Data Submitted (UTC 11): 11/28/2021 11:00:00 AM
First name: Terry
Last name: Fankhauser
Organization: Colorado Cattlemen's Association
Title: Executive Vice President
Comments: Thank you for the opportunity to provide comments on the Draft Environmental Impact Statement ("Draft EIS") for the Grand Mesa, Uncompahgre and Gunnison National Forests ("GMUG"). The below comments are the Colorado Cattlemen's Association (CCA) and Colorado Public Lands Council's (CO PLC) recommendations and concerns with the Draft EIS. The Colorado Cattlemen's Association's mission is to serve as the state's premier cattlemen's association that serves as the principal voice and advocate for Colorado beef production including public lands grazers and CO PLC resides within CCA's organizational structure. The Public Lands Council represents public land grazers throughout the country and has a long history of being involved in regulatory reform involving public lands grazing.
IntroductionWhile CCA and PLC understand through witnessing the dramatic changes taking affect, both man made and environmental, across the GMUG range, we encourage the forest to recognize the consistent and meaningful management that has yielded a more resilient ecosystem throughout the lands. A steady management approach that is informed by observational science and outcome-based management has been the hallmark of healthy and vibrant ecosystems worldwide. To make protracted decisions based on singular objectives will not serve the land, water, air and greater ecosystem in the least. Again, CCA/PLC recognizes the impacts from recreation, prolonged drought and other concentrated variables[hellip]but not at the cost of sustainable uses like livestock grazing.Comments on the 2021 Draft EISWatershed protection: Watershed protection affects all aspects of forest management, intersecting activities from grazing, recreation and ecosystem health and maintenance, to wildlife, vegetative management and harvesting timber, fuels reduction and more. CCA/PLC supports greater management of recreation as indicated by the forest. Furthermore, efforts that work hand-in-hand with livestock permittees to maintain and conserve watershed health is supported by CCA/PLC. Both organizations and their members currently have watershed management programs that are broadly supported and engaged in by livestock producers across the state. Broader partnership approaches with the agency would be welcome.FW-GDL-REC-12 (Draft Revised LMP, page 62): CCA/PLC requests clarification on whether "administrative uses" include those for watershed and water infrastructure development/ maintenance? Please define precisely what" administrative" use allows or prohibits for greater clarity.Forest Plan Objectives, Table 35 Fuels (Draft Revised LMP, Page 180): Given the quantity and intensity of wildfires in the west, CCA/PLC believes that grazing can aid in fuels reduction, thus decreasing the threat of wildfire across all federal lands. Grazing has also been found to contribute to controlling invasive plant species. CCA/PLC appreciates the addition of the verbiage on page 59 of the Draft Revised LMP to "Seek opportunities to apply targeted grazing to support specific hazardous fuels reduction and prescribed fire treatments". We ask that this language also be added to the Fuels Resource for the Forest Plan Objectives, Table 35.FW-GDL-FFM-03 (Draft Revised LMP, Page 25): In regard to fire suppression activities, CCA/PLC supports Delta County's recommends via their comments below through notatation:1. The USFS identify a more robust fuels management maintenance schedule as well as a significantly enhanced collaborative plan with stakeholders involved in wildland fires.2. The USFS identify and target watersheds that are critical to vital water supplies as soon as is practicable, and focus intensive vegetative management treatments to reduce fuel loads so that the vital liquid resource is protected to the maximum degree possible. This would include providing enhanced access to critical watershed areas to allow for firefighting and vegetative management activities identified in Alternative C.3. Utilize more mechanized/motorized removal and thinning to reduce fuel loads. Work actively with stakeholders such as Montrose Forest Products and other stakeholders to achieve these goals.4. Identify timber harvest as a best management practice for managing carbon, based on sequestration in wood products and elevated growth rates after harvest.5. Identify the USFS classified roads that would be utilized for firefighting access in each watershed. Characterize road conditions and develop maintenance schedule so that access to fires is not delayed by poor road conditions. Conduct the required maintenance as scheduled.Fuel Treatment Comments for Watershed Protection and Resilience:1. The current Draft Plan limits timber harvesting to slopes of 40 percent or less. Delta County recommends the Plan recognize and acknowledge that new harvesting technology, such as cable and

tether systems, allow harvesting on slopes up to 60 percent with minimal ground disturbance. With steep topography being one of the major contributors to fire intensity and behavior, this new technology is becoming an increasingly important tool for addressing forest health and reducing the intensity of fire behavior.2. To enhance stand resilience and overall forest health and to provide for more robust fuels management, Delta County recommends increasing the size of clear cuts allowed in lodge pole and aspen stands rather than limiting it 30 acres or less, as currently defined. Delta County recommends an acreage size that is economically feasible and allows for landscape vegetation management.3. Delta County is opposed to an additional category of "climate refugia" that will include additional restrictions and regulation. Existing management plans and designations are adequate. Adding an additional category of land management obligations will further complicate an already full categorical plate of management obligations on the GMUG and will encumber the job of responding to a changing environment.4. Provide for a permitting process that is clear and efficient for all stakeholders. Identified fuels treatment areas should have additional staffing resources engaged to conduct necessary NEPA actions ahead of permitting.End of CCA/PLC supported Delta County commentsSocio-Economic Specific Comments: The collective aspects of human interests and values shape public lands along with federal lands effects on communities and economies near public lands. To continually enhance overall land management in a sustainable fashion, the forest must continually maintain contact and provide value to adjacent and reliant "communities".Travel Management & Access outreach and coordination with the affected interests.Timber: The GMUG is a significant producer of harvested timber within a multi-state region. The workforce, mills and product outlets are established and functional. Timber harvest can and should continue in a planned and sustainable fashion that yield healthy and resilient forests. Such benefits include beetle control and dead timer removal, wildfire management, watershed health, protection of urban interfaces and overall better functioning ecosystems.Hunting: The forest plays a role in management of wildlife populations and objectives. Most of Colorado's critical wildlife habitat exists on private lands, therefore well managed federal lands are important to distribution and seasonal use by wildlife. The forest should work closely in addressing needs and objectives with landowners, permittees and the Colorado Division of Wildlife and Parks.Rangeland, Forage, and Grazing: Overall the rangeland portion and impact analysis in the Plan are consistent with existing range science and resource conditions. Although private ranches are beyond the regulatory purview of the GMUG and USFS in general, it should be recognized that the preservation of these properties as working ranches helps support management objectives of the GMUG and that GMUG grazing management is partly responsible for the continued economic viability of these ranches. Although the Plan is generally consistent with accepted range science, there are specific areas of concern, that have been developed through an inclusive dialogue with the livestock grazing community and are supported by CCA/PLC that include:1. Recreation is given a higher priority than other multiple-use activities and in specific references indicates that livestock grazing may be displaced by recreational activities due to impacts of recreation. The Plan should establish priorities for distinct uses, however, prescribing permit alterations in advance of demonstrated impacts is moving straight to a single solution for a complicated problem, and could be considered pre-decisional in a National Environmental Policy Act ("NEPA") context. Continuing with this same theme, the Plan generally prescribes the cure for declining conditions or resources on the forest as reducing livestock numbers or time on the allotment without considering other alternatives. The GMUG Plan must direct agency staff to first determine, through quantitative data, that livestock are the causal effect of the decline.2. Livestock grazing is briefly mentioned as a tool for vegetation management, however additional emphasis needs to be placed on the role that grazing can play in reducing fuel loads, reducing invasive plants, and general vegetation management. Wildlife is mentioned as inadvertent spreaders of weed seeds, however livestock are listed as a causal factor. Both vectors need to be listed in a similar fashion as the mode of spread from both sources are similar.3. Livestock are listed in the Plan as causing trampling of water sources. While this is accurate, it would be more correct to indicate that both livestock, wildlife, and recreationists may cause impacts to streambanks and water sources. Additionally, livestock grazing is listed in the same level of impact to scenic resources as fire management. This specific reference is not realistic, nor reflective of actual conditions on the ground. Livestock waste is mentioned as dominating grasslands and meadows, this is also not realistic, nor actualized on the vast acreage of the GMUG. Range management is listed as adverse in numerous paragraphs, specifically when scenery is mentioned.4. In the recreation section, it would be important for the USFS to list that in addition to seeing wildlife, recreationists may see livestock on the landscape when utilizing

Wilderness areas. This statement is included for general forest areas but is not mentioned in the Wilderness section.5. Unnecessary fences are mentioned for removal, however there is no guidance to help USFS personnel first determine how fences should be categorized or what constitutes an "unnecessary" fence. Nor does it identify when or how grazing permit holders will have input into the determination of a fence's necessity.6. Specific to carbon sink information, rangelands are not mentioned as sequestration sites. Research clearly shows that rangelands are a significant source of carbon sequestration which needs to be mentioned in the Plan, especially given the length of the implementation of the Plan. Forest lands and other areas are mentioned, however, rangelands need to be included in this list, as well as an estimation of the carbon sequestration they provide. Rangelands are a large repository of soil carbon because of their high carbon density and the vast land resource area they represent. Improved range management strategies have been shown to significantly increase soil carbon storage while concurrently providing other benefits such as improved water infiltration, increased water storage capacity, and greater nutrient reserves. Because productivity of rangelands is inherently low with traditional low-input management systems, suggested strategies for improving production, and concurrently soil carbon sequestration, include:a. using appropriate plant species;b. enhancing water-use efficiency;c. controlling erosion and restoring degraded soil; andd. managing and enhancing soil fertility.These management strategies would support multiple management goals within the Plan, including the carbon sequestration targets. It is important to add to the landscape narrative that the private land ranches surrounding most federal lands are generally tied to the use of federal lands chich creates additional wildlife habitat, carbon sequestration, and open space.7. The broadly-mapped "wildlife corridors" could be used to curtail a wide range of uses, including grazing, on large parts of the landscape. Reducing permit numbers and/or allotment time should not be the direction provided as an initial tool when working to reduce the direct contact between bighorn sheep and domestic sheep. Additionally, the specific language refers to pack goats and domestic sheep as solely responsible for the long-term viability of bighorn sheep which is not accounting for all of the other influences that also are currently impacting the health of the bighorn sheep.Wilderness, Roadless, and Special Management Areas: In short, CCA/PLC does not support any additional special land designations in the forest such as wilderness, roadless or special management areas. CCA/PLC does not believe any of the suggested designations in the draft plan meet characteristics of special designations, in large part due to increasing and concentrated human use. By further restricting management practices due to special designations, the forest will not be allowed to meet degradation caused by human use in a timely and cost-effective fashion[hellip]thus decreasing overall conservation measures. Removing management is not the answer.Air Quality: FW-DC (Preliminary Draft Revised Land Management Plan, Page 11) and FW-GDL-AQ-11 (Preliminary Draft Revised Land Management Plan, Page 11): CCA/PLC concerns that the metrics for measuring air quality in the West Elk Wilderness are not spatially appropriate and indicate localized impacts when statewide air quality sampling metrics have shown air quality impacts come from regional if not global presence of adulterants. Thus, localized determinations and subsequent management will have little if any positive impacts on air quality but in turn will impair economic and management strategies that benefit the area.Water Quality and Water Development: The only framework for watershed and stream management should come from the Clean Water Act either administered by the state of Colorado or appropriate federal agencies. To arbitrarily delineate protective zones with no ability for management in these areas beyond no-use is ill conceived and not responsible to the resource.Our forests must not be the beneficiaries of shrinking budgetary resources as public use and recreation is on a steep incline. Rather, the forest must advocate for resources to manage the impacts from these uses rather than make cuts in areas that have been sustainable, financially and resource-wise. Furthermore, the forest must not reduce allowable uses such as grazing as mitigation for the impacts from enhanced recreation and public use. Neither approach is sustainable or appropriate.In closing, thank you for the opportunity for the Colorado Cattlemen's Association and Colorado Public Lands Council to provide these comments.