

The impacts of climate change pollution by activities on the GMUG should be an overriding concern in all the assessments. The Carbon draft assessment clearly shows how the health of the Forest is critical in mitigating climate change and how mitigating climate change is critical to the health of the Forest. “Forests play an important role to regulate global climate [because they] generally act as carbon sinks...National Forests comprise 22 percent of the total forested land in the United States and 24 percent of the total carbon stored... The GMUG contains the most sequestered carbon of any National Forest...” Insects, disease, and fire, all exacerbated by climate change, are the major impacts to the GMUG’s capacity to sequester carbon. We have a real threat of a vicious downward cycle in which the impacts from climate change diminish the ability of Forests to perform their role in mitigating climate change. **The “Potential Needs for Change” section of each assessment should address the impacts of climate change pollution by activities on the GMUG.**

The assessments need to include Climate pollution information from fossil fuel development. The 2012 Planning Rule, which is the basis of the Forest Plan Revision process, requires the GMUG “to consider conditions beyond the plan area and how they might influence resources within the plan area as well as how actions on the NFS might affect resources and communities outside of the plan area” (pg. 27, item 6). The environmental, social and economic costs of climate pollution to resources and communities both within and outside the GMUG, due to fossil fuel development in the GMUG, should be included in the assessments. Lowering these costs should be included as potential need for change in each of the assessments.

The assessments should consider Forest-wide standards with stipulations for coal leasing that limit uncontrolled methane venting from coal mines. The GMUG is required to consider the question, “Is the Unit integrating carbon stewardship with the management of other benefits being provided by the Unit?” (The Forest Service Climate Change Performance Scorecard, 2011, Element 9). According to an article from the Gunnison Country Times (July 13, 2017, *Methane capture a condition of support*), “By some estimates, methane vented from coal mining activity in the North Fork region is the single largest source of methane pollution in Colorado. Depending on the time frame considered, methane is between 20 and 100 times more potent as a greenhouse gas than carbon dioxide” (pg. A6). Forest-wide standards for limiting methane venting from coal mines should be included in Chapter 5, Potential Need for Plan Changes in the Renewable and Nonrenewable Energy Resources, Mineral Resources, and Geologic Hazards Assessment.

The Recreation assessment should consider the impacts of climate change pollution by recreation activities. The assessment should consider discouraging motorized recreation on the GMUG as a potential need for change due to the additional CO₂ emissions and corresponding negative climate impacts related to excessive motorized recreation.