Mesa County Cattlemen’s Association has approximately 300 members that include many of the ranching families that have grazing permits on the GMUG. Many of our members are multi-generational ranches that span 3-5 generations of sustainable beef production operations on the GMUG. On behalf of our many USFS grazing permit holders, we are asking that you include our comments in the assessment phase of the GMUG plan. The legacy of our members is intertwined into the GMUG and is important to the Association and the surrounding communities. The history, culture, and economics of the ranching community must be considered in the planning process.

It is important that the USFS 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. The beef industry has over a $40 million economic impact in Mesa County according to the 2012 Ag Census.

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, and 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 accepting the Mesa County Cattlemen’s Association comments in regards to planning on the Grand Mesa, Uncompaghre, and Gunnison Forests. We look forward to being full participants in the planning process as it proceeds to completion.