



COLORADO
Department of Agriculture

May 30, 2018

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 Notice of Intent to revise the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) Forest Plan and associated scoping materials.

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 provide comments to the scoping materials that provide the foundation for the Forest Plan revision.

Forest Plan Vision, Roles, and Contributions

This section recognizes the importance of GMUG's rangeland resources to the ranching industry in the planning 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. Properly managed livestock grazing has positive ecological effects^{1,2,3} and helps to preserve more expansive and unfragmented landscapes that benefit wildlife.⁴ The vision for the revised plan should include maintaining or improving the rangeland resource in partnership with a viable livestock industry.

Key Needs for Change

This section calls for a more strategic, adaptive direction than the current overly prescriptive plan that limits flexibility. CDA supports incorporating adaptive, outcome based management strategies into the revised plan. Essential to the adaptive management process is flexibility or

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. Rimbe. 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



authority to alter management prescriptions in response to success or failure in achieving resource objectives. Additionally, this type of management requires a robust monitoring program to be in place with proper condition and trend indicators and adequate resources to collect the data necessary to evaluate and adjust management direction.

CDA supports management of National Forest System (NFS) lands under the principles of multiple use and sustained yield as congressionally mandated by the Multiple-Use and Sustained-Yield Act of 1960⁵ and further codified by the National Forest Management Act of 1976⁶ (NFMA). NFMA provides clear direction regarding the equality of multiple uses, “...provide for multiple use and sustained yield of the products and services obtained therefrom in accordance with the Multiple-Use Sustained-Yield Act of 1960, and in particular, include coordination of outdoor recreation, range, timber, watershed, wildlife and fish, and wilderness....”⁷ Coordinate is defined as equal in rank, quality, or significance.⁸ Through NFMA it is clear Congress intended that NFS planning coordinate and consider each of the listed multiple uses equally. There is a need for the revised plan to not only consider but provide for each of the multiple uses without prioritizing specific uses across the planning area.

The Range Management Assessment 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. There is a need for the revised forest plan to address whether or not grazing permits should be re-issued on closed or vacant 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.

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

⁵ 16 USC §528-531

⁶ 16 USC §1601-1614

⁷ 16 USC §1604(e)(1)

⁸ <http://www.merriam-webster.com/dictionary/coordinate>

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.

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 desired conditions.

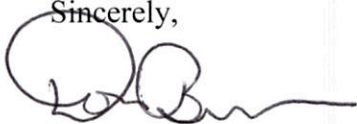
When considering plan direction regarding wildlife and livestock conflicts, CDA requests to be considered an appropriate agency for coordination on this topic. Staff can provide expertise in herd health and management for issues concerning forage competition or disease transmissibility, and CDA has statutory jurisdiction over control of animals that depredate on livestock.⁹

Management Area Framework

Larger, less prescriptive management areas would be more conducive to applying adaptive management on the GMUG. A less complex management area designation structure provides managers with flexibility to apply the appropriate management direction to resources based on documented need, not static lines on a map. Overlapping management areas should be avoided in the revised plan because this creates unneeded complexity that overcomplicates land management with no benefit to resource objectives.

Thank you for the opportunity to provide input on this important matter. CDA looks forward to participating as a cooperating agency as the plan is developed and analyzed. 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', with a long horizontal flourish extending to the right.

Don Brown
Commissioner

⁹ CRS 35-40-101