

April 1, 2016

District Ranger:

In looking over the Draft Environmental Impact Statement for the Weminuche Landscape Grazing Analysis, I would like to make the following comments:

The new Alternative 4 – Proposed Action – Adaptive management –vacant allotments with restocking requirements is not as positive for the high alpine ecosystem as closing the vacant allotments would have been in the previous EA done for this same area. It will require the FS to perform another costly analysis that takes away from the actual ground monitoring and permit administration which is currently not done as required. The FS is not being realistic on what it can manage and monitor into the future. The action item of the previous EA which stated that “sheep grazing on the active sheep allotments would be eliminated when and if the current permittee and their family relinquish the permit and it would not be transferable to another entity”, has been taken out of this document. That should be included in this EIS in the preferred alternative as a responsible resource action for the vegetation, soil, wildlife and the expected Wilderness experience. Do take the opportunity to close allotments when they have been vacant for years and when the current permittee no longer has a grazing permit

I do not support adding 1,544 acres of alpine tundra, which is sensitive to grazing and has a short growing season, from the Needles Mountain allotment to the Tank Creek and Virginia Gulch allotments. This is not the best use of the land and is an underhanded way of allowing the permittee to continue to graze in areas determined not suitable. This is not a “logical” boundary adjustment – the top of Mountain View Crest is the logical boundary and where the boundary should remain. The Needles Mountain allotment was analyzed and closed in 2009 to grazing and should not be opened and the current trespass grazing should be stopped. Within the 1,544 acres there are high alpine lakes at 12,000 feet (the Gems), erosive soils, continued trailing and loss of vegetation from past and current trespass grazing. These reasons along with degrading the wilderness experience may be why it was closed in 2009.

Alternative 4 includes Cattle grazing in allotments where grazing has not previously or does not currently occur. How in the world could you meet the desired conditions of riparian or noxious weeds with cattle allowed in these areas?

Allowing cattle in Burnt Timber along with sheep and recreational use is a disaster the agency should avoid. The fencing (2.9 miles) would be an additional work load to the District and the required monitoring of the cattle would not happen. As a result, the health of the area would suffer in a variety of ways (weeds, soil erosion, loss of vegetation, trampling). Not to mention the degradation to the esthetics of this remote country with fencing and pasture improvements. Allowing cattle in Tank Creek and having to construct 6.5 miles of fence west of Lime Mesa Trail would impede the movement of wildlife and continue to degrade an area already heavily impacted by sheep.

The only place cattle should be allowed is in the Canyon Creek allotment where they currently are permitted and this should be monitored for riparian issues along Canyon Creek and other drainages within the allotment.

There should not be any cattle grazing in the Cave Basin allotment, part of Alternative 3. Designating the southern part as a forage reserve for cattle grazing to make the existing illegal grazing legal is certainly not appropriate management. The existing trail has major wet issues and much of this area has wet springs that should not be grazed. There is some wording in this document that a range rider would need to be there to keep the cattle appropriately distributed. I question this actually happening. The permittee has thousands of acres outside the Wilderness boundary in the adjacent area where cattle can be managed appropriately. The permittee just wants easy ground and more grass without doing what is necessary to keep the cattle within the current boundaries of his allotment on Middle Mountain.

In the action items in the Design Criteria, the herder's camps in all three alternatives, 2, 3, and 4, should comply with the Wilderness regulations and LNT principles, i.e. no camping within 100 feet of water. These existing regulations need to be attached to the permit.

There needs to be fewer bands of sheep trailed into and out of the Wilderness via Burnt Timber trail, which is used repeatedly every year. It is braided, eroded and has noxious weeds along it, especially where the sheep bed.

Throughout the allotments I have major concerns with noxious weeds and the spread of these weeds with grazing. Wilderness may be your last ecosystem of native species and therefore should be protected.

In the Design Criteria it states that the permittees will be responsible for monitoring their sheep or cattle for numbers, pasture rotations, etc. Why would you let industry monitor itself? Also in the document it says that the agency personnel “may” conduct annual permit monitoring. This “may” needs to be “will” or none of the permit requirements, desired conditions of adaptive management will occur. The wording of Adaptive Management sounds good but who will be on the ground to know the conditions and be able to adapt to the situations in a timely manner to correct or improve the resource?

Please remember that 85% of this study area is designated Wilderness, to be maintained in its native array, where the expectations for the management and care of the land is to a higher standard than other areas of the Forest. Stated in this document is that tourism is the number one economic driver of La Plata County, not agriculture. The general public values recreation and the wilderness experience more than the grazing of their public land, especially in pristine wilderness.

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