Comments to the Rangeland Management Assessment Report

The undersigned are retired Forest Service Rangeland Management Specialists with over 80 years of experience managing rangelands in six states and five National Forests. Additionally, we spent well over 50 combined years planning and monitoring grazing activities here on the GMUG NF. We appreciate the opportunity to comment on the Plan revision. Due to our experience and knowledge, we will limit our comments to the draft assessment for Rangeland Management.

**Comments directed to the Assessment report:**

Generally, our reaction to the assessment report was positive. We were encouraged to see the overall trends in range condition had improved in recent years. That is to be expected when one acknowledges the implementation of improved grazing strategies across the forest during the past 40 years.

We were encouraged to see several references in Chapter 3: Sustainability, in which grazing management strategies have been adjusted to provide for improved timing, intensity, duration, frequency, and distribution. These concepts are crucial to meeting the needs of both society and the natural resources themselves.

We were dismayed to see that there are areas of the forest in poor condition and even worse, a downward trend. This appears to us to be unacceptable in the context of contemporary rangeland management. In an era of “adaptive management”, it would seem that such conditions would have been recognized and resolved, rather than allowed to progress to 2017.

Of particular concern to us, was the lack of reference to the current regional “Rangeland Analysis and Management Training Guide” that was formally adopted by the Rocky Mountain Region of the Forest Service in August of 1996. This guide was developed to modernize the rangeland inventory and monitoring procedures and to provide guidance for adaptive management. Many of the concepts contained in the Guide do not appear in the assessment Report. For example, the assessment discusses “allowable use levels” expressed as percentages use of forage. This is an anachronistic concept at best and has been surpassed by other, more valid methodologies such as the Grazing Response Index (more on this later).

**Comments directed to the Needed Changes to Respond to Rangeland Management Issues:**

To begin with, we would like to point out that rangelands tend to be disturbance driven ecosystems. Therefore, we need to be mindful of the fact that closing an area to grazing does not automatically lead to enhanced rangeland health. Indeed, it is often the reverse. Total protection from use often leads to a regression in plant vigor and ground cover. We have seen this phenomenon frequently when comparing conditions inside and immediately outside range exclosures , both here locally and across the West.

We strongly support the concept of managing for plant development and recovery. Grazing impacts are managed by controlling the time (duration) and timing(season) of grazing. This entails developing a grazing strategy that incorporates some combination of the following three primary principles of rangeland management:

1-Do not graze the same place at the same time year after year.

2-Defoliate primary forage species moderately.

3-Allow forage species to grow prior to grazing use and/or regrow following the use.

We know, based on many years of monitoring grazing use, that planning and implementing the above three principles will result in higher plant vigor, more ground cover, and increased species diversity-especially forbs. Overall, the landscape becomes more resilient to drought and provides improved nutrition for both livestock and wildlife. More importantly, the entire landscape is managed properly and conditions in one section are not sacrificed to enhance one specific parameter elsewhere as was proposed for reducing Kentucky bluegrass in the assessment. The objective of the grazing program than becomes rangeland health across the entire landscape as opposed to debating whether or not one small portion of the area in question received the bulk of the attention for that year.

Once the overall health of the rangeland environment has been secured, then it is a simple matter to alter time and timing of grazing to provide for specific (multiple use) needs of the resource. By knowing when certain plant species are susceptible to being impacted by grazing animals, riparian conditions can be enhanced, invasive species can be reduced, vegetative structure can be altered, and watershed function can be improved.

On the subject of allowable use standards and stubble heights, we strongly recommend that the Plan reaffirm the utility of the Grazing Response Index (GRI) for monitoring and evaluating the annual impacts of grazing. Our experience has shown that the GRI provides for assessing annual use in the context of when it occurred during the growing season. This then provides a direct link to the frequency, intensity and duration of the grazing use that year.

We much prefer adopting this concept to having “numbers” that become the objective of the grazing program. During our collective 100 plus years of experience working in the range management profession, we have seen similar attempts to adopt a simple, single number as the “ideal” parameter to be used to solve a problem. There follows a tendency to take this metric out of context and apply it to every possible situation across the west.

A good example is the 4 inch stubble height for wide bladed sedges that was developed in Idaho to loosely define proper utilization of riparian areas. Originally, the 4” stubble height was used as the first step in overcoming season long grazing use and providing forage plants the opportunity to recover from defoliation. Many agency specialists and members of special interest groups did not understand the origin or intent of the stubble height concept. As time went by, the 4” stubble height was applied to bluegrass in the riparian areas and eventually to upland bunchgrasses, neither of which was appropriate or valid. On some occaisions, agency specialists would arbitrarily increase the stubble height to 8” or even 10” with no justification other than the personal opinion that ”if a little bit is good more is better”. We watched the 4” stubble height evolve from a guideline to a rigid standard with no room for common sense adjustments due to plant species variation or more intensive grazing management strategies. It then became another hammer used to enforce grazing compliance or to reduce livestock numbers. During the 1990s, as rangeland managers began to manage more for plant development and recovery, the value of the 4” stubble height often became a moot point. However, it still remains a useful tool to indicate when the time is approaching to move livestock from a specific pasture.

We would hope that the new Plan would be direct in providing direction that permanent permitted stocking adjustments be made only after a thorough examination of condition and trend has been made. Along the same vein, it should be noted that assessing allowable use percentages and stubble heights and then blending them with GRI evaluations are not valid parameters to be used for stocking adjustments. These should only be used to make annual adjustments in management, such as where and when to graze a specific area.

In closing, we would like to reiterate our opinion that most of our country is not overstocked, but often it is under-managed. Since we all recognize that there is a tremendous variability in ecological site potential across this forest, a one size fits all approach to management is not conducive to meeting the needs of the resources in this modern era. Adopting the primary principles of contemporary rangeland management seems to us to be much more preferable to establishing restrictive standards and guidelines that are often outdated and hard to quantify.

Respectfully submitted

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