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Re: Scoping Comments for the GMUG National Forests

The Colorado Wool Growers Association appreciates the opportunity to provide comments on this important management process for the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests.

As the U.S. Forest Service works on the revision of the Land and Resource Management Plan for the GMUG, maintaining multiple-use should be a priority. Recreation is an important component of national forest use; however, it should not be a priority over other uses such as livestock grazing and timber harvest, both of which are land management tools that improve the landscape. Recreation, on the other hand, does not.

As livestock producers, our biggest concern is the U.S. Forest Service's (USFS) departure from its role as a land management agency and supplanting itself in the role state wildlife managers, oftentimes ignoring our state game agency, the Colorado Parks & Wildlife. This is an ongoing problem, as the USFS continues on a path to reduce or eliminate domestic sheep aums because of concerns regarding the proximity of bighorn sheep. The grossly inaccurate Risk of Contact model should be abandoned in favor of an accurate, objective, and comprehensive evaluation process to assess all contributing factors to respiratory disease and herd health of bighorn sheep.

The revision process should have more emphasis on the economic impacts on our rural communities, when the USFS makes decisions that curtail multiple-use of our federal lands.

Riparian areas are always important on any landscape, but they are not a dominant feature on the GMUG, and the management plan should accurately reflect this. The CWGA supports appropriate water storage plans that help provide beneficial use of this limited resource.

While well-intended, managing for air-quality is likely to hand preservationists a hammer to shut down any type of multiple-use on our forests.

Current wilderness and roadless areas already provide a significant number of places for solitude and quiet recreation; further limitations on forest use restrict management flexibility.

Monitoring should be significant component of adaptive management. Without an accurate baseline and trend, it is difficult to determine if management plans are creating the desired outcomes.

Managing the forests for “scenery” is another component that sets the agency up for litigation by preservationists, and is a bad precedent to set.

In closing, we continue to urge the USFS to streamline the agency and corresponding processes to eliminate unnecessary regulatory overburden, reduce administrative costs, and transfer the savings to on-the-ground field work such as monitoring and other activities that will directly improve the quality of our national forests.

Sincerely,

Ernie Etchart

President