Data Submitted (UTC 11): 4/16/2021 11:00:00 AM
First name: Amber
Last name: Swasey
Organization: Mesa County, Colorado
Title: Sr. Managing Analyst
Comments: Please see the attached comment letter from Mesa County, Colorado.

Thank you for the opportunity to comment on the proposed Rangeland Management Directives for the U.S. Forest Service ([ldquo]USFS[rdquo]). Mesa County ([ldquo]Mesa County[rdquo]) appreciates the cooperative relationship Mesa County has with the USFS pursuant to the Memorandum of Understanding between Mesa County and the USFS, MOU # 18-MU-11020402-017 ([ldquo]MOU[rdquo]).

Mesa County acknowledges the importance of federal lands to the ranching industry. In accordance with the Mesa County Resource Management Plan, we offer the following comments:

I. Mesa County is supportive of any effort to streamline permits and ensure they are processed in the most efficient manner possible. This includes approvals for allotment permits, proposed range improvements, and the construction, maintenance, or expansion of irrigation distribution systems (i.e. canals, ditches, pipelines) to private lands.

II. Livestock grazing management decisions should be made to ensure that overall rangeland health is being maintained through monitoring and implementation of well-designed livestock grazing management plans that encourage the overall health of all natural resources.

III. Rangeland monitoring programs should utilize currently accepted scientifically based monitoring methods and return intervals, consistent with standards of the Data Quality Act, and utilizing properly trained rangeland personnel with an understanding of rangeland and its management to ensure proper collection and analysis of data.

IV. Given the continued drought, as well as the quantity and intensity of wildfires in the west, Mesa County supports the creation of adaptive grazing management plans that allow permittees to respond to changes in resource conditions. These plans should include focused monitoring, triggers and responses, and alternative management plans. The same flexibility should also be available in response to noxious weed management on USFS lands.

a. Determining grazing rest prescriptions related to either wildfires or prescribed burns should be conducted on a site-specific basis in consultation with the permittee.

b. Full site-specific economic and resource analysis of suspending grazing for allotment closures must be completed in accordance with the National Environmental Policy Act ([ldquo]NEPA[rdquo]) prior to the closure.

V. Mesa County does not support allotment retirements.

VI. The closure of historic trails, stock driveways, or roads should not be done without a thorough travel management review that allows stakeholders an opportunity to evaluate and provide comments.

Finally, Mesa County strongly believes any decision needs to be based on early and consistent communication with permittees, as well as local and state governments. Agriculture, as a whole is an

important component of our region[rsquo]s economy, culture, and lifestyle and an efficient, logical program will not only benefit the permittees, but also the USFS and the rangeland that it manages.

and the rangeland that it manages.

Thank you for the opportunity to comment on the proposed Rangeland Management Directives for the U.S. Forest Service ([ldquo]USFS[rdquo]). Mesa County ([ldquo]Mesa County[rdquo]) appreciates the cooperative relationship Mesa County has with the USFS pursuant to the Memorandum of Understanding between Mesa County and the USFS, MOU # 18-MU-11020402-017 ([ldquo]MOU[rdquo]).

Mesa County acknowledges the importance of federal lands to the ranching industry. In accordance with the Mesa County Resource Management Plan, we offer the following comments:

I. Mesa County is supportive of any effort to streamline permits and ensure they are processed in the most efficient manner possible. This includes approvals for allotment permits, proposed range improvements, and the construction, maintenance, or expansion of irrigation distribution systems (i.e. canals, ditches, pipelines) to private lands.

II. Livestock grazing management decisions should be made to ensure that overall rangeland health is being maintained through monitoring and implementation of well-designed livestock grazing management plans that encourage the overall health of all natural resources.

III. Rangeland monitoring programs should utilize currently accepted scientifically based monitoring methods and return intervals, consistent with standards of the Data Quality Act, and utilizing properly trained rangeland personnel with an understanding of rangeland and its management to ensure proper collection and analysis of data.

IV. Given the continued drought, as well as the quantity and intensity of wildfires in the west, Mesa County supports the creation of adaptive grazing management plans that allow permittees to respond to changes in resource conditions. These plans should include focused monitoring, triggers and responses, and alternative management plans. The same flexibility should also be available in response to noxious weed management on USFS lands.

a. Determining grazing rest prescriptions related to either wildfires or prescribed burns should be conducted on a site-specific basis in consultation with the permittee.

b. Full site-specific economic and resource analysis of suspending grazing for allotment closures must be completed in accordance with the National Environmental Policy Act ([ldquo]NEPA[rdquo]) prior to the closure.

V. Mesa County does not support allotment retirements.

VI. The closure of historic trails, stock driveways, or roads should not be done without a thorough travel management review that allows stakeholders an opportunity to evaluate and provide comments.

Finally, Mesa County strongly believes any decision needs to be based on early and consistent communication with permittees, as well as local and state governments. Agriculture, as a whole is an

important component of our region[rsquo]s economy, culture, and lifestyle and an efficient, logical program will not only benefit the permittees, but also the USFS and the rangeland that it manages.

and the rangeland that it manages.