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Comments: Attn. : GMUG Forest Plan comments

I wish to comment on the GMUG Forest plan revision #51086. My family has actively managed a forest grazing allotment on the Gunnison National Forest since before the Taylor Grazing Act was implemented. A great deal of pride, sweat, and investment goes into managing these grazing allotments. They not only provide summer grazing for local family ranches, they provide much needed forage and brush management, are a crucial link between maintaining rural productive landscapes which provide much needed winter wildlife habitat and are crucial to supporting the economic base of western Colorado counties. It is extremely important that grazing permittees have the tools needed to continue to improve forage, water, and soil resources. These tools include flexibility in management, cooperation with district range personnel and attainable standards and guidelines. In the past fifteen years, we have seen significant improvement in forage and riparian vigor and health on our allotment and many other allotments we have toured. These improvements have not been due to reduced stocking rates or shortened grazing seasons. They are due to improved knowledge of range and riparian management, flexibility in year to year management, and close cooperation between ranchers and district and regional personnel.

One size fits all, cookie cutter standards and guidelines only inhibit the type of management required to make these improvements. An example of this would be: 4" stubble height on all riparian areas, and a minimum of 50% utilization in critical areas. Management focused solely on this type of criteria does nothing nor measures anything on trend or overall range health. It simply says what particular forage height was in a particular area at a given time. They act as a beneficial guide for managers to be aware of especially in consideration of drought or other impacts, but should not be used as the sole reasoning for major management decisions. A very simple but useful tool is the Grazing Response Index (GRI). It can provide an objective view of year to year forage utilization and can correlate with upward or downward trend. It takes into account many more factors than stubble height or utilization. The GRI should be utilized and analyzed annually on all allotments.

We appreciate the effort that goes into forest planning and appreciate the opportunity to provide comment on the process. We feel that drastic changes to grazing language would be harmful to local ranchers, the economy, and would not lend to improved rangeland health.