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Gunnison Ranger District

Attn Dayle Funka

216 N. Colorado Street

Gunnison, Colorado 81230

Dear Dayle,

High Country Conservation Advocates (HCCA) is a grassroots non-profit dedicated to protecting and improving the health, integrity, and beauty of almost two million acres of public lands in Colorado's Gunnison River country.

Thank you for the opportunity to provide comments to the North Valley Cattle and Horse Allotments Environmental Assessment (North Valley Allotments EA). HCCA is aware of the legacy of the many decades of public lands cattle grazing on the allotments within the Gunnison Ranger District and appreciates the Agency working to analyze the impacts prior to any decision to continue to authorize cattle grazing uses.

It's worth noting that 5 of the 6 allotments in this EA have not had any prior NEPA analysis. HCCA would like to encourage the unit to identify where NEPA analysis is insufficient, lacking, or outdated and undertake the required analysis. The NEPA process is a critical safeguard for public lands to scope the community, evaluate impacts, and work out mitigations - we value these outcomes and support the Agency to engage the NEPA process as required by law.

Generally, it seems the objective of the North Valley Allotments EA and the Grazing Management Toolbox is to provide cattle grazing permittees and the Agency "flexibility" to administer public lands cattle grazing on allotments to respond to seasonal weather factors such as snowpack, water and forage availability, drought seasons, etc. These are certainly important metrics to consider, yet on the flip side if there is such wide opportunity to change season dates, change numbers, change livestock class, adjust intensity and duration and start at - early on and not finish until latest off dates - it could result in more use than ever before. If not properly operated, monitored, and administered by both the Agency and the cattle grazing permittee the North Valley Allotments EA would lead to resource damage associated with this use.

The EA describes Range Improvements as "include but are not limited to structures such as fences, corrals, and water systems." This is an overly broad description of items that are authorized for long term occupancy on National Forest lands which are known to have varying impacts on hydrological, wildlife, aesthetics, and public access factors. Please include a more formal inventory that clearly defines whether it is a corral, fence, cattle guard, water system, what type of water system, or other range improvement and analyze the impacts of each feature. All of these improvements intended for cattle grazing management have different impacts associated with them and should not be grouped together for broad analysis.

Additionally, many of these improvements are owned by the permittee and some are owned by the US government. A formal inventory would assign ownership and should include a decommissioning plan for the eventual removal and reclamation of public lands. Many of these range improvements are permanent

constructed features that have been situated on the National Forest for some length of time. We recommend more regular maintenance of these range improvements or a shift to temporary facilities that can be removed from public lands when not in use. It seems that better administration will eliminate some of the need for stewardship projects to remove abandoned range improvements from public lands in the future.

In the Lost Canyon/Silver Springs allotment, where 2 stream reaches are not meeting desired conditions - the North Valley Allotments EA provides a path that allows for increased use if streambank conditions remain static or upward trend toward proper functioning condition (p. 18). It seems that these stream reaches need to be clearly mitigated from impacts and fully recovered before the area is grazed again or increased use is considered.

If the stream reach in degraded condition remains static in the degraded condition it is most likely resulting in resource damage like erosion and downstream turbidity. A static degraded determination could potentially justify increased cattle grazing because the condition, though causing negative impacts, is static. We recommend not grazing areas that contain known degraded stream reaches until those stream reaches have been fully rehabilitated and mitigations are in place to prevent future resource impacts from cattle grazing.

Additionally in the Lost Canyon/Silver Springs allotment the addition of 4.83 miles of barriers or fences is a very long linear feature that would require significant ground disturbance to implement and maintain, as well as serving as a barrier to wildlife, viewshed, and public access factors. A fence of this nature would be another linear visual impact and the road provides operational access to prevent the need for more or new fencing on public land. The North Valley Allotments EA does not provide any management rationale for this new barrier and therefore needs more analysis of the impacts before decision to locate on National Forest land.

In the Butte North allotment, the plan proposes a change in Season of Use from October 6 to 20 in existing permitted activities to Earliest On and Off Dates of June 1 and November 5 which is increase of less than one month to 5 months. The EA discusses that livestock use would be concentrated on private land, but does not provide clear description of how cattle would be concentrated to private land nor does the North Valley Allotments EA analyze the impacts/mitigations of extending the grazing term within the Crested Butte Mountain Resort Permit area where public recreation is encouraged and facilities are provided for large numbers of recreational users.

At the Spring Creek allotment, a new corral, water tank, and pipeline is mentioned - will there be additional NEPA decisions that provide rationale and specific information about this long-term improvement? Prior to formal authorization please provide more details of proposed water system and construction of corrals or attach plans to the EA for review.

We think it is important to highlight that much of the North Valley Allotments EA plan is based on the results of monitoring and the permittee working in earnest within the allowable dates and use goals. All of the goals for ecological stream improvements or increased cattle grazing are based on monitoring data and trends that show improvement from degraded conditions. The monitoring section on Page 12 details general monitoring guidelines but given the reliance on monitoring it would be helpful if the North Valley Allotments EA outline more specific monitoring needs, goals, and associated increases or decreases as a metric, as well as who performs the monitoring and providing annual reports with the monitoring data. Without satisfactory monitoring data and recovered degraded stream reaches - there should be no increases in cattle grazing in these allotments. Given the challenges the USFS is known to have with staffing - it is concerning that the Agency will not have sufficient resources or expertise to monitor all 6 allotments in addition to the other allotments within the jurisdiction of the Gunnison Ranger District.

The North Valley Allotments EA describes the Snodgrass allotment as vacant and that range improvements need to be reconstructed and improved to be restocked with cattle. The National Forest land in this area has changed

significantly over the past 20 years and receives a high level of recreational use, as well as a large concentration of scientific research studies and instruments that have been authorized by USFS to be situated on the southeast aspect of Snodgrass Mountain. Given these factors - it seems this allotment should either be terminated at this time or provide more details on specifics necessary to reconstruct and improving the range improvements as well as analyze cattle grazing impacts on other uses in the area.

Despite not having a prior NEPA analysis performed on the Meridian allotment, this area of National Forest land has also experienced drastic changes in the past 20 years and is now bordered by subdivisions with hundreds of homes and residents seeking access to adjacent National Forest lands in addition to heavy recreation use from adjacent trailheads. Due to the mix of uses in this area and the adjacent private lands -grazing permits in this area need to be tightly administered with a well-defined annual schedule of dates that give other users clear knowledge if cattle are being grazed in the area and whether any private land closures associated with the public land cattle grazing are in effect.

Overall, the cattle grazing in the North Butte, Meridian, and Snodgrass allotments needs to be analyzed and managed commensurate with the high recreational use, research experiments, ski resort permit area, and private property ownership in the area to ensure legal access to public lands, avoid user conflicts, as well as protect health and safety of both cattle and the public.

The grazing authorizations in the Almont Triangle and Lost Canyon/Silver Springs Allotments must assess the impact of livestock grazing on late-brood rearing Gunnison Sage Grouse. The Forest Service should use this analysis to inform seasonal restrictions for grazing, and extend the utilization limits beyond July 16 to account for late-brood rearing impacts in the final authorizations. We disagree with the proposed expansion of the earliest and latest on/off dates within the Almont Triangle Allotment as there is already a high degree of degradation of the vegetative communities within this allotment and there needs to strict attention paid protecting the limited remaining Gunnison Sage Grouse habitat that remains in the Gunnison basin.

Thank you for the opportunity to comment. We look forward to reviewing future NEPA documents associated with this project.

Sincerely,

Jonathan Hare

Advocacy Director

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