We are a family owned and managed cow/calf operation located in Mesa County. We have a grazing permit on the Uncompaghre National Forest. We are a multi-generational business. Our family has been here for a total of 5 generations. This legacy is intertwined into the GMUG and is important to us and the surrounding communities. The history, culture, and economics of the ranching community must be considered in the planning process.

It is important to us that the FS consider the value added to the landscape by ranchers as stewards of public lands. We improve habitat for wildlife and livestock by ensuring that water access is maintained or improved. We work to improve trails that provide access for outdoor enthusiasts and also allow for travel by wildlife through difficult areas. Ranchers contribute to the areas around the National Forests economically and socially. We conduct business and are active in our local community of Mesa County. For example, in 2016 our local expenditures in tires, fuel, and repairs were over $50,000. All of this was spent in Mesa County. The beef industry has over a $40 million economic impact in Mesa County according to the 2012 Ag Census. Many beef producers have Forest Service permits.

The biggest changes that we have seen over our lifetime on the Forests are the increasing number of people using the forest. As permitted users of the FS, we are accountable for our actions. We would like to see more accountability for recreational users.

Multiple use is important to us. There should not be one use that has higher priority than other uses. Managed well, all uses can enjoy and benefit from a healthy and productive forest.

While we see the value in Landscape Scale planning to allow for consistency of regulatory implementation, the approach of removing local field office planning through a prescriptive coordination is not acceptable. Local expertise has proven to better understand and have knowledge of conditions, local land use plans, regulations and laws. The plan must defer to local field office boundaries while still ensuring that there are specific standards and assessment for the quality and type of information being evaluated.

Using stubble height standards for measuring forage utilization instead of the current forage utilization by percent is unacceptable to us. Stubble height is determined by many factors including wildlife use, beginning height, & specific site diversity.

Using only Land Health Assessment (LHA) standards is of concern to us as well. Not meeting LHA standards does not take into account ecological site soil and hydrology. Specifically, research from the University of Wyoming shows that every acre will not meet the guidelines because of the limitations of the soil and timing of precipitation. Research has never determined what percentage of the landscape has to meet the guidelines to meet species’ needs. There is tremendous ecological variation naturally across the landscape and this variation lends itself to areas not meeting guidelines. Range science will indicate that soil constraints will determine site potential. Site specific data is most important and should be compared to the site potential. Looking at the trend of specific sites is the best way to measure how the resource is reacting to ongoing management.

We agree that adaptive grazing management is best for the resource, but it needs to have a scientific basis and must be considered on the base of specific site and trend data.

Thank you for your consideration of our comments.

Howard & Janie VanWinkle