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Title: EVP

Comments: On behalf of the Colorado Cattlemen's Association and Colorado Public Lands Council, please

accept the following comments on the GMUG Scoping Document.

Vision and Distinctive Roles and Contributions Section

- * We appreciate the statement in this section that acknowledges the multiple use standard for Forest Service Lands. Our industry has been an advocate for this approach and strongly believes the intent of multiple use planning does not place one use over another nor does it exclude planning considerations such as NEPA, etc unless overarching criteria is place such as Categorical Exclusions.
- * The planning process should consider carefully implications from one use to another. Such as implications to livestock grazing or resource impacts from activities such as recreation, etc. Livestock grazers have long since managed resources, through timing, duration and stocking rates to deliver high quality habitat that supports diverse ecosystems.
- * We support the managed timber harvest on the GMUG in order to manage invasive species of insects and to provide for a balanced and functioning ecosystem.
- * We strongly support the bulleted statement under "Commodity Use and Community Connections" related to livestock grazing and rangeland resources. In many ways, the GMUG's land management approach has been a model for permitted livestock grazing. We support the continuation of this approach and ask that adequate resources be dedicated to the range programs that deliver these services within the GMUG.
- * Ranchers who graze on public lands also serve as stewards for that land. Ranchers' commitment to effective stewardship includes ongoing efforts to preserve clean waterways, control invasive plants and non-native grasses, and protect endangered species. They also maintain feeding areas used by native species and serve as first responders during disasters like forest fires.
- * Ranchers have worked with the USDA to save 4 million acres of sage grouse habitat in 11 states that's twice the size of Yellowstone National Park. On the GMUG alone, ranchers have protected and managed resources to conserve tens of thousands of acres of Gunnison sage grouse habitat.
- * According to the Department of the Interior, grazing on public lands contributes a minimum of \$1.5 billion annually to the economy. Ranchers pay the federal government approximately \$12 million for grazing permit fees. Ranchers pay taxes on the public lands permits they hold. Key Needs for Change Section
- * We support the need for development of a monitoring plan that is meaningful, repeatable and focuses on landscape level changes. A key element of this plan should be the allocation of adequate resources and incentives to achieve the desired level of monitoring. Livestock grazing permittees should be engaged in the monitoring and site-specific capabilities and analysis should be implemented.
- * We support the need to consider recreational implications in Forest Plan conditions are developed. Recreation must be managed, as other uses are, as they impact the functionality and health of the ecosystem. A key element of management is monitoring recreational impacts.
- * The GMUG must be a good neighbor to adjacent landowners. Where impacts drift onto private and state grounds, the Forest Service has a responsibility to address and remediate these impacts.
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- * GMUG Wilderness Areas and Wilderness Study areas must continue to be managed in context of historic uses...such as grazing, improvement construction and maintenance, mechanized vehicle use, etc.
- * In describing desired plant communities, indication needs to be made on a site-specific scale with strong consideration for site potential. For example, determinations of stubble height, composition, etc may not be standardized due to differing soil, moisture, etc. conditions.

- * We support the Scoping Document's statement of minimizing wildlife/livestock conflicts in coordination with permittees.
- * We support the approach of proactively addressing conflicts between public recreation/access and private lands.
- * We suggest that the plan be updated to reflect the delisting of the Lynx and subsequent management of the species to return to state oversight and not requiring stringent management for the species on federal lands.

Management Area Framework

- * We support the consistent approach across the forest at a planning level. Implementation should be granted some degree of flexibility so long as there is strict adherence to plan direction.
- * We support removing Wilderness Study Areas form the GMUG's inventory. These areas were never intended to be maintained in limbo and managed as if they were wilderness.