December 7, 2017

To Whom It May Concern:

The Delta County Livestock Association (DCLA) appreciates the opportunity to provide comments on the GMUG Draft Assessment. DCLA continues to support full multiple use opportunities as the Federal Land Policy and Management Act (FLPMA) requires.

After reviewing the draft assessment, the Association sees multiple concerns that need to be addressed. First, the Summary of Public Input is very negative toward grazing, even going so far as to state in three locations that some individuals had a desire to see public grazing eliminated. This is a serious concern to DCLA considering that this idea is directly against FLPMA and considering the fact that there are numerous research papers and on the ground studies that prove properly managed livestock grazing contributes to healthy rangelands and subsequent watersheds. Furthermore, elimination of livestock grazing is not economic for the Forest Service. There would be a financial loss up front followed by rapid decline in overall rangeland health stemming from loss of road and trail upkeep and increased fire hazard. Permittees not only pay grazing assessments, but they also spend countless hours clearing trails for wildlife, livestock and recreationalists as well as developing and maintaining springs that are used by wildlife and livestock alike, thereby eliminating any reasonable cause for raising grazing fees. Additionally, without livestock, many trails in wilderness and non-wilderness areas would become impassable and with their limited resources, the Forest Service would be unable to compensate for the loss of livestock.

A second concern is the issue of stubble height and utilization. Science has already established that these are not trend indicators and should not be used as the index to measure range health. There are too many environmental influences to consider, including precipitation, plant diversity, wildlife use and elevation. In land management, everything that influences the big picture must be considered. In order to do this successfully on the GMUG, this plan needs to allow range management to be flexible. Permittees have strong working relationships with their local Forest Service range cons and together, they successfully adapt their allotment's rotation as needed to account for current range conditions, drought and past activity.

Finally, the local economic impact from livestock is crucial. According to a 2011 Agriculture Fact Sheet Developed by Colorado State University Extension Delta Extension Office, livestock sales in Delta County were $35,966,700.00, a 35% increase since 2008. Federal grazing is a major contributor to the success of these ranching businesses. The dollars from livestock sales do not end there. These dollars are circulated several times locally through grocery stores, restaurants, and fuel, as well as equipment and machinery purchases. Employment opportunities are created. Many of the GMUG communities rely on livestock activity such as this.

In closing, with their knowledge of current and historical management practices and of the land being managed, permittees need to be a resource used by the Forest Service for planning and management decisions now and in the future. They want to manage the rangelands to help them thrive not only because it affects their businesses, but also because it is the right thing to do.

Thank you for your time and consideration of this letter.

Respectfully,

Nate Adam

President, Delta County Livestock Association

Representing 43 Permittees and 26 Forest Service grazing allotments in Delta, Montrose and Gunnison Counties