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Comments: First and foremost, thank you so much for all of the resources put into this forest revision and for taking the time to look at both my and other comments.

A couple years ago, the worst drought in Utah's history occured. We have had terribly dry and hot years since then, and it is imperative that the changing climate is taken into consideration for the updated management of this forest. Under the guidelines for "Livestock Grazing and Range Management," the limit of cattle utilization is 50%, which is would generally be considered moderate stocking. Moderate stocking was found to be the most economically beneficial rate of stocking, however this finding was in lieu of a drought (Holechek et al.). Conservative stocking (35%) was found to forego, at worst, 10-25% of the profits of moderate stocking, but found to give "30-60% higher net returns than moderate stocking" when there is a drought. Given the past drought years and projections for more drought years in the coming years and the compilation of research, allowing 35%, rather than 50% of key forage to be eaten would be in the best interest of the ecosystem, as well as the socioeconomic well-being of the ranchers utilizing the public land.
There is also a lot of land that has a lot of bare dirt or grass mowed by cattle to its roots in rangeland as well as riparian areas. I worked this past summer doing MIMs for the Forest Service in the Copper Basin of Idaho, and never saw Nebraska sedge as low all survey season as I did on the Koosharem Allotment of Monroe Mountain a week ago. I saw a ton of Nebraska sedge (bluish color, channeled, and septate-nodulose) that was well below 4 inches. Given my experience doing MIMs over the summer, there seemed to be an excessive amount of bare ground; this is at odds with the "effective ground cover" grazing "timing, duration and intensity should be designed to maintain or improve," according to the guidelings of Livestock Grazing and Range Management. There were also a lot of sloughed and uncovered stream banks that didn't seem stable. I recommend increasing the minimum height of riparian grass that is allowed to be grazed to decrease the grazing of riparian plants such as Nebraska sedge and to decrease the amount of bare soil and destabilization of banks.

To encourage the intersection of the complex natural world and grazing, I strongly encourage a standard that requires permitees to try and use non-lethal methods to deter predators before using lethal methods. I understand the need to secure the safety of one's cattle, but if that can be done in conjunction with the natural world to the extent possible, that would signal a proper coexistence of humans on the landscape.

The draft also says that "new, reconstructed, or replaced livestock water developments shall be designed to be wildlife friendly," and I think it is harmful to wildlife, besides a minimalist mentality that I don't think lends itself to improvement to not make all water developments wildlife friendly. Because it will help prevent the death of wildlife and the relative ease of installment, I also recommend making all livestock water developments wildlife friendly.

Also, as water becomes more scarce, rather than extracting more water via new livestock water developments, grazing should become more conservative on the landscape, as mentioned earlier. In addition to that, there are no limits with respect to the amount of new water developments that can be done, and I think that water developments should be net neutral, so if one is added, an existing one is taken out. As there is less precipitation retention and potentially less precipitation itself, there will be less water to go around, and at the very least, we shouldn't be extracting more.

Thank you so much for your consideration,
Kevin Faeustle