



## *Colorado Wool Growers Association*

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Grand Mesa, Uncompahgre and Gunnison National Forests  
Attn: Plan Revision Team  
2250 South Main Street  
Delta, CO 81416

December 7, 2017

Re: Grand Mesa, Uncompahgre and Gunnison National Forests  
Draft Forest Assessments: Rangeland Management – November 2017

The Colorado Wool Growers Association (CWGA) appreciates the opportunity to provide comments on the draft Forest Assessments: Rangeland Management report. Our Association remains concerned about the Forest Service's trend on placing a higher value on recreation than it does on its livestock grazing program, which is in violation of the multiple use and sustained yield clauses of Federal Land Policy and Management Act (FLPMA).

Another area of concern is the emphasis on public input versus stakeholder engagement. Public input is an important component of the planning process, but it must be coupled with an understanding of current regulations, and supported by factual data. The anti-grazing tone of the Rangeland Management report reflects poorly upon the Forest Service. The Forest Service staff work with permittees that are on the landscape throughout the year, and the GMUG office has on file data (Dave Bradford's work) that show livestock grazing benefits the Forest. Yet, this report highlights the negative anti-grazing comments submitted. It's a common trend that activists are more likely to engage in the public comment process than ranchers, permittees, and other citizens from our rural communities; *but* that doesn't mean the comments submitted by the "public" are accurate or correct. By providing emphasis to unsubstantiated comments, and not providing information to correct misconceptions, the Forest Service sets the agency up for more litigation.

Is there any site-specific data supporting the claim "sheep are destroying the alpine as well as riparian areas"? Sheep are known to have little impact on riparian areas so this comment bears scrutiny. "Some wanted to eliminate the use of livestock protection dogs".....why? Have "some" (how many is some?) had a negative experience or is this simply part of a larger anti-grazing agenda.

The push to leverage sheep producers off of their grazing allotments because of bighorn sheep continues to be a major threat to the domestic sheep industry. *Mycoplasma ovipneumoniae* is endemic in bighorn sheep populations across the West. We ask the Forest Service to support the 2014 *Memorandum of Understanding – Management of Domestic Sheep and Bighorn Sheep*.

Permittees should not be forced to reduce or lose their AUMs because of misconceptions regarding respiratory disease in bighorn sheep.

Table 11. Rangeland Vegetation Condition by Percentage of Geographic Area indicates the overall condition in most of the Forests is good. However, the undertone of the report, implies continued changes for permittees, and changes almost always result in a reduction of AUMs or shorter grazing season, despite good forage conditions. The references to stubble height are very concerning since it is not an accurate indicator of rangeland health, and it tries to quantify utilization by measuring something that isn't there.

It's likely that many commenters don't know about trail maintenance that permittees do in and outside of wilderness areas, or the benefits to wildlife from water improvements maintained by permittees. Our federal lands permittees are significant economic drivers in our rural communities, and contribute greatly to open space and wildlife habitat, while providing food and fiber to Americans and abroad.

In closing, we support the comments submitted by the Delta County Livestock Association, and management actions that support a robust livestock grazing program, and meet the mandates of FLPMA.

Sincerely,

*Angelo Theos*

President