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Comments: 1. All drafts have the same, unacceptably large allocation of forest to livestock grazing.

Cattle grazing has very significant impacts on all aspects of national forest management. Alternatives to the present "maximum use and maximum cost" policy should be presented. Approximately 80 percent of the Draft Plan area are managed for livestock grazing. (DEIS, Vol. 1) DEIS Table 141 shows rangeland vegetation conditions for GMUG in 2016: 29% Fair or Poor, only 4% Excellent. Clearly livestock grazing is having a serious, negative impact on rangeland vegetation. The DEIS summarizes, "Managing rangeland conditions for healthy and productive wildlife communities... will continue to be a challenge." While the great majority of public stakeholders call for improving the quality of our wilderness and natural areas, the Forest Service has a policy of maintaining present livestock grazing by reducing "big game population levels [to be] compatible with existing uses and consistent with forage resource requirements." (DEIS, Vol. 1) This indicates uncritical bias toward grazing which is very inappropriate for the present time.

2. Pristine Wilderness and Primitive Wilderness Areas should be managed free of livestock grazing.

"Pristine" clearly implies we should not be pasturing large, foreign animal species in these unique and valuable areas. According to Draft Plan Table 10: "Management emphasis is for the protection and perpetuation of essentially pristine bio-physical conditions and a very high degree of solitude with no perceptible evidence of human use." Table 11 defines "Primitive" as "no facilities, leave no trace". Livestock grazing clearly does not meet these objectives. With increasing demand by the public for access to unspoiled places, the Forest Service should welcome the opportunity to remove the large, unnatural impact of livestock grazing from these most special places.

3. The words "livestock grazing" should be added explicitly in management objectives around At-Risk Plant species.

For example, FW-OBJ-SPEC-28: Within 3 years of plan approval, identify locations where illegal offroute motorized travel, or livestock grazing are is a risk factors for at-risk plant occurrences... Such actions include construction of adequate turn-around and pull-off areas, as well as fencing and/or physical barriers, and reducing livestock grazing area where necessary." (Draft Plan) In FW-OBJ-SPEC-28, 29 and 30, offroute motorized travel and wildlife are specified as stressors of plant species, but as is clearly stated in the DEIS, cattle grazing is as a large stressor on threatened plant species.

The impact of grazing on sensitive plant species is well established in the DEIS. Table 51 of the DEIS lists eight plant species having "Ecological conditions necessary to maintain a viable population" which include "freedom from damage by cattle grazing". The DEIS states, "Second only to ponderosa pine, pinyon-juniper ecosystems have a significant portion (42 percent) of their area rated as "fair" rangeland condition." It seems clear livestock grazing should be removed from these impacted areas.

The Draft Plan itself does not include management objectives which would reduce the impacts of livestock grazing on the sensitive species listed in the DEIS or on impacted pinyon-juniper ecosystems. Instead, the document claims ignorance on the subject. For six species listed in Table 51 of the Draft Plan is listed this or similar statements: "At present there is no evidence that these threats do not operate in the GMUG". If the forest service is to challenge its own DEIS, at least it should propose to study the impacts of grazing on the six sensitive species and pinyon-juniper ecosystems.

4. Cattle and human trailing are incompatible.

Draft EIS Vol. 1 discusses impacts of livestock grazing on the general environment and on the visitor experience. "Livestock urine and manure have some localized impact on air quality and global warming... Livestock can also be a source of fugitive dust." There is no mention of impact of cattle waste on visitor experience. Being myself a frequent hiker in the mountains, I know you are aware this impact is very large where cattle occupy hiking trails. Besides having to continually dodge and smell cow manure on some trails, I have on several occasions had to "stand off" cattle blocking my trail. The DEIS states that "under all alternatives" potential conflicts between visitors, livestock, and grazing permittees are expected to increase. These large animals represent a significant danger to national park visitors.

The DEIS attempts to justify the presence of cattle with the statement, "For many residents and some visitors, the presence of [livestock grazing] contributes to the sense of place or cultural identity, while for others this activity is not viewed as positively." (DEIS, Vol. 1) However the DEIS cites no formal survey to find how many visitors would prefer removal of the unnatural features around livestock grazing. I know I would. "Some visitors" indicates the authors are aware that a majority of visitors to our natural areas do not appreciate the intrusion of corrals and watering tanks in the landscape.

5. Statements indicating economic benefit to the local economy of subsidizing livestock grazing are misleading and unbalanced.

Discussion of the economic cost to society of livestock grazing on the GMUG should be included in the Plan.

226 ranchers are subsidized through the GMUG. (Range Management on the GMUG National Forest) Multiplying this by the average family size in Colorado gives an estimated 579 ranch family members. (Population Totals for Colorado Counties; Quick Facts) This is a nearly insignificant proportion of the population of GMUG, 0.175%. As of 2002, seven GMUC counties had eliminated grazing on their national forest lands. (Livestock Grazing On The National Forests) I find only one news report related to the closures, and that closure (El Paso Country) did eventually succeed. The societal crises USFS suspects will result from ceasing grazing permits clearly does not occur.

With 3,133,000 annual visitors, the Rocky Mountain national forests are the most heavily visited in the country. According to the most recent USFS National Visitor Use Monitoring Survey, in FY2019 recreating visitors spent over \$10 billion in areas around National Forest System lands (Table 15). This economic contribution to local economies must dwarf that of the few ranchers benefiting by permitted grazing on national forests.

There is no mention in either the Draft Plan or DEIS of the economic benefit to society of removing grazing from wilderness and recreational areas. The savings in taxpayer dollars would be very significant, as ranchers are subsidized over 95 cents on the dollar. (Costs and Consequences) That subsidy includes much loss of Forest Service resource as funding and personnel are devoted to managing the permitting and mitigating of impacts of livestock grazing.

6. Mountain bike recreation should be treated separately from hiking.

I know from personal experience that bikers can present a significant danger to hikers, especially on busy or narrow trails. In FW-DC-TRLS-01, provisions should be specified to separate the two activities where there is significant potential danger of collisions.

7. I do not support Alternatives B and C as they reduce primitive and Semi-primitive non-motorized acreage of summer recreation opportunity.

8. The time before required restocking of harvested timber land specified in FW-STND-TMBR-02, 5 years after final harvest, is too long. A lot of erosion can occur in 5 years!

Bibliography (all web documents accessed November, 2021):

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