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Comments: Comment on Ashley National Forest Draft EIS

Appendix E. Ashley National Forest Land Management Plan (Chapter 2. Forest wide Direction)

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Livestock Grazing

(submitted comments) The current language on Desirable Conditions is appropriate and demonstrates the forests plans to preserve the forest lands in a sustainable way. I think the goals section on this page needs some additional language in an attempt to address permittees concerns that protocol 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. I would suggest the following language be inserted into the plan: (The proposed language is underlined)

Goals (FW-GO-LGR)

01 The Ashley National Forest will collaborate with livestock grazing permittees onsite where appropriate with and 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. An onsite visit should include explanations through examples shown onsite why grazing may be curtailed in a given season or for subsequent seasons as needed.

02 The Ashley National Forest will collaborate with livestock grazing permittees, State tribal and local governments onsite where appropriate and possible to develop monitoring methods and strategies and provide grazing management resources to permittees. The onsite visit should 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.

On the same page regarding guidelines:

I will identify recommendations in parenthesis and proposed additional language and underlined

Guidelines (FW-GL-LGR)

01 To ensure sustainability and resiliency of forage resources limit utilization of key forage species (please reference here, those "key forage species" you are referring to) to no greater than 50 percent of current year's growth, unless monitoring demonstrates a different allowable use level is appropriate. Monitoring shall include a demonstration to the permittee in an (preferred) onsite scenario where appropriate, or photographs at applicable sites with explanations to demonstrate current conditions at a given site.

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.

(submitted comments)

I recommend deleting this entire section (02) for the following reasons:

1-Most grasses or grass-like plants that livestock and wildlife consume may not grow more than 4 inches tall in a growing season especially in the High Uinta'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. I feel it is wrong to limit grazing based on a random 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 forest resources 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 "Indicator" column.

I recommend that this specific language be stricken as follows:

Utilization of key forage species (= 50 percent or other allowable use level in AMP). and stubble height (= 4 inch or other allowable use level in AMP) between greenline and bank-full streams systems

