



**COLORADO**  
**Parks and Wildlife**  
Department of Natural Resources

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Mr. Kyler McCarrel  
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RE: Dry Fork allotment scoping

Colorado Parks and Wildlife received notice that the USFS is proposing to reauthorize domestic livestock grazing in the Dry Fork allotment within the Paonia Ranger District. We appreciate the opportunity to participate in a future Allotment Management Plan (AMP) and helping to ensure that wildlife habitat is adequately considered. We support a revised AMP that would use an adaptive management strategy focused on managing livestock grazing variables such as timing, duration and intensity, with an objective of providing vegetation a rotational opportunity to either grow before grazing or regrow after grazing. Desired conditions would be identified, and condition and trend monitoring would be prescribed to determine if desired conditions are met.

We recognize the challenges of managing range health during long-term periods of drought and the importance of providing grazing on public lands. In some instances, the ongoing drought conditions combined with the current stocking rates have likely contributed to historic and on-going resource overutilization. We applaud the USFS's efforts to improve range conditions, and would respectfully submit that achieving that goal will likely require changes to traditional grazing practices including an assessment of historical stocking rates and prescribed intensity and duration of use.

It is also important to mention that CPW receives complaints annually from big game hunters regarding the number and distribution of cattle in the fall, as well as the timing of the fall gather on public land allotments. Those comments generally focus on the perceived negative impacts to animal distribution and hunting experience resulting from livestock operations and activity. Some public land hunters have adjusted their season of hunting because they prefer to avoid conflicts with livestock and the fall gather. Presently, cattle are gathered during first rifle season (*opening day was October 15th in 2022*) promoting conflict with hunters. Removing cattle a week earlier would help reduce hunter conflict.

We appreciate the continued efforts of the Forest Service and the Paonia Ranger District in managing grazing allotments for wildlife, the livestock industry and the public.

Please contact District Wildlife Manager Andrew Taylor if you would like to discuss further.

Very Respectfully,

Andrew Taylor  
District Wildlife Manager-Paonia

