December 7, 2017

To Whom It May Concern:

I appreciate the opportunity to provide comments on the GMUG Draft Assessment. To begin, I'd like to remind everyone that the Forest Service is to be for multiple use as the Federal Land Policy and Management Act (FLPMA) designates.

Now, there are multiple issues I would like to address beginning with the fact that there has been public input from individuals stating a desire to see public grazing eliminated is a serious concern to me especially considering that numerous research papers and on the ground studies prove that properly managed livestock grazing contributes to healthy rangelands and subsequent watersheds. I think it is imperative to overall rangeland health to utilize proven science to manage all aspects of the rangelands and not allow decisions to be made based on unfounded emotion.

This leads to another issue of importance, which is the economic influence livestock grazing has on the National Forest Service system. Fees from livestock grazing is income the forest system doesn't get from any other source and it is a valuable contribution toward this government system's ability to function. Not only that, but permittees do significant work on maintaining forest service roads and trails, which everyone use. They also provide all labor for spring and other water developments and maintenance, which are used for wildlife, outdoor enthusiasts, and livestock. The forest cannot afford to hire people to do this manual labor. The money is not there. Permittees do the work for free and everyone from hunters and fishermen to bikers, hikers and ATV riders benefit from their labors. You also need to understand that grazing permittees on the GMUG want to manage the forests in the best way possible, not only because it is the right thing to do, but also because it affects their bottom line.

In addition to the economic impact livestock grazing on public lands has on the National Forest, it also has a major influence on the local economy. I am going to focus on Delta County; however, it is true that all of the GMUG counties rely heavily on livestock and therefore, livestock grazing on federal lands. Delta County livestock sales were $35,966,700.00 in 2011 according to an agricultural fact sheet CSU Extension put together in 2012. These dollars are circulated multiple times within the local communities. At that time, there were 17,000 beef cows and over 11,000 sheep and goats in Delta County. These economic impacts are huge and federal grazing is a major contributor to the success of these ranching businesses. With the total population expected to continue to grow, decreasing available farm and ranchland, it is so important that we continue to utilize these lands for forage to meet the demand of a growing population.

Stubble height and utilization are another concern I find in the draft plan. Returning to this criteria would take us back years. We have already established in the past that these do not indicate trend. Time and timing of grazing, while taking into consideration all environmental factors, including precipitation, must be considered and utilized to effectively manage grazing. Neither stubble height nor utilization alone can indicate if resource objectives are being met. Further, to narrow what we use as indicators to only include stubble height and utilization is like single trait selection. Single trait selection is when you choose progeny based on only one selection criteria. Short term, you begin to get the trait you are selecting for but over time, other traits decline significantly. We need to be looking at the big picture in range management and utilizing all trend indicators. In order to do this successfully on the GMUG, range management must be adjustable, consider plant recovery, and build on what several GMUG allotments have shown to work. Permittees have strong working relationships with their local Forest Service range cons and they work closely to adapt their allotment's rotation to account for current range conditions, drought and activity from the previous years.

In regard to the comments about permittees making wildlife friendly improvements. Permittees already include wildlife escape ramps and all water developments I am aware of provide access to wildlife at all times.

Respectfully,

Hannah Todd