



Established 1894

GUNNISON COUNTY STOCKGROWERS ASSOCIATION, INC.

P.O. Box 1711 ♦ Gunnison, Colorado 81230

12/8/17

Dear Forest Plan Revision Team,

Thank you for soliciting input from the community on the long term management plan of our public lands. It has been a well organized effort and our interaction with the team and other Forest staff has been most helpful in understanding the Revision process.

Gunnison County Stockgrowers Association represents 75 ranch families and partners in the Upper Gunnison Basin that for generations have relied upon and stewarded our public lands, while playing a key role in our local and national food systems. In the most recent Census of Agriculture, Gunnison ranches produced nearly \$13M of products, largely made possible by leveraging both private and public lands in a landscape-scale management model. These ranches not only provide economic diversity, they provide a cultural center to the community, protect against unencumbered growth, maintain water in the basin of origin, provide wildlife habitat and corridors, as well as other ecosystem services.

We would first like to applaud the shift in perspective towards adaptive management rather than a prescriptive model. We have seen this in the staff's approach recently and are pleased that it is central to the Forest Plan revision. This approach is already fostering more collaboration and understanding that will be key to managing these landscapes into the future. The dynamism of increased recreational use, climate change, wildlife concerns, and a changing agricultural community will require a broad suite of tools to ensure a continued stable to upward trends in range condition that we are seeing on 97% of Gunnison Basin grazing acres. This will take proactive measures and we look forward to sharing our generational understanding of these working lands so we can adapt most effectively.

An adaptive management model will require better information that is communicated clearly to all stakeholders. In transitioning from range condition ratings to ecological conditions, we would suggest that this is an opportunity for the range specialist and permittee to assure understanding and work together to establish a mutually agreed upon and robust monitoring protocol. This will allow these partners to have clearly communicated resource goals and criteria to manage towards. Long term and consistent monitoring will be of increased importance as we look at trends to assess the effectiveness of our grazing management plans and also offer data driven decision making in times of ecological stress. It will be critical for permittees to have a well understood decision making process in place so they build appropriate resiliency in their businesses. This is key to collaborating on landscape-scale health so that there aren't unexpected management decisions that puts private rangelands at risk of degradation. As we all work on ecosystem wide issues such as Gunnison Sage Grouse, it is critical we have this transparent process in place.

We also encourage the USFS to take a more active role in management conversations with Colorado Parks and Wildlife (CPW), particularly on elk. With development pressures, changing and better understood migration patterns, and more uses on our public lands, this will be an evolving dialog that is location specific. While it is conveniently easy to adjust cattle numbers to address changing elk use, it does not solve underlying drivers, and puts culpability and economic stress on ranchers that are not responsible for these changes. Similarly, while we acknowledge the challenges of disease transmission between domestic and big horn sheep in

the southern part of the district, we urge all parties work towards an innovative solution that addresses health concerns and allows grazing to continue on suitable allotments.

Recreation is an issue that has had significant and ongoing impacts on permittees with open gates, increased traffic on Forest roads and trails, increased difficulty managing grazing permits, trespassing on private lands, and public misunderstanding. We firmly believe in multiple use, however, much like grazing reform was needed to address resource concerns in past decades, recreation management needs to evolve towards an understanding of carrying capacity and implementation of management plans with necessary funding. The pace of change that is seen around Crested Butte, and increasingly valley wide, has exceeded the capacity of other users, infrastructure, and the resource to adapt. Individual permittees have been active in community outreach with good results, but we need more community efforts, such as Gunnison Public Lands Initiative, that establishes a broader context. We encourage the USFS to engage in these community processes so ultimately the resource health is protected and multiple use preserved with solid planning, implementation, and enforcement.

There are concerns expressed by community members about impacts of grazing and the grazing fee for permittees. While much of the range condition and trends in the Gunnison Basin are 'unknown' in the draft assessment, the Gunnison office indicates that the upland and riparian areas are in good to excellent range condition with stable to upward trends, as will be included in the subsequent version of the assessments. This would indicate to us that grazing management issues are isolated and we would encourage USFS to proactively address these areas of concern with permittees, and ultimately ensure grazing standards are enforced.

In addressing public concerns of grazing fees, comparisons to private leases has to account for the differences with running on public land allotments. According to Colorado Cattlemen's Association, the average permittee spends \$28/AUM, which not out of order compared to private native rangelands in the state with values \$11-40/AUM, as surveyed by CSU. The difference between the grazing fee and true cost to permittees is accounted by an extensive management need on lower productivity lands, the maintenance of infrastructure, and collaborative management with other users, all costs not incurred on private grazing leases.

There are several vacant allotments in our district and there has been question about whether to close them. We would encourage, as we enter into this era of adaptive management, that these allotments are kept open to the possibility of future stocking. Issues that have precipitated non-use (recreation pressures, endangered species/habitat concerns, lack of permittee interest) may very well be resolved and these areas could provide management flexibility in the form of grass banks to address drought and other short term challenges that will be important to the basin. As we are looking at the future of the ranching community, there will likely be significant changes how it is organized as we address issues of an aging producer population, diminishing water, and other trends. As land management partners, we will need USFS at the table with collaborative tools to address a changing agricultural context. This includes permit boundaries, timing, and permittee qualifications.

Gunnison Stockgrowers looks forward to continued partnership with the GMUG grazing program as we together steward these working landscapes that are critical to our communities.

Sincerely,

A handwritten signature in black ink that reads "Bruce Allen". The signature is written in a cursive, slightly slanted style.

Bruce Allen
Vice-President
Gunnison County Stockgrowers Association