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**To:** FS-comments-rocky-mountain-san-juan-columbine  
**Subject:** Weminuche Landscape DEIS comment  
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Dear Sir,

Thank you for the opportunity to submit a comment concerning the draft Environmental Impact Statement (DEIS) for the Weminuche Landscape Grazing Analysis. In this crazy busy world we live today I appreciate the 45-day comment period. I appreciate the public meeting conducted on March 12, 2016. Conducting a meeting on a Saturday provides the absolute best opportunity for people to attend. The meeting provides an excellent opportunity for the public to meet one-on-one with agency staff. Only in a meeting do you feel the dedication from agency staff and interested citizens to devise a plan that will serve the Weminuche Landscape and the American people very well for the years to come. Thank you again.

The initial draft Environmental Assessment (EA) presented in 2012 is like night and day to today's DEIS. The DEIS provides a more thorough accurate review of socio-economics surrounding this landscape; so much so I consider it a valuable resource worthy a place on the library shelf.

It's my view the preferred Alternative 4 strikes a reasonable balance between the value to minimize the disease transmission risk for bighorn sheep and the value to uphold livestock grazing for today and future generations. Alternative 3 implies that today's generation gets to tie the hands of future generations to raise food by closing the vacant allotments. We are the American people with tremendous resources and ingenuity that will make tomorrow very different from what we know today. I think the preferred Alternative 4 supports the optimism needed to keep pushing forward what should be everyone's goal; to leave the Weminuche Wilderness a better place than how we found it.

In Alternative 4 the stocking requirements for reinstating grazing privileges in vacant allotments adds up to be a significant cost-prohibitive obstacle. Is it really necessary to do further NEPA analyses? Isn't compliance with Forest Plan standards already being met in this analysis? Pre-stocking aerial surveys are expensive. This is a job for young apprentice wildlife students to do on foot for a lot less money. I propose there be wording included that modifies or removes some or all requirements when a vaccine is developed that reduces/eliminates disease transmission risk between domestic and big horn sheep.

Forage reserves are viewed positively in Alternative 3 to be an important tool that provides flexibility for short term decision making that is part of the adaptive management strategy for grazing on the Weminuche landscape. This adaptive management tool should be in the toolbox for Alternative 4. How can it be a good idea for one and not the other?

We can all agree that weather is the greatest factor commanding the show. Short-term flexibility addresses weather factors best. Forage reserves is a commanding tool to address extreme conditions. I have been recording temperature/precipitation information for the National Weather Service since the mid-1990's. I am a rancher. I plow snow for people in the winter. Our region has

been dancing with drought conditions on and off since the early 1990's that qualifies our circumstance to be long-term event. Our weather patterns are off; some of it good (longer growing season), some bad (weaker winter snowpack). Uncertainty remains high. We need all the tools. I am not a fan of forage reserves for allotments when there is significant infrastructure needing regular maintenance. Considerable infrastructure is not likely present in these wilderness allotments that are proposed to be forage reserves for domestic sheep and cattle in Alternative 3.. Please consider adding forage reserve tools to Alternative 4.

In reference to Table 2-2 Rationale for Allotment Boundary Adjustments and Status Recommendations, pages 47-48, it caught my eye that for most of the vacant allotments the rationale includes *little suitable forage*. Really? How can this be true given actual use the last five years is 3,550 livestock animals. This is a drop in the bucket compared to the historical highs for sheep grazing in these allotments in the 1920's. In support for Fall Creek, Johnson Creek and Leviathan to be forage reserves for sheep, the rationale *little suitable forage* is contradictory and unsubstantiated.

Other viewpoints I have for the rationale in Table 2-2 include:

Pine River allotment - While it is absolutely and truly a *high recreation usage corridor* and should likely be no one's intention to insist on grazing livestock there; it is not correct to say there is *minimal access to allotment* for grazing. I say this allotment provides the best access for grazing in the Weminuche Wilderness. It is important to be very clear about the give and take that occurs during plan revisions.

Flint Creek allotment - While I totally agree it provides minimal access to the allotment for grazing, the same should be said for recreation. *High recreation corridor* is not substantiated. In 2015 I could not find anyone (including the local horse outfitter) who knew the trail conditions in Flint Creek. Just below Flint Fork on a 20-minute stretch of the Pine River Trail, the horse outfitter that provides support for hunters asks his clients to walk instead of ride horses through this very rough dangerous section. I witness this. I had a horse rolled over me here in 1981. It remains a dangerous place 13 miles from the Pine River Trailhead. It is sad our premier Pine River Trail into the Weminuche Wilderness is this bad for horses just below Flint Creek. I can't imagine the side canyon Flint Creek is any better maintained. It's likely trails in this vacant allotment have disappeared with the grazing permittees who had an interest to maintain trails.

The boundary adjustments, design criteria, monitoring requirements and sites chosen are all reasonable to support the preferred Alternative 4.

However, there is a recommendation following the Noxious Plants/Invasive Species design criteria on page 59 that I question. I have not seen this recommendation made in any other San Juan National Forest planning documents including travel management proposals. The recommendation states that *any equipment used in the transport of livestock, including horse trailers and stock trucks should be washed before coming onto the allotment if they have been used in areas where noxious plants were present*. While the first two recommendations have been duly noted for many years by livestock owners for weed concerns, this recommendation is new. What does it achieve? Are other

forest users/visitors traveling in cars, trucks, trailers, campers, and off-road vehicles on roads and trails being asked to do the same? Considering all the private landowners that surround the San Juan National Forest, it's agricultural producers who appreciate the value for maintaining a weed-free environment on their lands. They are targeted first?

Instead target local residence who travel up forest service roads to dump their yard waste/weedy plants onto public lands. Let's target ORV's and bicycles who travel on back country trails because I assume the concern must be weed seed falling out of the tread of tires. Here is an observation I have been able to make that will make you sick. I have witnessed high-wind dust-blowing events that have occurred in Southwest Colorado to carry seed that brings in a new crop of annual weeds. The wind-swept appearance of new weeds growing in the lower pockets on barren dryland is telling. This recommendation that targets a few grazing permittees is a lame attempt to address a massive regional concern that should have the attention of all people to do their part.

In closing, I say the San Juan National Forest has done the Weminuche Wilderness proud! Hopefully everyone agrees. Good luck and thank you.

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