



12/8/2017

Dear Forest Plan Revision Team,

I would like to thank you for the opportunity to make comments on your Draft Assessments and let you know that I appreciate your efforts and work that you have completed so far.

As a retired USDA Natural Resources Conservation Service employee and now in business for myself as a consultant and commercial weed applicator. I feel that working in the Gunnison Basin the past 32 years I have a gained a great working knowledge of the ecosystems that you are managing.

I would like to start with your assessment "Benefits to People" and say that I agree with much of this assessment. I believe the ranching community has been an integral part in working with the Forest over the years to help with the improvement in range conditions. That improvement in range conditions since 2005 to "more acres in good condition and fewer acres in fair and poor condition" and "conditions are trending upward or stable" shows the effort that the ranching community has done after the major drought of 2002 and through the drought of 2012 until now.

The Gunnison County Stockgrowers have shown their commitment throughout the years with their continued efforts on Gunnison Sage-grouse (GUSG) and helping to develop the Candidate Conservation Agreement (CCA) on public lands in the Gunnison Basin and then their commitment to implementation of the CCA. The local commitment by ranchers to the Certificates of Inclusion under the Colorado Parks and Wildlife (CPW)/Fish and Wildlife Service (FWS) Umbrella Candidate Conservation Agreement with Assurances (CCAA) on private lands is a highlight in Gunnison Sage-grouse conservation. The Stockgrowers have been one of the driving forces to get seamless management across private and public land boundaries and show their commitment to the stewardship of the land in the Gunnison Basin. This matches well with your statement related to the contributions of ranchers to economic activity and social sustainability in our community.

In your Terrestrial Ecosystem Assessment, I agree that livestock grazing can be an "ecosystem driver" on the landscape as you have stated. Livestock management can be a tool to affect positive changes on the landscape for all ecosystems and the species that utilize them. Grazing can be used to control invasive species, drive rangeland conditions in a positive trend and enhance wildlife habitat.

In almost all your assessments you state the need for more "Adaptive Management" in the planning and implementation process. This is all about working with people out on the landscape. By having that strong working partnership of your land management professionals and on the ground knowledge of the ranching community making decisions in a flexible manner to implement positive changes on the land. That is what natural resource management is all about.

In your discussions of recreation you need to emphasis the need for continued education of recreationists. By leaving gates open and cutting fences they not only affect the rancher, but they ultimately affect grazing management to the point that it can have a negative impact on all resources.

In your Range Management Assessment I would like to see more explanation that through the implementation of a grazing management plan livestock are generally only in one particular pasture on the landscape for maybe 2 to 3 weeks at a time during a 5 month season of use grazing permit from June through October. The increased management of livestock by utilizing; fencing, water developments, mineral placement, and time spent in the saddle is what is leading to increased rangeland health conditions across the landscape.



You mention that in the existing Forest Plan “The GMUG continues to manage for mid-seral stages/fair or better in accordance with the Forest Plan, recognizing that it may not be achievable on every acre.” The Gunnison Basin contains the most acres of excellent condition rangeland vegetation on the GMUG (Table 10, Page 10). It has a great diversity of conditions across the landscape and I believe that is what the Forest should be managing toward. Diversity across the landscape provides the most benefits to all species that occupy the landscape. As a land management professional I would never advocate to manage for one seral state in an ecosystem. The example that comes to mind is the Gunnison Sage-grouse: it utilizes a wide variety of the landscape depending on the time of the year and their life stage. They need sagebrush communities that are in all seral states and levels of condition.

Completing the grazing permit monitoring that I have been hired to conduct by permittees I have found that those permits have been meeting or exceeding the stubble height requirements set forth in the CCA for Gunnison Sage-grouse. The level of livestock use at sampling points has been in the light to moderate use levels. I keep finding signs of GUSG use right along with livestock grazing on the permits I have been working on.

In your Assessment of Aquatic and Riparian Ecosystems I agree with your consideration of a “revised direction for riparian management that is more site-specific and more flexible, with a focus on maintaining ecosystem processes rather than specific end states. ‘For example, direction to “maintain floodplain connectivity in riparian ecosystems where it is present, and restore floodplain connectivity when possible” would be preferable to “maintain all riparian ecosystems in at least an upper-mid-seral successional stage”. Note that vegetation indicators would still be needed to determine riparian health.”

Having been through the training to conduct Proper Functioning Condition Assessment of Riparian Areas and completing these assessments it can get very subjective. Everyone has different observation skills that get applied to what they think a good riparian should look like and they do not always know what the reference state should look like. An example is your assessment of cottonwood riparian systems. In a proper functioning condition those systems can look degraded because as you have stated “these ecosystems depend on annual to episodic flooding to provide a bare alluvium substrate necessary for the germination of cottonwood seedlings”. This compared to other riparian systems does not always look too great to some people.

I agree with your Invasive Plants Risk Assessment – Key Findings and Need for Change. I have completed some contract weed control in cooperation with the CPW Habitat Partnership Program and Forest over the past 6 years. Working in the Gunnison Basin for the past 32 years this is one of the biggest challenges I see moving into the future is the control of the spread of invasive species across the landscape. I have seen how changes in livestock season of use can be very beneficial to the control of certain invasive species. I know the budget and time commitment to treat invasive species with herbicides over the vast area the GMUG covers is not what it should be, but I do not know if it ever will be enough given the increase in use of public lands and the way these species can spread.

Thanks again for the opportunity for me to provide you my comments on your Forest Planning Process.

Sincerely,

*John M Scott*