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Title: Membership Chairman

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On behalf of Holy Cross Cattlemen's Assoc. and individual members (HCCA has approx: 130 ranching members in Garfield, Pitkin, Eagle and parts of Mesa County, with the largest percentage of members in Garfield County). We would like to have answers to the following: What will be the impacts on permittees and their grazing allotments? When will we know which permittees could be impacted and how that will be handled, i.e. will the permittee be provided/offered the use of another allotment? If so will the allotment need extra work to get the water, fences and any other improvements in order? i.e. Will any temporary allotments be comparable to what their permit was if they have to temporarily move?

I did inquire to the USFS representative that HCCA received the email notice from and he and a colleague provided these answers:

"The respective livestock operators who have permits within the project area have individually been sent scoping letters informing them of the project and the opportunity to comment. The allotments in the project area include: Big Mountain/Flag Creek S&G, West Miller S&G, East Miller C&H, and Middle Mountain C&H."

To the question of who the individual permittees are that will be impacted this was the response: "The Notice of Proposed Action (NOPA) does not yet identify individual treatment sites, so I cannot provide specific details on how a given livestock operation may be impacted. Our proposed action has design criteria (Appendices A & B of the NOPA) that state we will coordinate with Forest Service Range Staff and livestock operators prior to implementation of a given treatment to determine if and how said treatment may impact their operation, and how we can work cooperatively with operators to minimize potential impacts. The proposed action does not propose any changes to livestock permits, including changes to AUMs, nor assign additional responsibilities to operators that are not otherwise voluntary or within the scope of their annual operating plan. Additionally, repairs to any damaged range infrastructure caused by the implementation of the project would be the responsibility of the Forest Service or its designated contractors."

My question is when will the individual permittees be notified? The sooner the better so that the permittee can know what to expect for the grazing season or seasons that will be impacted. I am concerned with the wording above--"the proposed action does not propose any changes to livestock permits". Does this mean that alternative forage or temporary allotments outside the habitat improvement areas will not be offered to the permittee? And therefore the permittee won't have the forage they have had until the habitat project area is once again available for grazing? The forage available will definitely be impacted and the number of years for cattle to return to a specific area is most likely around two years at a minimum. Members of Holy Cross Cattlemen's individually have conducted habitat improvements on private rangeland, forest lands -- mitigation of sagebrush, four wing saltbush, etc... and seeding of native forage, and it takes two years for the range to be suitable to put livestock on for grazing again. There is also the concern of weeds and requires extra weed mitigation and management than undisturbed habitat.

So, our biggest concern is that permittees have available equal forage and improvements including water to where they have been grazing in an alternative/temporary allotment until said time that permittees can return to the allotment within the project area. That seeding and weed mitigation for any weed influx from the disturbed range will indeed be the responsibility of the Forest Service or contractors. The weed issue is not a just one time treatment and done when habitat is disturbed and there are concerns that the USFS and contractors continue to

help monitor and control the weeds until such a time it is agreed that the effects of the disturbance due to the project has subsided.

Also, we ask that the number of permittees and acreage of allotments remain the same or increase after the habitat improvements; that there be no decreases in the number of permittees or acreage of allotments without cause for such on the permittees part. i.e. if the permittees are following the annual operating plan that the permittees allotments remain the same or increase.

Sincerely,
Ginny Harrington
Holy Cross Cattlemen's Assoc.
Membership Chairman