December 7, 2017

Mr. Scott Armentrout

Forest Supervisor

GMUG National Forest

2250 Hwy 50

Delta, CO 81416

Plan Revision Team

GMUG National Forest

2250 Hwy 50

Delta, CO 81416

**RE: Comments on Draft Plan Assessment Efforts to Date**.

Dear Planning Team:

Thank you for the opportunity to submit these brief initial comments on the draft assessment as you move forward in the revision process. These comments are submitted on behalf of Virgil and Lee Spann Ranches, Inc, a Colorado corporation, headquartered at Gunnison, Colorado. Spann Ranches is a long standing livestock permittee on the National Forest, holding its first Forest grazing permit from 1927. We have an extensive and detailed history of operations on and in cooperation with the National Forest and additionally operate our private lands across Gunnison, Delta, and Montrose counties.

We cannot emphasize strongly enough the following key points that appear to be glossed over or only tangentially addressed in the assessment:

1. The role of the grazing permit and allotment system is key *and remains key* in stabilizing the rural communities that adjoin, surround and support the GMUG forest. There is an economic and environmental synergy and a co-dependence between the grazing allotments and the commensurate private ranch lands that are attached to those Forest allotments. No where is this more evident than in the mid-East River valley on the Gunnison National Forest where the largest remaining private open space and the least disturbed major river corridors, the lands not being converted to development, condos, or gentrified residential use,-- are those tied to the remaining Forest permittee ranches. Destabilizing those allotments and grazing permits will destabilize a great deal of key private land open space with major consequences to the surrounding communities.
2. While it is true that the number of permittees has shrunk, there is no real recognition across the assessment of the real improvement in the degree of resource professionalism, ecological skill, and management expertise that has occurred in the last decade among the permittee base that is charged with operating the grazing allotment system. Many of those charged with the active management of the grazing permits are highly educated, well trained individuals with extensive professional training and vast knowledge of the area they are operating cattle in. The continuing opportunity to work closely with them on the AOIs cannot be understated. It may be an area that is being missed in this planning effort by not directly reaching out to that source of experience and expertise.
3. For our part, we support and actively fund our own 3rd party professional monitoring of range conditions on our allotments. That monitoring gives us the ability to actually assess our activities and demonstrate that we are appropriately using the range resource. The plan should encourage, foster, and enable those kinds of activities to continue.
4. The assessment seems to give little analysis to the impact or relationship between the increasingly heavy use of localized critical winter range by elk and the survivability of the Gunnison sage grouse whose leks and brood areas often overlap with that critical winter range.
5. Grazing fees are set by an act of Congress and are outside the scope of this Forest Planning effort.
6. Existing grazing in federal wilderness areas in Colorado is expressly authorized by the Colorado Wilderness Bill of 1980 and the congressional guidelines referenced therein. Comments and analysis to the contrary are in conflict with this authority.
7. We believe that the range conditions across the major portions of the Taylor River Ranger District are improving considerably and that the seral stage objectives are being met. We have provided our local range staff with our monitoring studies which support these conclusions.
8. One of the greatest current threats to the sustainability long term of the vegetative resources is the tremendous growth of unregulated dispersed recreation in major riparian corridors on the Forest. It is the “buffalo commons” all over again, only this time not the cattle, but rather the dispersed recreation users of many different varieties. The cattle industry in the late 1930s to the 1950s matured and had to undergo serious reductions in use and greatly increased regulation to survive and protect the resource. The same is true today of the recreation industry. For example, more motorized trails might not be the most desirable thing for the Forest long term.
9. Livestock grazing remains a key component for vegetative management and in particular, is an important and cost effective tool for fire management and fire mitigation. Grazing reduces the available fuel load over time and is an effective component in the tool box for avoiding the catastrophic fires seen elsewhere in the west.
10. Our communities are moving toward more locally produced food being consumed locally. There is rapid growth of the “farmer market” segment in each of the major communities adjoining the GMUG. Grazing local forest and private lands contributes food and fiber to the nation and increasingly, to the local area. This value needs to be reflected more strongly in the Forest planning documents.
11. The plan should address what are the real funding requirements necessary to fulfill whatever objectives are set forth in the plan. What are the revenue sources to accomplish the objectives and standards set forth?
12. Strict adherence to stubble heights as a standard is inappropriate. We support the movement to more adaptive management types of objectives.

Finally, we reserve our rights under the regulations to further comment throughout the process and for such other administrative relief or action as might be necessary, authorized, or appropriate.

Thank you for the opportunity to make these initial comments and begin the process of working with the Forest to revise the Forest Plan.

Very truly yours,

/s/

Ken Spann for

Virgil and Lee Spann Ranches, Inc.

Headquarters Ranch

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