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Title: Chairman

Comments: Please accept the attached comments on behalf of the Wyoming CLG.

The Coalition supports the Proposed Action. However, the USFS should closely consider the following comments and the issues identified in these comments to improve management and the analysis of the impacts of the Proposed Action and the durability and the Decision Memorandum.

The forage utilization standards in the EA do not conform to the forage utilization standard in the BT-LRMP. According to the BT-LRMP, forage utilization on upland range sites in satisfactory condition can be a maximum of 60%. BT-LRMP at 177. The EA, however, states that all allotments will have a maximum allowable use level of 50%. The EA shows that all of the allotments are meeting objectives and are therefore in "satisfactory condition." The EA, therefore, violates NFMA because the Forest Service has adopted a new standard on the allotments that directly conflicts with the BT-LRMP - a site in satisfactory condition is now held to a standard explicitly reserved for sites in unsatisfactory condition.

The Proposed Action requires "a minimum 4-inch stubble height retention along the greenline and/or a maximum of 20 percent streambank alteration in riparian areas." EA at 2 (emphasis added). Later the EA states that streambank alteration provisions in the EA are "guidelines" and, therefore, "flexible by definition and [] meant to generally constrain organizational

actions or define desired resource conditions (Forest Service 2015)." EA at 6.

The EA's statement that a "maximum" is a "guideline" is disingenuous. In fact, a "maximum" threshold operates to absolutely preclude alterations beyond 20%. It is, in other words, a mandatory constraint on livestock grazing across all of the allotments that is not found in the BTLRMP.

The Forest Service may not implement this standard without amending the BT-LRMP. 36

C.F.R. [sect]219.13 ("Except as provided by paragraph (c) of this section, a plan amendment is required to add, modify, or remove one or more plan components, or to change how or where one or more plan components apply to all or part of the plan area (including management areas or geographic areas)."). Just like the utilization standards discussed supra, if the stream bank alteration limit is not consistent with the forest plan, the responsible official must modify the decision document to make it consistent with the plan in place or amend the plan. 36 C.F.R. [sect]219.15(c) (1)-(4).

EA Fails to Disclose Application of Habitat Assessment Framework and Arbitrarily Applies Habitat Objective to Non-PHMA Without Disclosure To correct this section, the USFS must identify what sage-grouse habitat is on the allotments, how that habitat was identified, and disclose how that designation will impact the Proposed Action.

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