

Data Submitted (UTC 11): 7/19/2020 6:00:00 AM

First name: Leonard

Last name: Walch

Organization:

Title:

Comments: My objection pertains to confusion or lack of consistency between the 2020 Forest plan and the FEIS as to how grazing allotments with allotment management plans completed under the 1995 Rescissions Bill and other ongoing allotments will be treated under the 2020 Forest Plan. Specifically Grazing guideline GDL 01 on page 109 of the 2020 plan states end of season stubble heights along the greenline applies to new grazing authorizations or reauthorization. My reading of this guideline implies that GDL-01 is not consistent with statements under Revisions of Allotment Management Plans section on page 218 of the FEIS where there is a statement that the 158 allotments with plans completed under the Rescission Bill will still be subject to Forest Plan direction through administrative modification of term grazing permits. Use of administrative modifications is not made clear in GDL -01 unless the adaptive management statement used in GDL-01 is another means of implementing administrative modifications and applies to the 158 allotments completed as well as the other 82 still needing updates. Further, the effects discussion on page 218 of the FEIS for effects common to all alternatives states that forage use at the site specific scale would only change during allotment plan revision whereas page 232 of the FEIS states that there could be reductions in livestock forage use based on needs to address riparian or TES concerns.

My suggestion to rectify this confusion is to include more specific wording in Forest Plan GDL-01 that makes it clear that the 158 allotments with earlier updated allotment plans, along with others in need of allotment plan updates, are all subject to use indicators such as greenline stubble height via administrative modifications to existing term grazing permits. Also please clear up the inconsistency on page 218 of FEIS where no reductions in forage use at the site specific scale are projected and the discussion on page 232 of the FEIS stating there could be some reductions in forage use and discussion on page 219 of the FEIS stating management adjustments may result in loss of head months for some permittees. From my perspective it would be most accurate to conclude in the FEIS grazing effects section that some changes in site specific forage use on the greenline and reductions in head months may occur for any of the 240 existing allotments through administrative measures.

The connection of my objection to my earlier comments for the draft plan and draft EIS is via my comment letter where I address page 89 of the Draft EIS discussing lack of consistency over what was stated for grazing guidance in the Draft Plan and effects for the Draft EIS. Also see my specific comments for page 23 under aquatics where I make reference to Grazing GDL -01 with concerns that GDL-01 in the Draft Plan only applies to new or revised allotment management plans. In that discussion I noted that adjustments to existing allotments can be made via annual operating plan for an existing term permit.

Finally, aside from the objection process I would like to note that in the response to comments portion of the FEIS my comments were not characterized in the table by name. However, I did find out that my comments were accepted. In my review of the final plan and EIS I could see in some instances how my comments were treated. However, because I could not see how my comments were classified or categorized it took much more time for me to see if my comments were addressed. I still am not sure as to how some of my comments were handled.