

Data Submitted (UTC 11): 2/15/2022 7:00:00 AM

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Comments: 2/15/2022 Comment on Ashley National Forest Draft EIS Appendix E. Ashley National Forest Land Management Plan (Chapter 2. Forestwide Direction) Page 45 Livestock Grazing (comments) The existing language on Desirable Conditions is appropriate and demonstrates the forests intent to preserve the landscape in a suitable way. The goals section on this page I believe needs some additional language in an attempt to explain and satisfy permittees concerns that reasonable steps and procedures have been followed in determining range conditions during the permitted season of grazing if in the forests determination that grazing is to be shortened during a given season. As such I recommend the following language be inserted into the plan: (The proposed insertions are underlined) Goals (FW-GO-LGR) 01 The Ashley National Forest will collaborate with livestock grazing permittees [UNDERLINE FOLLOWING] onsite where appropriate with [UNDERLINE END] ~~[STRIKETHROUGH FOLLOWING]~~ and ~~[STRIKETHROUGH END]~~ state, tribal and local governments to develop contingency plans that address wildfires, droughts, annual precipitation, or other events affecting the ability to graze allotments according to the terms and conditions of the permit. [UNDERLINE FOLLOWING] The onsite visit may include explanations through examples shown onsite why grazing may be curtailed in a given season or for subsequent seasons as needed. [UNDERLINE END] 02 The Ashley National Forest will collaborate with livestock grazing permittees, State tribal and local governments [UNDERLINE FOLLOWING] onsite where appropriate [UNDERLINE END] to develop monitoring methods and strategies and provide grazing management resources to permittees. [UNDERLINE FOLLOWING] The onsite visit may include explanations through examples shown onsite, the process by which decisions have been made to curtail or increase grazing in a given season by the forest. [UNDERLINE END] On the same page regarding guidelines: I will note recommendations in parenthesis and proposed additional language underlined Guidelines (FW-GL-LGR) 01 To ensure sustainability and resiliency of forage resources limit utilization of key forage species (please reference here, those [ldquo]key forage species[rldquo] you are referring to) to no greater than 50 percent of current year[rsquo]s growth, unless monitoring demonstrates a different allowable use level is appropriate. [UNDERLINE FOLLOWING] Monitoring shall include a demonstration to the permittee in an onsite scenario where appropriate, or photographs at applicable sites with explanations to demonstrate current conditions at a given site. [UNDERLINE END] 02 To ensure sustainability and resiliency of forage resources in riparian areas, leave a four-inch or greater stubble height of palatable herbaceous species at the end of the grazing season between greenline and bank full of stream systems, unless monitoring demonstrates a more appropriate stubble height. (comments) I recommend striking this entire section (02) for the following reasons: Most species of grasses or grass-like species that ungulates may consume may not grow more than 4 inches tall in a growing season especially in the High Uinta[rsquo]s Wilderness Area where elevation exceeds 10,000 feet. The growing season at high elevations rarely exceeds 60 days and frequently is less than 30 days. As such, to limit grazing based on an arbitrary number such as 4 inches is not appropriate where that level of growth is concerned. However, in scenarios where drought is a concern, mid-season of growth, livestock remaining in dry areas due to drought is also a detriment to the forage. This is why in my proposed changes and insertions above, an onsite meeting with all stakeholders is necessary to explain what is happening and what is necessary to preserve the landscape for upcoming seasons. As a consequence of this action, if this item is stricken, then the language on Table 21 of this Appendix E will need to be altered. This is on page 93 in the [ldquo]Indicator[rldquo] column. I recommend that this specific language be stricken as follows: Utilization of key forage species ([le] 50 percent or other allowable use level in AMP). ~~[STRIKETHROUGH FOLLOWING]~~ and stubble height ([le] 4 inch or other allowable use level in AMP) between greenline and bank-full streams systems ~~[STRIKETHROUGH END]~~ Lands Special Uses (pages 65-66) Proposed new language is underlined Guidelines (FS-GL-LU) 01 Vegetation treatment in corridors and along linear transmission facilities should meet facility safety requirements, provide for control of invasive species, and provide for revegetation to reduce visual impacts. 02 Buried utilities should be [UNDERLINE FOLLOWING] prioritized [UNDERLINE END] ~~[STRIKETHROUGH FOLLOWING]~~ used ~~[STRIKETHROUGH END]~~ instead of overhead to avoid potential conflicts with resources, such as scenic integrity, wildlife, or wildfire.

[UNDERLINE FOLLOWING] However, if burying new utilities is not practical, utilities may be placed above ground in rare circumstances to be determined by the stakeholders and forest management personnel in open discussion and consultation. In this circumstance, the proponents of the project shall, through consultation with the forest service personnel, develop features that camouflage the utility from view by humans and wildlife alike. [UNDERLINE END](comments)The reason I propose this is sometimes it just isn't practical to bury a transmission line, or other type of utility due to the terrain where the utility may be placed. This guideline is in accordance with desired condition #2 above.

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