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Organization:

Title:

Comments: SBES Comments

Rob,

Please see SCCD's comments. Please let me know if you have any questions.

Sublette County Conservation District (SCCD) has the following comments in regards to the United States Forest Service (USFS) Draft Environmental Assessment on the Sweetwater, Blucher Creek, and East Squaw Allotments. SCCD has the mandate to assist, promote, and protect public lands and natural resources, soil, water, and wildlife resources, to develop water and to prevent floods, to stabilize the ranching and agriculture industry, to protect the tax base, and to provide for the public safety, health, and welfare of the citizens within Sublette County, Wyoming. SCCD offers the following general comments as well as the attached specific comments and supporting documentation regarding the DEA.

The Proposed Action suggests including a maximum forage utilization of 50 percent of key forage species in the uplands and a minimum 4-inch stubble height retention along the greenline. Tables 3 and 5 indicate that ground cover and species richness is satisfactory for all representative upland range sites. Utilization levels as described in Table 6 would then indicate under a rotational grazing system, 60% utilization would then be appropriate (East Squaw Creek) whereas a 50% utilization level would be appropriate for Sweetwater and Blucher Creek. SCCD encourages the USFS to allow the use standards setup in the current forest plan for allotments meeting standards. SCCD encourages the USFS to modify the forest plan if they feel that utilization levels need changed at the forest level. Streambank stability in the East Squaw Creek allotment is not meeting desired condition and a 6[rdquo] stubble height may be more appropriate (4[rdquo] stubble height currently suggested) until streambank stability is meeting desired conditions. SCCD would like to work with the permittees and the USFS to cooperatively look for solutions that would help the allotment work towards desired condition on the riparian areas.

The Proposed Action suggests a maximum of 20 percent streambank alteration in riparian areas. To be consistent with the Upper Green ROD, SCCD encourages the USFS to reference this as a guideline, rather than a standard.

SCCD encourages the USFS to reference the most current Sage-grouse decision and to align its management objectives with the correct decision.

SCCD appreciates the USFS giving the opportunity to review the above referenced EA and looks forward further discussions regarding these allotments. If you have any questions regarding our comments feel free to contact

Shari Meeks our Range Program Manager or myself at your convenience.

Sublette County Conservation District