



COLORADO
Department of Agriculture

December 8, 2017

Mr. Scott Armentrout, Forest Supervisor
Grand Mesa, Uncompahgre, and Gunnison National Forests
2250 Highway 50
Delta, CO 81416

Dear Mr. Armentrout:

The Colorado Department of Agriculture (CDA) submits the following comments regarding the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) Draft Forest Plan Assessments.

CDA's mission is to strengthen and advance Colorado agriculture; promote a safe and high-quality food supply; protect consumers; and foster responsible stewardship of the environment and natural resources. It is with this mission in mind that we focus our comments on aspects of the Assessments related to the range livestock industry and natural resources within the analysis area. CDA supports sustainably managed livestock grazing as a congressionally mandated use of federal lands that is vital to the ranching industry and beneficial to wildlife and associated natural resources.

The Range Management Assessment (RMA) indicates that permitted grazing has decreased to the current level of 253,411 animal unit months (AUMs) of forage because of efforts to improve rangeland conditions by applying adaptive management strategies and as allotments were vacated or closed following an environmental analysis. At the end of the 2016 grazing season there were 150 active grazing allotments, 15 vacant allotments, and 18 closed allotments. The assessment should include a description of the conditions or reasons that led to these allotments being vacated or closed. There is a need for the revised forest plan to address whether or not grazing permits should be re-issued on these allotments.

The Benefits to People: Multiple Uses, Ecosystem Services, and Socioeconomic Sustainability Assessment states that the decrease in AUMs from 2005 to 2016 is primarily due to sheep allotments being closed and lists domestic sheep/bighorn sheep conflicts as a factor affecting grazing on public lands. A July 31, 2014, letter from Deputy Chief for National Forest System, Leslie Weldon clarified the importance of balancing multiple-use demands with management practices to support viable populations of bighorn sheep and a healthy domestic sheep industry. It further directed that best management practices should be effective in supporting both uses. There is a need for the revised forest plan to balance management actions that address bighorn and domestic sheep to ensure that the remaining segment of the domestic sheep industry is not put out of business due to expanding bighorn populations.



The RMA describes range condition and trend as the majority of acres being in good condition with approximately 1% of suitable/capable areas identified as fair and poor trending downward and poor trending stable. These conditions indicate that livestock grazing, as a whole, is being properly managed across the GMUG.

It is essential that the forthcoming forest plan and analysis consider relevant science regarding positive impacts that properly managed livestock grazing can have on ecological conditions. Research has shown that in arid and semiarid areas, grazing at use levels below 40 percent can have positive impacts to forage plants compared to exclusion of grazing.¹ Research conducted in western Colorado in mountain big sagebrush communities found no significant effects from 40-50 years of grazing exclusion on cover or frequency of grasses, biotic crusts, or bare soil and that grazing exclusion decreased above ground net primary production and biodiversity.² In a synthesis of scientific literature on long-term rest in the sagebrush steppe, Davies et al.³ found that long-term rest and properly managed grazing produced few significant differences, and in some situations, negative ecological effects from long-term rest.

In addition to the positive ecological effects of properly managed livestock grazing, maintaining viable ranching operations that include both GMUG and private land helps to preserve more expansive and unfragmented landscapes that benefit wildlife.⁴ Loss of access to forage on Forest Service land negatively impacts the economic viability of ranching operations and could lead to conversion or development of private rangelands that would fragment wildlife habitat. There is a need for the planning effort to emphasize the positive impacts of properly managed livestock grazing to correct the misinformed public opinions about livestock grazing described in the assessment.

CDA supports incorporating adaptive management strategies that allow for management flexibility into the revised forest plan. In order for adaptive management to be successfully implemented, a robust monitoring program must be in place with proper condition and trend indicators and adequate resources to collect the needed data.

Plan direction regarding forage utilization guidelines for livestock grazing should recognize that attainment of specific use levels is nearly impossible on a year over year basis due to the vagaries of climate. Researchers believe utilization levels should be a target across 5-10 year time periods, and there should be some tolerance for heavy grazing on a portion of a pasture (up to 30%).⁵ The revised forest plan should include this guidance for implementation of forage utilization guidelines for livestock grazing.

¹ Holechek, J.L., T.T. Baker, J. C. Boren, and D. Galt. 2006. Grazing Impacts on Rangeland Vegetation: What We Have Learned. *Rangelands* 28:7-13.

² Manier, D.J. and N. T. Hobbs. 2006. Large herbivores influence the composition and diversity of shrub-steppe communities in the Rocky Mountains, USA. *Oecologia* 146: 641. doi:10.1007/s00442-005-0065-9

³ Davies, K.W., M. Vavra, B. Schultz, and N. Rimbey. 2014. Implications of longer term rest from grazing in the sagebrush steppe. *Journal of Rangeland Applications* 1:14-34.

⁴ Maestas, J. D., R.L. Knight, & W.C. Gilgert. 2003. Biodiversity across a rural land-use gradient. *Conservation Biology* 17(5):1425-1434. doi:10.1046/j.1523-1739.2003.02371.x

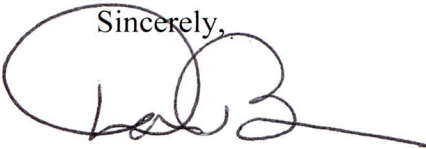
⁵ Holechek, J.L., and D. Galt. 2000. Grazing Intensity Guidelines. *Rangelands* 22(3): 11-14.

As desired conditions are developed for rangeland health indicators and plant community composition for the various ecosystems on the GMUG it is imperative that site potential and local knowledge are at the forefront of the discussion. A desired plant community must not differ from the potential plant community that current resources on a given site are capable of sustaining. Grazing permittees often have the most knowledge regarding current and historical vegetative conditions on a grazing allotment and should be included in discussions concerning site potential.

The RMA recognizes the importance of continued domestic livestock grazing on the GMUG to sustaining the social, cultural, and economic benefit for local communities in the analysis area. The importance of consistent access to forage on federal lands cannot be overstated for the ranching industry in Colorado. Properly managed livestock grazing is a valuable resource management tool that can improve wildlife habitat, biodiversity, and overall ecological conditions while providing cultural and economic benefits to communities. There is a need for the revised forest plan to include direction to ensure that herbaceous vegetation is capable of sustaining livestock grazing for the benefit of local communities while also helping to achieve other desired conditions.

Thank you for the opportunity to provide input on this important matter. CDA is interested in participating as a Cooperating Agency in the plan revision process. Please continue to keep us informed about the GMUG Plan Revision so that we can remain engaged in this important undertaking. Contact Mr. Les Owen at 303-869-9032 or les.owen@state.co.us for questions about these comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Don Brown", written over a large, light-colored oval shape.

Don Brown
Commissioner