COLORADO CATTLEMEN'S ASSOCIATION

"Representing the interests of Colorado's beef industry since 1867"

COLORADO PLC

April 3, 2016

Matt Janowiak, District Ranger
U.S. Forest Service – Columbine Ranger District
PO Box 439
Bayfield CO 81122

Via email – comments-rocy-mountain-san-juan-columbine@fs.fed.us

RE: Draft Environmental Impact Statement Weminuche Landscape Grazing Analysis

Dear Mr. Janowiak:

The Colorado Cattlemen's Association (CCA) and Colorado Public Lands Council (PLC) supports Alternative 4 with the inclusion of forage reserves and increased flexibility for restocking and expansion when supported by adequate forage and vegetative conditions. CCA and PLC appreciates the process and careful consideration of the science and management applications in developing the Draft Environmental Impact Statement (DEIS).

The CCA is the nation's oldest cattlemen's association, represents Colorado's more than 14,000 beef producers and has over 40 affiliates. CCA's membership consists of many BLM permittees and CCA has been a leader and strong advocate for public lands grazing. The PLC represents livestock ranchers who use public lands, preserving the natural resources and unique heritage of the West. PLC's membership consists of cattle and sheep producers throughout Colorado who graze public lands.

CCA and PLC do have concerns that the DEIS ultimately will impede sustainable livestock grazing, specifically for sheep, due to the presence of Bighorn Sheep. Rather, CCA and PLC support the perspectives of Colorado Parks and Wildlife CPW in managing Bighorn Sheep by minimizing direct contact through alternative management strategies beyond removal of domestic sheep. Again, CCA and PLC do not support the "zero risk" approach that is conveyed in the DEIS through an absolute contact free approach.

We appreciate that Alternative 4 maintains the seven vacant allotments to remain vacant rather than close these allotments (previously the preferred option in the 2012 EA). However, concern exists with the complexity to implementing the use of these allotments when needed. A streamlined, yet well thought, out approach to utilization of these allotments needs to be implemented.

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CCA and PLC would like to confirm that fact that managed livestock grazing programs have the potential to maintain habitat diversity and quality for species. For example, research shows that grazed lands produce forb growth and are preferred to non-grazed lands by greater sage-grouse (Evans 1986). Additionally, research shows that nesting cover (under-canopy vegetation) remains adequate with up to 40 percent utilization levels and is not substantially diminished until later in the grazing season, thus indicating that a variety of grazing regimes may be implemented without adversely affecting nesting (France et al.) In areas of high production, utilization in excess of 40 percent will still result in adequate nesting cover. Grazing systems should be implemented and managed to comply with the respective resource area management. Site-localized, long-term trend monitoring should be the basis for determining compliance with management plans. Utilization percentages or stubble-height measurements, set forth in a formula and applicable west-wide throughout the GUSG, are not effective tools for adaptive management. Adequate residual plant cover must be determined by short-term and long-term monitoring, which includes accounting for various environmental conditions.

The DEIS recognizes the need for adaptive management of which CCA and PLC supports. There are inherent disadvantages of inflexible, "one-size-fits-all" standards. An adaptive, case-by-case approach will ensure that efforts and resources are well spent. Ecosystems vary; site potential, plant communities, environmental influences, precipitation patterns and plant production and vigor are highly variable and cannot be appropriately managed by single-source standards and guidelines. The regulations should give flexibility to land managers.

Livestock grazing is compatible and beneficial to resource sustainability. This has been proven by independent, peer-reviewed, scientific analysis. Ranchers are the stewards of natural resources on both the private and public range lands. Allowing ranchers the continued use of public lands without unnecessary restrictions encourages this stewardship and prevents fragmentation through development. As seen in many areas of successful rangeland conservation, livestock grazing and habitat conservation go hand in hand. It is imperative that a stable economic environment be sustained and enhanced so that our members may assist in the conservation of rangeland.

In closing, The Colorado Cattlemen's Association and Colorado Public Lands Council supports Alternative 4 with the inclusion of forage reserves and increased flexibility for restocking and expansion when supported by adequate forage and vegetative conditions. Thank you for your consideration.

Sincerely,

Robert N. Patterson

Tim Canterbury

Bob Patterson
President

Tim Canterbury
Chair