build the Administrative draft NEPA document. Then release a public draft for the comment of the NGO and other members of the public. *Your having done the opposite thus far renders this 3 Forest Action invalid beyond repair; it needs to be scrapped.*

OFF THE COUNTIES' RADAR, AN NGO EXCLUSIVELY AND SUBSTANTIALLY COLLABORATED WITH THE FORESTS TO PRODUCE THE SO-CALLED "INITIAL REVIEW" BEFORE THE ACTION EVEN RECEIVED FEDERAL REGISTER NOTICE. ALL ASSOCIATED ACTIONS SHOULD HAVE BUT WERE NOT CONDUCTED UNDER NEPA.

Exhibit A is a screen shot of an NGO website referencing the 3 Forests Action. The NGO website expressly and impliedly belies already existing extensive knowledge and involvement by the NGO in the 3 Forest Action, and that the NGO is even a substantial player and partner in the Action.

The NGO website is linked to a letter authored by the NGO, copy attached as Exhibit B. The NGO letter informs readers of "Your Aug 11-Sept 29, 2014 Opportunity to Tell the Forest Service What You Know and Think About Livestock Damage on the Dixie, Fishlake, and Manti-La Sal National Forests," implying strongly that the NGO website and it all it contains is dated on or before August 11th.

The August 11th or earlier NGO website electronically linked to a Forest Service letter dated August 8, 2014, copy attached as Exhibit C.

The August 8th Forest Service letter refers extensively an already completed Forest Service document known as "*Initial Review of Livestock Grazing Effects on Select Ecosystems of the Dixie, Fishlake and Manti-La Sal National Forests*"

(hereafter “FS Initial Review”), copy attached as Exhibit D. The FS Initial Review cover page bears a date “August, 2014,” but based on the foregoing the Initial Review was completed on or before August 8, 2014.

The conclusion from the foregoing: The 3 Forests and the NGO who produced Exhibits A and B exclusively collaborated with each other enough to allow the NGO to explain by August 11th or earlier, the substance of the FS August 8th letter and FS August 8th or earlier FS Initial Review *well before the August 18th Federal Register notice even issued*. The fire behind this evident smoke is the only entity accorded *de facto* cooperating status is an NGO while state and local governments go wanting. No doubt additional FOIA probes and court discovery will bore into the iceberg beneath the above-described tip.

Section 102(2) of NEPA and its implementing regulations contain “action-forcing” provisions to make sure that federal agencies act according to the letter and spirit of the Act. 40 CFR 1500.1(a). Forest Service must and shall “[i]ntegrate the requirements of NEPA *with other planning and environmental review procedures* required by law or by agency practice *so that all such procedures run concurrently rather than consecutively*,” 40 CFR 1500.2(c) (emphasis added); “[i]ntegrat[e] the NEPA process into *early planning*,” 40 CFR 1500.5(a) (emphasis added); “[use]the [public] scoping process for an *early identification* of what are and what are not the real issues,” 40 CFR 1500.5(d) (emphasis added); “[i]ntegrat[e] NEPA requirements with *other* environmental review and consultation requirements,” 40 CFR 1500.5(g) (emphasis added).

3 Forests and Region IV USFS surely know it is NEPA’s purpose: to (a) “[i]ntegrat[e] the NEPA process into *early planning* to insure appropriate consideration of NEPA’s policies and to eliminate delay.” 40 CFR 1501.1(a). This is more than just a lofty purpose. Forest Service *shall* “integrate the NEPA process with other planning *at the earliest possible time*,” 40 CFR 1501.2, and shall “consult[] early with appropriate State and local agencies and Indian tribes and with interested private persons and organizations when its [*sic*] own involvement is reasonably foreseeable.”

It is unfortunate counties must remind 3 Forests and Region IV of Forest Service’s most fundamental and incontrovertible NEPA duty: to “commence its

NEPA process at the *earliest possible time.*” 40 CFR 1501.2(d)(3) (emphasis added). 3 Forests’ promulgating the August 8th or earlier FS Initial Review and all the work that went into that violate this most fundamental duty.

Additionally, 3 Forests’ failure to accord the counties cooperating agency status and conduct public scoping before collaborating with the NGO to produce the August 8th or earlier FS Initial Review, violate 40 CFR 1501.6 (“The purpose of this section is to emphasize agency cooperation early in the NEPA process”); 1501.6(a)(2) (The lead agency must to use any environmental analysis and proposals of a county cooperating agency to the maximum extent possible consistent with the lead agency’s responsibility); 1501.6(b)(1), (2) (“Each cooperating agency shall: (1) Participate in the NEPA process at the earliest possible time. (2) Participate in the scoping process.”); 40 CFR 1501.7(a)(1) (“There shall be an early and open process for determining the scope of issues to be addressed and for identifying the significant issues related to a proposed action” and “the lead agency shall ... [I]nvite the participation of affected Federal, *State, and local agencies*, any affected Indian tribe, the proponent of the action, and other interested persons (including those who might not be in accord with the action on environmental grounds”) (emphasis added); 40 CFR 1506.2(d) (The lead agency must ensure that the NEPA statement will discuss any inconsistencies between the proposed action and any approved State or local plan and laws (whether or not federally sanctioned), and where inconsistencies exist, the NEPA statement must describe the extent to which the lead agency will reconcile its proposed action with the State or local plan or law); and 40 CFR 1501.7(b)(4) (Lead agency shall “[h]old an early scoping meeting or meetings which may be *integrated with any other early planning meeting the agency has*”); and 40 CFR 1501.7(a)(4) (The lead agency will, to the extent possible, assign responsibilities for specific issues to a county cooperating agency, and these allocations of responsibilities will be completed during scoping”); Council on Environmental Quality’s Answers to The 40 Most Asked Questions, number 14b (The lead agency, though it has the ultimate responsibility for the content of the NEPA statement, must use any environmental analyses and recommendations of a county cooperating agency to the maximum extent possible, consistent with the lead agency’s responsibility, and consistent with this authority, the lead agency must recognize that if it leaves out a significant issue or ignores the advice and expertise of a county cooperating

agency, the NEPA statement may be found later to be inadequate); and CEQ Answers to 40 Most Asked Questions, No. 23a (The lead agency must:

- first inquire of a county cooperating agency whether there are any potential conflicts between the proposed action and the state and local laws and plans, or if conflicts could arise in the future, and the lead agency;
- ensure that the NEPA document will acknowledge, describe and explain the extent of those conflicts;
- ensure that the NEPA document will evaluate the seriousness of the impact of the proposed action on the state and local land use plans and policies, and whether, or how much, the proposal will impair the effectiveness of land use control mechanisms for the area).

3 Forests and Region IV cannot rationally excuse the foregoing failures on the mistaken notion that the August 8th or earlier FS Initial Review is somehow not subject to the NEPA requirements. For purposes of 36 CFR 220.4(a)(1), the FS Initial Review bespeaks a goal by Forest Service and its NGO enabler and collaborator to greatly alter grazing in 3 Forests and active preparation to make a decision on one or more alternative means of accomplishing that goal. For purposes of 36 CFR 220.4(a)(2), the action bound up in the FS Initial Review is subject to Forest Service control and responsibility. And for purposes of 36 CFR 220.4(a)(3) ad 220.4(a)(4), the envisioned goal of significantly altering 3 Forest grazing would cause major effects on the 3 Forests environment and the relationship of people with that environment, and there is no statutory exemption from the requirements of section 102(2)(C) of NEPA.

Under the NEPA statute Forest Service must do an EIS for “major federal actions significantly the quality of the human environment” which not otherwise categorically excluded. 42 USC 4331(C). The 3 Forest Action easily is such an action under 40 CFR 1508.18. To say the Action’s potential effects on region wide grazing may be majoris a gross understatement. *See* 40 CFR 1508.18 (“Major reinforces but does not have a meaning independent of significantly”). “Significantly” as used in the NEPA statute “requires considerations of both context and intensity.” 40 CFR 1508.27 As for context, the 3 Forest Action completely covers 3 national forests, virtually the southern two-thirds of the State of Utah; hardly a site specific action. *See* 40 CFR 1508.27(a).

As for intensity, the NGO's Exhibit A website says it all, ballyhooing the potential severity of change this Action may bring (with a confidence befitting only an in-the-know *de-facto* cooperating agency) with the banner phrase: "*The Grazing World is Changing – Three New Forest Plans.*" See Exhibit A. Further under 40 CFR 1508.18(b), the 3 Forest Action obviously falls into 3 of the 4 categories recognized in that subsection:

Federal actions tend to fall within one of the following categories:

(1) Adoption of *official policy*, such as rules, regulations, and interpretations adopted pursuant to the Administrative Procedure Act, 5 U.S.C. 551 *et seq.*; treaties and international conventions or agreements; formal documents establishing an agency's policies which will result in or substantially alter agency programs.

(2) Adoption of *formal plans*, such as official documents prepared or approved by federal agencies, which guide or prescribe alternative uses of Federal resources, upon which future agency actions will be based.

(3) Adoption of *programs, such as a group of concerted actions to implement a specific policy or plan; systematic and connected agency decisions allocating agency resources to implement a specific statutory program or executive directive.*

(4) Approval of specific projects, such as construction or management activities located in a defined geographic area. Projects include actions approved by permit or other regulatory decision as well as federal and federally assisted activities.

(Emphasis added.)

For these reasons, Forest Service should scrap the FS Initial Review, start over and next time, integrate NEPA into the process. After all, it is the stated policy of Forest Service to “fully integrate NEPA requirements into agency planning and decision-making,” Forest Service Manual (“FSM”) 1950.2(1), and “apply [NEPA procedures] to the fullest extent practicable to analyses and documentation of Forest Service actions, FSM 1950.3(1).

Thank you.

/s/

Mark Ward
Senior Policy Analyst and General Counsel
Utah Association of Counties
801-265-1331 (office)
801-783-7643 (mobile)

cc.

Governor's Public Lands Policy Coordinating Office
Counties in 3 Forest Area

Exhibit

A

- About Us
- Accomplishments
- Membership
- News Blog
- Publications

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Solutions for Life on the Colorado Plateau

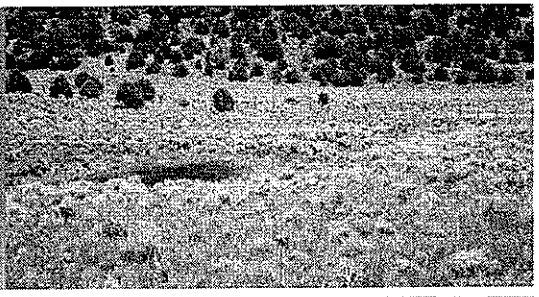


Home » Utah » Forest Restoration » Actions » The Grazing World Is Changing » Three New Forest Plans

- Issues
- Goals
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- Actions & Projects
 - The Grazing World Is Changing
 - » New Monument Plan
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 - » Livestock Collaborations
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 - » What Our Forests Could Be
 - » Reference Areas Project
 - » Photography Project
 - » Three Forests Coalition
 - Beaver Restoration
 - » Benefits of Beaver
 - » 2013 Project Activities

Contact Us
 2601 N. Fort Valley Rd
 Flagstaff, AZ 86001
 Phone: 928.774.7488
 Fax: 928.774.7570
 E-mail Us

- Utah Issues
 - Canyonlands Campaign
 - Wildlands Protection
 - Forest Restoration
 - Energy Development
 - Uranium Mining
 - State Trust Land Reform
 - National Monuments
 - Invasive Species



What Can You Do?

Tell the Forest Service what you know and think about livestock damage on the National Forests.

Click [here](#) to learn how.

Take Action

Volunteer

Volunteer and make a positive influence on the ground.

Spread the word.

SHARE

Join us on...

NOW UNDERWAY: Three New Forest Plans for Grazing

News Flash: Between now and **September 29**, the Forest Service is seeking **YOUR INPUT** (including your photos, observations, and opinions) on how livestock are impacting the Dixie, Fishlake, and Manti-La Sal National Forests in southern and central Utah.

Click [here](#) for a one-pager on how you can insure that the upcoming amendment of the three forests' plans for grazing will **significantly** change how cattle and sheep graze these three national forests.

This is the first and best opportunity in more than a quarter of a century to reverse the damage livestock are causing on the Dixie, Fishlake, and Manti-La Sal NFs.

Here is some background:

Currently, 97% of the Dixie, Fishlake, and Manti-La Sal National Forests in southern Utah are areas actively grazed by livestock (cattle or domestic sheep).

Partially in response to our [field documentation and reports](#) on problems with recruitment among riparian cottonwood, aspen, and willow, these three forests have committed to amend, starting in 2014, their 28-year old plans for grazing. The first step in this process is a review of livestock grazing effects on the three forests. You can help **NOW!**

What Our Forests Could Be

In 2013, skilled volunteer photographers helped us capture the ecological significance of ungrazed locations in and near the Dixie, Fishlake, and Manti-La Sal National Forests. The photos reveal the gap between the current depleted state far too common on the heavily grazed forests and the potential conditions in which our forests could be. The following interactive map takes you on a journey across the forests comparing ungrazed healthy ecosystems to grazed locations. Click the icon below to begin your journey.

Support Southern Utah Conservation

Your donations and membership dues make our research, monitoring, and restoration work in Utah possible.

Join / Donate

ABC guide to acronyms and abbreviations

Related Info

Project Areas
View the map of Utah Forest Program research areas.

Reports & Studies
Beaver Restoration

Cottonwood-Aspen-Willow

Reference Areas

Livestock Collaborations

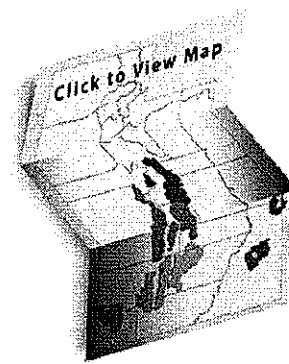
Other Projects



Beaver Best Management Practices: A Practical Guide to Living & Working with Beaver

Articles
View articles about forest management in southern Utah.

News from the Trust
Read about forest management issues in southern Utah.



Moving Our Forests to Where They Could Be

The Trust is developing a Sustainable Grazing Alternative to be considered in the EIS process that the forests will use to assess the consequences of various options for managing livestock. The alternative will be based on the important *Consensus* prepared in 2012 by the multi-stakeholder, multi-agency Collaborative Group for Sustainable Grazing in the National Forests in Southern Utah.

Elements that are fundamental to our alternative include (but are not limited to):

- **Management attention to values other than how much grass the cattle eat.** For instance, whether aspen sprouts can grow without continually being browsed, whether cheatgrass or dandelions are overtaking slopes and meadows, and whether stream banks have overhanging grasses for fish.
- **Pathways for diverse stakeholders (like you) to participate in grazing management decisions** rather than just the Forest Service grazing staff and livestock permittees.
- **A diversity of grazing arrangements,** including large areas allowed for uses other than grazing, closed allotments, and collaborative grazing experiments.

To receive updates from the Dixie, Fishlake, and Manti-La Sal National Forests regarding their process to amend their forest plans for grazing, e-mail John Zapell (jzapell@fs.fed.us) and request to be put on the list.

Please join the Trust in supporting positive proposals for how the Dixie, Fishlake, and Manti-La Sal NFs can wisely amend their forest plans for livestock grazing. Email [Mary O'Brien](#), indicating you want to be on the Trust's contact list to receive updates on the progress of these amendments. We will help you change the three forests for the better.

Grand Canyon Projects
 Colorado River Management
 Uranium Mining

Utah Projects
 Canyonlands Campaign
 Wildlands Protection
 Forest Restoration

Arizona Projects
 Forest Restoration
 State Trust Lands

Native America Projects
 Community-Based Development
 Renewable Energy

Plateau-Wide Projects
 Air Quality
 Renewable Energy

Kang & Two Mile Projects
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Water Supply Natural Quiet	Energy Development Uranium Mining National Monuments State Trust Lands Invasive Species			Volunteer Opportunities Visit our Volunteer Program site	
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Exhibit

B

**A One-Page Guide to
Your Aug 11-Sept 29, 2014
Opportunity to Tell the Forest Service What You Know and Think About
Livestock Damage on the Dixie, Fishlake, and Manti-La Sal National Forests**

The Dixie, Fishlake, and Manti-La Sal NFs have finally begun a process to amend their 29-year old forest plans for livestock grazing. The first step they are taking is to review livestock grazing effects on the three forests and they are asking **YOU** to “share information you may have about this subject” by **September 29, 2014**.

Here is a step-by-step guide to how you can help (and your help **IS** needed):

1. Read the Forest Service's Public Letter encouraging you to submit photos and other information about livestock impacts on the three forests (specifically, riparian vegetation; lakes, ponds, springs, and wetlands; stream channel habitat; and sagebrush grasslands), as well as “information about social, economic, and ecological values relevant to these ecosystems and the use of these ecosystems for livestock grazing.”
2. Read the Forest Service's Initial Review of Livestock Grazing Effects on Select Ecosystem of the Dixie, Fishlake and Manti-La Sal National Forests. It is far more candid than usual for the Forest Service.
3. Here's an unfortunate limit the Forest Service has placed on their request for information: They should also have included **meadows, grasslands, and the understory grasses, forbs, and shrubs of forests** (e.g., aspen, ponderosa pine) as habitats of concern. In reality, most cattle-use areas of less than 15% slope (and many of greater slope) are overgrazed, as long as livestock can get to them. There is no reason to limit concerns about current livestock grazing on the three forests to riparian vegetation, wetlands, stream channels, and sagebrush.
4. **Submit photos** (e.g., on a CD or DVD, on a pdf, or embedded as a Google link within your email) **and comments on social, economic, and ecological values** relevant to the use of the three forests for livestock grazing to:

grazingassessment@fs.fed.us

or by mail to

Attn: John Zapell Fishlake National Forest;

115 E 900 N; Richfield, UT 84701

or by fax

435.896-9347.

5. **Sign up for future notices** of how you can participate in this process of amending the three forests' plans for grazing by emailing Mary O'Brien of Grand Canyon Trust at maryobrien10@gmail.com or direct mail at HC64 Box 2604; Castle Valley, UT 84532. We will put you on our list of people interested in this amendment process, because it is likely to take at least two years, with additional steps, and we **ALL** need to hang in there to the end.

For some easy-to-read background on this process, see Three New Forest Plans on the Grand Canyon Trust's website.

SUMMARY: If you have ever seen damage to the Dixie, Fishlake, and/or Manti-La Sal National Forests due to livestock use; and/or you have comments on the social, economic, and ecological values relevant to livestock grazing on these three forests, **YOUR PHOTOS AND/OR INFORMATION ARE IMPORTANT**. Please start on this ASAP so you've helped by or before September 29.

Exhibit

C



United States
Department of
Agriculture

Forest
Service

Dixie National Forest
1789 N. Wedgewood Lane
Cedar City, UT 84721-7769
(435) 865-3700

Fishlake National Forest
115 East 900 North
Richfield, UT 84701-1847
(435) 896-9347

Manti-LaSal National Forest
599 W Price River Drive
Price, UT 84501
(435) 637-2817

File Code: 1910

Date: August 8, 2014

Dear Friends and Neighbors:

The Dixie, Fishlake, and Manti-La Sal National Forests are working together to assess whether our current forest plans provide adequate direction for managing livestock grazing in aquatic and riparian areas and sagebrush-grasslands. In the past year, we decided to initiate a review of concerns related to natural resource conditions on the ground that may be affected by livestock grazing, and whether there are potential deficiencies in the forest plans. The purpose of this letter is to inform you of our review, to provide you an opportunity to share information you may have about this subject, and to explain our next steps.

Why are we doing this?

We have heard public disagreement about the existing and desired rangeland conditions on national forest lands in southern Utah. These disagreements are based on several factors including:

- new science that was not available when the forest plans were approved in 1986,
- differing values about natural resources, and
- differing understanding of how forest plan direction applies to allotment-specific planning.

Because of numerous issues and conflicting views surrounding livestock grazing we requested a team of resource specialists to conduct an initial review to identify what if any changes in resource conditions have occurred between approval of the 1986 forest plans and today. The team was asked to identify resource concerns, determining whether they might be related to livestock management and what, if anything, in the forest plans' direction could be related to those resource concerns.

What have we done so far?

Where concerns about natural resource conditions were expressed, the team conducted a cursory review of existing conditions. The team based this review on readily available monitoring information; information about existing conditions, including observed changes in natural resource conditions; and new scientific information. The team also reviewed the forest plans and identified potential areas they felt did not provide adequate direction for managing resources potentially impacted by livestock grazing. This information is summarized in a document called "Initial Review of Livestock Grazing Effects on Select Ecosystems of the Dixie, Fishlake and Manti-La Sal National Forests" available upon request or online at <http://go.usa.gov/NnHQ>.

Our initial review indicates that we need to take a harder look at impacts of livestock grazing on riparian, aquatic, and sagebrush grassland ecosystems.



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A Summary of the Review

We identified that our existing forest plans do not have clear measurable desired conditions and descriptions for riparian and aquatic areas, and sagebrush grasslands especially in relation to use for domestic livestock grazing. Where we do have desired conditions described, they may not be effective at sustaining the natural resources, they conflict with other direction, or they are not supported by current science. This lack of information in the forest plans can make it difficult for land managers to determine appropriate use in some allotments.

We have also identified concerns about the condition of these areas as they exist in some specific and widespread locations across the three national forests:

Concerns about riparian vegetation include:

- Excessive bare ground which can lead to erosion, invasive plants being present, and aquatic habitat degradation.
- Lack of woody vegetation and diversity of ages and size classes which can lead to more erosion-prone streambanks, higher water temperatures and less value for wildlife species, aquatic habitat degradation.
- Unstable banks, which can lead to more erosion, lower water quality and aquatic habitat degradation.
- Lack of vegetation species diversity which can lead to lower forage production and less value for wildlife species.
- Lack of desirable deep rooted native riparian species which can lead to more erosion, channel incision, lower forage production, less value for wildlife, and aquatic habitat degradation.
- Conversion of hydric (water-dependent) species to upland species which can lead to more erosion and lower forage production.
- Vegetation in the transition area between the water's edge and uplands is lacking diversity and vigor which can lead to erosion, lower water quality, and aquatic habitat degradation and less value for wildlife species.

Concerns about lakes, ponds, springs, and wetlands include:

- Trampling and hummocking can lead to soil compaction, reduction in forage productivity, and increased erosion.
- Conversion of hydric to upland species (which are less productive for all species) and a general loss of what is currently a limiting resource for many other uses.
- Loss of wetted area that can lead to a potential reduction in ground water recharge, and loss of forage production as well as loss of wildlife habitat.
- Increase in invasive plant species.
- Excessive bare ground can lead to increased abundance of invasive undesirable plants and increased erosion.
- Lack of diversity of plant species or vegetation communities.
- Lack of diversity of species and age classes of woody species, when present.
- Potential for a loss of ground water recharge and a loss of available surface water for all users.

Concerns about stream channel habitat include:

- Compaction and bank instability.
- Decreased water infiltration rates and bank shearing.
- Bank incision, erosion and sedimentation.
- Loss of appropriate channel configuration (wider and shallower streams).
- Increased erosion, sedimentation and stream channel damage.

Concerns about sagebrush grasslands include:

- Lack of diversity and cover of perennial plant species, especially perennial forbs.
- Lack adequate herbaceous cover from predation during sage-grouse nesting and brood-rearing.
- Presence of invasive or undesirable vegetation.
- Lack a diversity of sagebrush age-classes.
- Sagebrush is decaying and not regenerating.
- Excessive bare ground and lack of leaf litter.
- Encroachment of pinyon-juniper, which can lead to less available forage.

What is the next step?

Based on the initial review, we have decided to conduct a more detailed assessment of this situation. For efficiency and effectiveness, we are conducting the assessment for all three national forests because of similarities in their natural resources and ecosystems. The primary purpose of the assessment is to determine whether there is a compelling need to change the forest plans with an amendment. The assessment will not be a decision-making document but instead will provide a rapid evaluation of existing and available information relevant to the concerns. The assessment will:

- ◆ describe the current conditions and trends of the resources we are concerned about, and what the forest plans currently prescribe for managing those resources;
- ◆ define key conditions necessary to maintain the riparian, aquatic, and sagebrush grassland ecosystems based on the best available scientific information;
- ◆ examine if the desired conditions, goals, or objectives stated in the current forest plans are adequate for today's management situations; and
- ◆ identify any preliminary needs for change in the forest plans.

If we determine there is a need to change any or all of the forest plans, we will initiate another public involvement process related to developing an amendment that would be applicable to all three national forests' plans. Developing an amendment would also require a National Environmental Policy Act environmental analysis, before any decisions can be made.

How you can be involved

We are looking for other current information you may have for us to consider for this assessment. Specifically, we encourage you to share material such as photos or data you may have related to the current conditions or trends of riparian vegetation, groundwater-dependent ecosystems, physical stream

channel conditions, or sagebrush grasslands. The initial review document described previously lists information that we already have available. We also encourage you to share information about social, economic, and ecological values relevant to these ecosystems and the use of these ecosystems for livestock grazing. To be most useful, please provide your input within 45 days of receiving this letter. We are anticipating that the assessment will be completed this fall.

Your input is important to us. We encourage contribution of information relating to the three-forest scale, individual forest-scale, as well as beyond the forest if related to the management of livestock grazing on the forest. Each plan is unique to the needs of the people and communities being served. The result of the assessment may be the preliminary identification of needs for change applicable to one, two, or all three forest plans.

You can submit electronic comments to: grazingassessment@fs.fed.us. Written comments should be addressed to Attn: John Zapell Fishlake National Forest, 115 E 900 N Richfield, UT 84701, or via Fax: 435-896-9347.

All comments, including names and addresses when provided, are placed in the project record and are available for public inspection.

FOR FURTHER INFORMATION CONTACT: Shirley Frank, Interdisciplinary Team Leader and Environmental Coordinator, TEAMS, Forest Service at 559-920-6358 or safrank@fs.fed.us or John Zapell, Public Affairs Officer, Fishlake National Forest at 435-896-1070 or jzapell@fs.fed.us.

Individuals who use telecommunication devices for the deaf (TDD) may call the Federal Information Relay Service (FIRS) at 1-800-877-8339 between 8 a.m. and 8 p.m., Eastern Time, Monday through Friday.

Thank you for your interest in this process.

Sincerely,

/s/ ANGELITA S. BULLETT

ANGELITA S. BULLETT
Dixie Forest Supervisor

/s/ ALLEN ROWLEY

ALLEN ROWLEY
Fishlake and Manti-La Sal Forest Supervisor

Exhibit

D

What Our Southern Utah Forests Could Be: A Photo Tour for You

Posted on July 31, 2014 by Grand Canyon Trust

Do you know why it's hard to know or even imagine what the three national forests of southern Utah (Dixie, Fishlake, and Manti-La Sal) would look like if they weren't grazed by livestock? It is because 97% of the 4.5 million acres of these forests are assigned to livestock grazing.

No other potentially destructive use (e.g., logging, motorized recreation, or mining) is permitted on anywhere near that proportion of the forests, even though livestock grazing can and often does profoundly alter the nature and functions of the forests. Negative impacts of grazing include increasing erosion along stream banks; trampling of moist meadows; reducing plant diversity; spreading invasive species; and removing wildlife hiding cover.

Our new "What Our Forests Could Be" interactive map below displays fine photographs of what the southern Utah forests look like in some of the few areas not currently grazed by livestock, as well as photos of comparable, grazed sites nearby. Short descriptions help you understand the importance of conditions shown in the photos.

This map is timely. In summer 2014, the three forests are will begin a public process by which they will change how grazing is managed on the Dixie, Fishlake, and Manti-La Sal forests. Click [here](#) to join with the Grand Canyon Trust in providing input on how grazing on these three forests should be better managed – including allowing for more areas to become voluntarily free of livestock grazing – thus allowing the forests of southern forests to become all they can be.

What Our Forests Could Be Interactive Map Photo Tour



Introduction

Click the image to enlarge.

Introduction

Because 97% of the 4.5 million acres of Dixie, Fishlake, and Manti-La Sal national forests are actively grazed livestock allotments, too few people (including Forest Service managers) know what an ungrazed meadow, aspen stand, sagebrush community, or riparian area looks like.

The photos linked to this map show some of the few ungrazed areas within the 3 Forests, compared with similar areas that are grazed. In their upcoming forest plan amendment, the 3 Forests can encourage use of voluntary permit retirements, and third party compensation to permittees to gain a greater balance between livestock-grazed and livestock-free areas.

Using the Map

Use the the arrows on the left and right of the image to flip through the photographs. The map zoom will automatically change to the location of the selected photograph as you move through the slideshow. Click the image

[Click here to view map in full-screen mode.](#)

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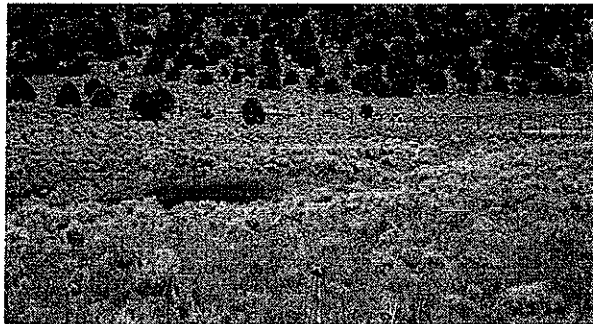
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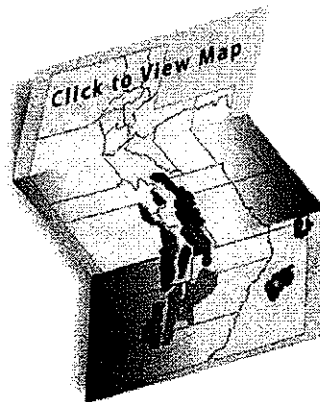
NOW UNDERWAY: Three New Forest Plans for Grazing

Currently, 97% of the Dixie, Fishlake, and Manti-La Sal National Forests in southern Utah are areas actively grazed by livestock (cattle or domestic sheep).

Partially in response to our [field documentation and reports](#) on problems with recruitment among riparian cottonwood, aspen, and willow, these three forests have committed to amend, starting in 2014, their 28-year old plans for grazing. The first step in this process is a review of livestock grazing effects on the three forests.

What Our Forests Could Be

In 2013, skilled volunteer photographers helped us capture the ecological significance of ungrazed locations in and near the Dixie, Fishlake, and Manti-La Sal National Forests. The photos reveal the gap between the current depleted state far too common on the heavily grazed forests and the potential conditions in which our forests could be. The following interactive map takes you on a journey across the forests comparing ungrazed healthy ecosystems to grazed locations. Click the icon below to begin your journey.



Moving Our Forests to Where They Could Be

The Trust is developing a Sustainable Grazing Alternative to be considered in the EIS process that the forests will use to assess the consequences of various options for managing livestock. The

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guide to acronyms and abbreviations

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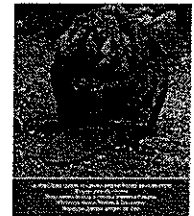
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Other Projects



Beaver Best Management Practices: A Practical Guide to Living & Working with Beaver

Articles

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alternative will be based on the important Consensus prepared in 2012 by the multi-stakeholder, multi-agency Collaborative Group for Sustainable Grazing in the National Forests in Southern Utah.

Elements that are fundamental to our alternative include (but are not limited to):

- **Management attention to values other than how much grass the cattle eat.** For instance, whether aspen sprouts can grow without continually being browsed, whether cheatgrass or dandelions are overtaking slopes and meadows, and whether stream banks have overhanging grasses for fish.
- **Pathways for diverse stakeholders (like you) to participate in grazing management decisions** rather than just the Forest Service grazing staff and livestock permittees.
- **A diversity of grazing arrangements**, including large areas allowed for uses other than grazing, closed allotments, and collaborative grazing experiments.

To receive updates from the Dixie, Fishlake, and Manti-La Sal National Forests regarding their process to amend their forest plans for grazing, e-mail John Zapell (jzapell@fs.fed.us) and request to be put on the list.

Please join the Trust in supporting positive proposals for how the Dixie, Fishlake, and Manti-La Sal National Forests can wisely amend their forest plans for livestock grazing.

Email Marv O'Brien, indicating you want to be on the Trust's contact list to receive updates on the progress of these amendments. We will help you change the three forests for the better.

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Way Overdue: A First-Ever Grazing Plan for Grand Staircase-Escalante National Monument

Posted on December 23, 2013 by Grand Canyon Trust

Almost every acre — 96.4% — of Grand Staircase-Escalante National Monument is in an allotment that is annually grazed by cattle, but there's no grazing plan for the Monument!

The Monument was designated in 1996, but controversies have bogged down development of any final grazing management plan. A new process to get a plan (and Environmental Impact Statement; EIS) has begun and the clock is ticking toward January 13, 2014 when your comments and ideas must be sent to the BLM for how cattle should be managed in the Monument.



Grasses on an isolated ridge above the Escalante River | Photo: Ellen Bishop

Biological soil crusts (Ouch! They get crushed under hooves), desert streams, grasses among sagebrush, flowers and pollinators that exist only in the Monument area — all need careful management of grazing but there is no plan to keep these. Moreover, the Monument has almost zero exclosures (a limited area from which unwanted grazing animals are excluded). There are few ungrazed areas to even compare against grazed areas in order to understand the impacts of grazing and the potential for restoration where grazing doesn't take place.



Intact biological soil crust on an ungrazed bench at the north end of The Hogback. | Photo: Ellen Bishop.

Check back [here](#) on January 1, when the Trust and [The Wilderness Society](#) will post the Sustainable Grazing Alternative: our best ideas of how grazing could and should be managed within the Monument.

Well, actually the ideas are inspired by the [2012 consensus recommendations \(PDF\)](#) of a multi-agency, multi-stakeholder Collaborative for Sustainable Grazing in southern Utah.



"Where's something to eat?"

We hope our January 1, 2014 alternative will be published alongside BLM alternatives for public response later in 2014.

You can help make that happen by commenting favorably on the alternative between January 1 and January 13 (the deadline for public scoping comments – the crucial initial step in the EIS process).

Check our [Facebook](#), [Twitter](#), and [Google Plus](#) pages on January 1, 2014 – we'll be posting a link to our comprehensive alternative for managing livestock on the Monument. This alternative will include pragmatic and reasonable solutions that work to protect the fragile ecosystems while continuing to manage grazing wisely.

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