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Organization:

Title: Grazing Permittee

Comments: Dear USFS Department of Agriculture,

Thank you for the opportunity to review and comment on the North Valley Cattle and Horse Allotments, Proposed Action and Preliminary Alternatives dated February 2024.

My name is Burt Guerrieri. I am the current Grazing Permittee on the Lost Canyon Permit, Silver Springs, and Esty Pasture. I have been on this Permit since about 2007. My comments will be limited to these Permit areas that I graze.

1. Page 10, Allowable Use, last Bullet: My observations over my entire 44 years in ranching is that cattle won't eat willows unless the cattle are extremely confined and lack availability of forage. And cattle just never eat aspens. Why is this even included in a discussion of grazing cattle? Grazing of willows and aspens is from elk and deer, not cattle. It's inappropriate to hold cattle grazing accountable for elk and deer grazing.
2. Page 11, Range Improvements, last paragraph: This paragraph should be changed to allow all trees to be cut within 15 feet of centerline. At the minimum it is necessary to cut trees to allow ease while moving cattle along a fence line. This minimum is at least two cows' width. To have cattle crowding a fence damages the fence and significantly reduces the effectiveness of the fence. A wide enough path also provides safety for horseback riders to follow the fence when trailing cattle.
3. Page 11, Range Improvements: The map on page 4 in this Document is inadequate to effectively comment. The size of the map and the coloring of the fences is too small to accurately review both current fences and proposed fences. This map needs to be further reviewed by USFS staff and myself, and likely be revised. It appears that not all stock watering improvements are on this map. Additionally, the map on page 4 does not accurately depict the Section 36 School Section fences nor boundaries. This School Section has 80 acres of USFS land fenced inside the School Section fence. These 80 acres must be shown on the map and be clearly designated as part of the Lost Canyon Grazing Permit.
4. Page 11, Range Improvements: To be clear, working together with USFS Range Staff, there is only one fence that currently has plans to be physically built. This fence is a permit boundary fence between the Esty Pasture and Taylor Park Grazing Pool. All other fences in this Document that are characterized as "proposed fences" would be better served by calling them "possible future fences".
5. Page 14, Second Paragraph: I Googled the Definition of a Stream Reach: In practical use, a reach is any length of a stream or river. The term is often used by hydrologists when they're referring to a small section of a stream or river rather than its entire length. All definitions of a "Stream Reach" require there be a creek or stream or river. See specific reference sites below[hellip]
6. Page 14, Second Paragraph: The Hydrology Report provided to me by the USFS lacks historical perspective, is misleading, is illogical, and consistently presents an undisguised anti-grazing bias. I will address Fisher Gulch and Lost Creek separately.

Lost Creek

Here is a paragraph from the Hydrology Report, page 3:

Tributary to Lost Creek- We believe the current grazing management has triggered a static or downward trend toward properly functioning condition. The tributary to Lost Creek was functioning at risk due to effects of current and historic grazing (appendix 1). The current grazing in this reach has led browsing of willows and aspens and trampling of the stream bed and banks. Several active headcuts were found along the survey reach which have led to a shift to more mesic vegetation, away from more effective stabilizing riparian obligate vegetation such as

sedges. Because of extensive hoof shear in channel, active headcuts and local dewatering of the riparian area, and uncertainty of extent of new vegetation recruitment due to browsing and other impacts, the stream system is at risk of gullying but overall the channel is not incised. This is remarkable because of the extent of headcutting. The reach had several headcuts that created scour pools in the stream bed that were discontinuous, with exposed fine soils. Soil loss was not addressed by the survey but is a critical concern. The headcuts were probably tied to current and historical disturbance in the channel and banks, but many have not migrated appreciably in most cases. However, several of the headcuts are at risk of further incision and migration.

Comments

1. First, there is no "Lost Creek". This name apparently is invented for this Hydrology Report to imply there is a creek. In fact, after snow melt there is no running water in the referenced tributary or anywhere above or below it until you reach the Gunnison River approximately 5.4 miles to the west. There are references to "creek", "stream", and "stream bed" that totally mischaracterize and misrepresent the on-the-ground reality of no live water.
2. The Hydrology Report totally ignores the basic reality of erosion. When the snow melts or when there is a flashflood, water coming down any drainage will absolutely and always cause erosion. This is a fundamentally natural occurrence. There are approximately 1,400 acres which lie above this site and the topography is such that almost the entirety of these acres funnel snow melt and heavy rain down through the narrow area of concern in this Report[hellip] causing erosion. The fact that the Hydrology Report failed to state and quantify the quite large area that funnels water down is misleading and negligent. The Hydrology Report shows its negative grazing bias by suggesting that cattle are the significant factor affecting cut banks and erosion.
3. The Hydrology Report erroneously states that cattle are eating willows and aspens. Then it is implied in the same sentence that cattle are trampling the stream bed and banks while eating willows and aspens. Again, cattle don't eat willows and aspens! And there is no stream! Elk and deer eat aspens and willows and they have hooves. By failing to acknowledge this reality, this Report again exposes its negative bias against cattle grazing.
4. The Hydrology Report ignores that below this site there exists a couple of hundred feet deep ravine, called Lost Canyon. This canyon clearly had to be cut by water erosion over many centuries. Lost Canyon has no running water, so it must have been cut by this same funneling effect of the snowmelt and rain. It is illogical to me that the Hydrology Report can conclude that the erosion they are observing is a direct result of cattle grazing when this erosive process clearly has been happening for multiple centuries.
5. Here is a paragraph from the Hydrology Report, page 4:

One other source of risks on the upstream end of the reach we surveyed was a constructed earthen dam on a recently re-constructed stock pond located within the channel floodplain. This poses a risk of sedimentation for the channel during higher flood stage.

I am not an expert on "sedimentation". But doesn't a stock water dam slow runoff and therefore slow sedimentation? And wouldn't the dam slow runoff and slow erosion? Furthermore, a stock pond dam is so microscopic in the whole context of an eleven-thousand-acre permit that it hardly poses mention, unless the Hydrology Report was just looking for something else negative to print.

Conclusion

As a result of the Hydrology Reports anti-grazing bias, ignoring historical perspective, lacking willingness to address the drainage as a whole system, and lack of understanding of cattle grazing, it is illogical and inappropriate to accept their conclusion on this site that "the current grazing management has triggered a static or downward trend toward a properly functioning condition". Furthermore, this site cannot be considered a "Stream Reach", which the Hydrology Report uses as a foundation for its comments.

Fisher Gulch

Here is a paragraph from the Hydrology Report, page 4:

Overall most areas of the stream had abundant vegetation for maintenance of the riparian area stability. However we observed areas where willow were dying off possibly due to local groundwater fluctuations

Comments

1. Here again the Hydrology Report completely misrepresents the fact that there is no stream and no live water. There is no live water above this site and the nearest running water below this site is the Gunnison River approximately 1.4 miles below and to the west.
2. The Hydrology report ignores the approximately 2,400 acres above the referenced site which all drains directly down with a funneled effect. In Fisher Gulch, all snowmelt runoff and heavy rain are funneled through this narrow channel that is in places only fifteen feet in width. It is actually quite remarkable the lack of dramatic erosion here given the scope of the topography. By ignoring this dramatically large area that funnels water, the Hydrology Report demonstrates a lack of topographical perspective.
3. Here, as with Lost Canyon, there is a couple hundred feet deep and very steep ravine below this site that has been carved through hundreds of centuries of erosion with this same runoff and snowmelt water. By ignoring this historical perspective of erosion, the Hydrology Report misleads the reader and draws erroneous conclusions.

Conclusion

I don't deny that cattle can degrade a riparian area, they can, but under very different circumstances. To suggest that cattle grazing on this site causes a measurable amount of cut bank or erosion, while completely ignoring the historical perspective and ignoring the topographical reality, is wholly inappropriate and unacceptable. Furthermore, this site cannot be considered a "Stream Reach", which serves as a foundation for the Hydrology Report.

1. Page 14, First Bullet: It is incorrect to characterize the current grazing system as season long use. We don't just turn the cattle loose and let them spend the summer grazing wherever they might wander, as would be suggested by season long use. We start at the south end of the permit and regularly ride to migrate cattle north and east as the season progresses. There are significant topographical features that serve as natural barriers that aid keeping cattle dispersed. Granted, without fences, this isn't airtight. And where there are fences, we are continually challenged by motorized recreational users leaving gates open.
2. Page 14, Bullet Five: When I was first permitted on Lost Canyon 16 years ago, the USFS joined the Lost Canyon Permit, the Esty Pasture, Silver Springs pastures, and the Elsinore/Wapiti fall grazing permit into one large grazing unit. It is important to understand and acknowledge that the current AUMs on Lost Canyon, and associated additional pastures, were not established by any evaluation of carrying capacity nor by historical grazing of this area. The USFS made me leave Beaver/Antelope Grazing Permit because of cutthroat trout. A trade was made for Lost Canyon Permit. The exact amount of Beaver/Antelope AUMs were transferred to Lost Canyon. USFS has recognized and acknowledged since the beginning that Lost Canyon Permit, with the addition of Silver Springs and Esty Pasture, is significantly under-utilized. But the answer to me is always that analysis needs to be done before changes can be made. It is my understanding that as part of this Environmental Assessment, carrying capacity will be evaluated and implemented. I am surprised and confused how the USFS came up with 200 Cow/calf as the capacity. What is the USFS calculation of percent of grazing utilization currently occurring? I ask that the USFS re-evaluate the carrying capacity to be more realistic. By my estimation we currently are grazing 5% or less of the available forage. USFS suggests 40% forage utilization is appropriate.

With the recent revitalization of the springs and ponds, the availability of water is less of a limiting factor.

Regardless, tying a carrying capacity evaluation to a faulty and bias Hydrology Report is not appropriate and they

should not be linked together.