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Comments: I am writing to share my observations and concerns on the Draft Assessment Reports, in particular the Range Management Section.

Chapter 5 of the Assessment Report, page 16 of great concern to me. Stubble height and utilization are listed but these indicators are not true trend indicators. For instance, desired utilization could be achieved but resource issues could still exist. The same could be said for the opposite. Utilization and stubble height alone will not tell you if you are on a positive trend or meeting your resource objectives. Utilization and stubble height must be grouped with trend indicators. The Forest Plan for the GMUG should emphasize range management that is flexible, manages for plant recovery and builds on what has worked in several allotments on the GMUG. To move back to rigid stubble height standards not only does not work, but is exactly that, moving backwards. More information regarding the Grazing Response Index is needed and should continue to be implemented, as it is effective to maintaining rangeland health.

Some plant communities even though not desirable are very challenging to change- even with proper management practices. For example, the reduction of smooth brome dominance where it is already established has yet to be done to my knowledge. Smooth brome might not be desirable from some perspectives, and restricting cattle grazing to reduce it is unlikely to be effective. This assessment seems to point to the reduction or elimination of livestock grazing for improved conditions on the range rather than looking for viable options or the best answer.

The socio-economic impact of livestock grazing is woefully under represented for these counties. The economic impact from livestock grazing is clearly a driving force and bring economic growth and stability to these communities. From the 2011 Agriculture Fact Sheet published by the CSU Extension- Delta Extension Office, it reported \$35,966,700 from livestock sales in Delta County alone. A vast majority of the livestock raised in Delta County are grazed on the GMUG during a portion of the year. Montrose County boasts \$59,275,800 in livestock sales- these counties bordering public lands thrive and depend on the economic growth gained from grazing permits.

The drought and climate change all indicate a decrease in range production yet discussing the issue with the permittees and working out a solution or viable route is not listed. Our West Elk Grazing Association has historical information dating back as far as the 1930's and would prove the solution to these problems should these conditions play out. Caring for the range is our priority and assessing the trends and looking at the data in our monitoring files is the starting point.

Thank you for taking my comments into consideration.