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May 3, 2018

Derek Padilla, District Manager
Dolores Public Lands Office
29211 Highway 184
Dolores, CO. 81323

Re: Comment Submittal "Mancos Range Management Analysis"

Dear Mr. Padilla,

The Montezuma County Board of County Commissioners would like to take this opportunity to express our support for the renewal of term grazing within the Mancos Range Management Area. We will state again that we believe that continuation of livestock production clearly provides mutual benefits to both the San Juan National Forest and to surrounding private ranch lands that depend on grazing permits to retain their viability.

As you are aware, Montezuma County stands behind a multiple-use philosophy as established through our Comprehensive Land Use Plan. The continuation of grazing on the Mancos Range clearly falls in line with that philosophy, and strikes the appropriate balance between conservation and sustainable use.

Sustainable resource use on the San Juan National Forest is essential for the health and diversification of our economy, the continuation of our culture and traditions, and the long term protection of the San Juan National Forest's natural resources. We believe in the concept of a "working forest" where conservation is balanced with the production of useful natural resources for the benefit of the local economy and the American people overall.

The Montezuma County Commissioners would like to take this opportunity to state several principles that we feel apply to the Mancos Rangeland Management analysis as well as others.

1.) Authority: Grazing is a traditional cultural use that is statutorily sanctioned through the Multiple Use Sustained Yield Act (MUSA 1960), and through the National Forest Management Act (NFMA 1976). Even the first published USFS policy manual (1905) it was apparent that grazing cattle and sheep on national forests was essential to the American food supply, the local and national economy, and to western culture.

2.) Compatibility: Properly managed grazing is a relatively low impact, non-consumptive, sustainable use that has been a part of the western landscape for over 150 years now. Grazing on federally managed

lands plays a critical role in maintaining the vitality of the American livestock industry throughout the rural west, especially in communities like Montezuma County, which is over 73% federal.

The Mancos Landscape is a grazing evolved landscape which depends on “regular consumption of grasses and forbs, heavy hoof action, and deposition of nitrogen”(US Fish & Wildlife). Regular grazing intervals keeps native grasses vigorous, improves the protein content, exposes underlying plants and forbs which in turn are more healthy and vigorous. Grazing ungulates can also add and diversify biological activity and help close the forest nutrient cycle.

Grazing can also provide wildlife benefits by making native grasses more palatable to deer and elk who graze/ browse the tender new re-growth. Deer in-particular benefit from grazing because it exposes more low growing plants and forbs which are critical for mule deer forage.

The spread of noxious weeds is largely and erroneously pinned on grazing alone. While improper management practices can indeed provide a vector for weeds to expand, proper management can provide an efficient and effect means of slowing the spread of weeds. Furthermore consistent grazing can help to reduce fuel loading in the understory reducing the threat of wildfire from accumulated dead grass.

Grazing is a compatible use with all other forest uses including recreation and conservation. While there are always a few conflicts between recreationalists and livestock producers, most of the serious infractions we are aware of are related to fences being cut, gates not being closed, or motorized users creating damage to stock ponds and riparian areas.

We have never had any recreational user distinctly describe how grazing prevents or impedes recreational access or use, we strongly believe that the two uses are compatible, and that the solution to many of these issues are a matter of education and a willingness to work with each other.

The only tangible concern that we have really heard from recreationalist is from the Mountain Biking Community. Their primary complaint is that livestock pock mark trails and result in a rough ride. With all due respect to the Mountain Bike Community this seems a bit petty and out of line with reasonable expectations when they are riding a dirt trail in the mountains. Smooth rides are readily available elsewhere and any trail pockmarks are simply a part of the experience of Mountain Biking.

3.) Socio-Economics: Grazing on the San Juan Forest and adjacent BLM lands is a long-term and sustainable agricultural practice that helps to stabilize the local economy, and promote farm- to-table enterprises who focus on high quality, natural grass fed beef and sheep.

In addition livestock production creates demands for goods and services that support agriculture and ranching. In many cases grazing supports generations of livestock producers, as well as generations of individuals who provide goods and services to farmers and ranchers. This stabilizes our economy and local community.

We believe that public lands grazing are a perfect fit for the local organic and sustainable faming movement. Beef raised on public lands forage is about as organic and pesticide free as it is possible to get. In addition much of the beef produced locally is also processed, sold and consumed locally. These are value added components of the grazing program to our local economy.

Well managed livestock production is an important segment of the economy for rural Counties like Montezuma because it provides a long –term and relatively stable economic benefit. Grazing is more resistant to boom and bust cycles than energy, timber, mineral industries. It is even more resilient than

the recreation industry which is also subject to boom and bust cycles, fads and trends. But even in the middle of an economic downturn people still need to eat, and the demand for high quality naturally raised beef is strong and will continue to grow.

4.) Desired Conditions: Livestock producers are really in the business of growing grass and forage. It is the producer's best interest to maintain and improve range conditions. Term leases for ten years means producers count on their forage resources year after year and it does no good service to the producer to overuse pastures. We believe that by-in-large most producers are very interested in conserving their forage resources so that they can manage a long term sustainable business.

The real question that we all grapple with is...are the desired healthy resource conditions defined for this landscape reasonable and obtainable for this particular geographic location? And within the timeframe that has been established? Many other factors besides grazing are at play and all of those factors need to be considered.

We understand the need to set benchmarks in effort to ensure that the quality of the rangeland desire can be achieved as closely as possible, but after discussions with our permittees we are not convinced that we are all on the same page regarding our baseline conditions and desired outcomes. We desire closer and more frequent coordination with elected officials to try and build better consensus on realistic baselines and desired conditions.

The field trip and subsequent data review on the Glade is a good example. When the existing exclosures were examined there was virtually no difference between lands grazed for the last 80 years and lands within the exclosures. That does not mean the whole landscape is uniformly unaffected but rather that we need to focus on specific problem areas creatively and with reasonable approaches to help alleviate problems.

There will never be a pasture that has 100% of the available land utilized evenly or without some evidence of livestock usage one area more than another. That would be a completely unreasonable expectation. All landscapes are going to be a patchwork of areas where conditions are sometimes better than in other areas. We are concerned that the USFS and the public often focus on relatively small problem areas and paint the picture that the problems are widespread and representative of the whole pasture when the overall condition of the pasture may actually be quite good.

5.) AUMs/ Permitted Numbers: With the exception of the WWI timeframe the USFS has generally maintained the opinion that the western range is overgrazed. Most ranchers and historians agree that this was the case in the past. However it appears that the opinion that overgrazing is still a widespread problem is still very much alive within the USFS and it seems to be the policy of the USFS to always reduce numbers to please the environmental contingency if it can do so without a major uproar.

To avoid creating any general discontent by issuing overarching mandates, the USFS has appeared to pursue a policy of gradually reducing numbers downward on a "case by case basis". This has proven effective for the USFS and the numbers for all permitted livestock have consistently declined over the past 80 years across the west.

Most ranchers readily agree that overgrazing during the early part of the 1900's was real and valid concern. However vast improvements have been made on most of the western landscape since that time. Furthermore in the most badly damaged landscapes ecosystem functionality has been largely been restored. The Mancos Landscape is a good example of a landscape that is very ecologically functional and clearly suitable for grazing.

We understand and agree that there must be limits placed on AUM's and permitted use, however once cuts are made it is very difficult to bring numbers back up when conditions merit it due to a range of factors including; new personnel (often with personal agendas), the court of public opinion, inconsistent understanding/ interpretation of baseline data, unobtainable desired conditions, incomplete data, or ranchers who truly do not follow the rules and create problems for everyone else.

While cuts may be necessary in some instances we believe it would be better to keep the utilization and numbers at a high enough level to make seasonal adjustments based on conditions. Last year numbers could have probably bumped up by 20% or more and the conditions were such that the landscape could have absorbed those increases without any evidence that then numbers went up. This year we expect the exact opposite given the drought we are experiencing. Most operators are already planning to adjust stocking rates and take voluntary reductions in numbers and utilization. Those operators should be credited with those efforts and those efforts should be recognized by the public.

Generally when the public reviews an analysis like this it appears to them that all allotments get full utilization and numbers every year. The public has no way of understanding how hard permittees work to ensure that range conditions are kept to as optimal level as possible, nor how many permittees sacrifice their numbers or utilization to ensure good rangeland conditions for their future.

Rangeland conditions are far more important to our permittees that they are to the average citizen yet the public perception is that permittees are simply always taking advantage by over utilizing their range putting profit above all else. We can assure you that long term viability is far more important to most operators than short term profit.

6.) Monitoring: We are concerned that ongoing monitoring is not as uniform as it could be. Here is where coordination can help to define monitoring system that everyone agrees upon, and information can be flowing back and forth between permittees, the USFS, and elected officials.

As it is the monitoring does not seem uniform and especially not transparent. Data and documentation should always be available for review upon request by the permittee and local elected officials. We are confident that this situation can improve.

7.) Adaptive Management: This is a great concept and if fully explored can produce some real benefits. We do have concern however that some of the suggested practices may not be reasonable or economically achievable. Although we recognize the potential, requiring a full time rider for example, would not be something we could support.

We do support inventive ideas like piping water through flex lines to areas where utilization is not as uniform as it could be or where watering locations/ loafing areas etc. are not in open view of the public. Or the use of mineral/ salt blocks to encourage utilization and congregation in specific areas.

8.) Forage Reserve Allotments: On the surface this seems like it could be a good idea. However in practice this seems fraught with difficulties including competition over who gets to use the allotment etc. We do not support the creation of forage reserves and believe that each permittee will simply have to rely on their own devices if a wildfire or some other disaster makes utilization of an allotment impossible. This really seems more like a way for those who oppose public lands grazing to further restrict grazing.

We do not support the use of any vacant allotments as forage reserves, and any allotment that becomes vacant for any reason should be offered up to the next qualified permittee that shows interest.

9.) Wildfire / Invasive Plants: Fire frequency, intensity, and behavior are dictated largely by type, condition, and quantity of vegetation (DiTomaso and Johnson 2006). Grazing alters fuel-load characteristics by changing plant community composition, structure, and biomass. Altered fuels can change fire-return cycles, fire intensity, and spread patterns. This can result in further changes in plant community composition as fire-intolerant populations give way to fire-tolerant ones. Grazing can be used to intentionally manipulate fire fuel-loads in prescribed burning programs (DiTomaso and Johnson 2006). Grazing can be used to intentionally manipulate fire fuel-loads in prescribed burning programs (DiTomaso and Johnson 2006). (US Fish & Wildlife)

The forces and influences discussed above make grazing a valuable vegetation management tool. While the misuse of domestic livestock grazing can increase populations of invasive plants, proper grazing management can promote desirable vegetation and reduce invasive plant populations.

9.) Coordination/ Outreach: We would like to thank the USFS for meeting with us for a “boots on the ground” field trip up on the Glade, and we would suggest another similar field trip to the Mancos Landscape. It would help to see first-hand what the physical concerns are, and to visit with permittees to try to develop better relations and to brainstorm on possible solutions to any concerns that are evident.

Thank you for this opportunity to comment on behalf of the Montezuma County Commissioners.



James Dietrich
Montezuma County Natural Resources

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