



December 24, 2017

Attn: Forest Plan Revision Team  
Grand Mesa, Uncompahgre and Gunnison National Forests  
2250 South Main St  
Delta, Colorado 81416

**Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG) - Forest Plan Revision, DRAFT  
Assessment Reports – ADDITIONAL COMMENTS**

Dear Forest Plan Revision Team:

Please accept these ADDITIONAL comments regarding the **Grand Mesa, Uncompahgre and Gunnison National Forests - Forest Plan Revision, DRAFT Assessment Reports** on behalf of the Trails Preservation Alliance ("TPA"), the Colorado Off-Highway Vehicle Coalition ("COHVCO") and the Colorado Snowmobile Association ("CSA"). The TPA, COHVCO and CSA are referred to collectively in this correspondence as "The Organizations".

These ADDITIONAL Comments are provided per your request sent via email on December 11, 2017 regarding the Air Quality and Species Assessments including the draft Terrestrial and Aquatic Ecosystems Assessments for the Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG) - Forest Plan Revision. All of our comments previously submitted remain in effect.

**Additional Comments Relating to Climate Change**

The Organizations are compelled to once again comment on the statements made in the Assessment Reports regarding Climate Change. The preponderance of statements made in the Assessment Reports focus predominately on projected NEGATIVE affects of Climate Change and almost completely fails to recognize any potential positive affects that could also occur if indeed the climate is modified over time. There has been little actual research quantifying how outdoor; especially forest based recreation will be affected by climate change and how to mitigate for climate alterations in a meaningful and productive

manner. There is little scientific research, and far more opinion, on how climate change should be regarded, planned for and implemented. Some benefits may actually be realized through climate change such as an increased number of recreation days per year, longer growing seasons, inspired plant growth, increased vegetation diversity, increased deciduous tree production, shifts in precipitation, added flooding which can raise soil nutrients, just to name a few. As you can see, there can be both negative and positive interpretations due to a changing climate, depending upon the conclusion one may be trying to achieve or defend. The analysis of the cumulative effects of climate change and how to properly address effects (if indeed there are any) remains a fledgling science at best, and subject to individual opinions. As a change in climate occurs (as it has in the past) there are no doubt that the forest ecosystems will adapt/change and our socioeconomic habits and factors will also change and adapt. To restrict or limit accessibility and the recreational use of the GMUG would be impulsive, unjustified, reckless and difficult to enforce. The sheer growth of our population, extremely poor forest health, uncertainty about incomes and spending, changes in future building materials, and the demand for forest products (domestic and imported) just to name a few will likely have far more impacts on the forest compared to the affects of climate change. To be fair, objective and unbiased the staff must devote a similar amount of effort, analysis and written documentation regarding the potential for positive affects of a changing climate and not just a list of perceived negative affects. The preponderance of statements made in the Assessment Reports focusing on the negative affects of climate modifications has the appearance of being pre-decisional and succumbing to a foregone conclusion that all possible and potential affects of climate change will only be negative. We challenge you to be fair and balanced in your assessments, statements and documentations.

On a similar point, on pg. 23 of the Aquatic Ecosystems Assessment report, only the negative affects of roads in floodplains appear to be listed and highlighted. There can indeed be positive aspects of roads and these should share similar mention. First and foremost, roads are absolutely necessary and essential for access to manage, monitor and maintain the Forest in order to achieve the USFS/GMUG's mission: *"To sustain the health, diversity, and productivity of the Nation's forests and grasslands to meet the needs of present and future generations"*. Just to acknowledge a few of the potentially positive affects of roads, we can offer that roads often act as flood regulators and can help to attenuate flood flows and peak discharges, in many cases the presence of roads will decrease flood flow velocities and reduce erosion, roads can compartmentalize flood affects, roads can act as dikes to temporarily impound water to recharge ground water and provide localized water storage for plants and wildlife. These points are listed to demonstrate that there are also positive affects and influences and not just negative affects. However your draft Assessment Reports repeatedly chooses to simply list and highlight negative affects. Focusing solely on one set of affects, outcomes and consequences once again puts at risk your reputation as being fair, open-minded in your assessments.

**The primary threat to be addressed on the GMUG National Forest over the life of the next forest plan revision has to be the poor forest health overall and the large number of dead trees.**

Developing an accurate identification of the challenges that will be facing the GMUG managers over the life of the upcoming revision of the GMUG Forest Plan must be the major goal of any scoping efforts. Planners must avoid the artificial elevation of issues simply as a result of political pressures or concerns that are not based on issues seen on the GMUG. The Organizations vigorously submit that theoretical concerns, such as a groups desire to bring balance and diverse recognition of landscapes into the National Wilderness

System are political issues that have been artificially elevated by that Group and simply are not realistic goals in the current funding environment and with the major challenges facing land managers on the GMUG. The Organizations are deeply concerned regarding the poor forest health in the GMUG as a healthy forest translates into a quality recreational experience for ALL USERS. While any short-term recovery of the GMUG planning area to a healthy forest status is probably not realistic, major steps can be taken to remediate impacts and return a healthy forest to the public in subsequent generations.

*At the landscape level, the GMUG NF has the dubious distinction of being the 5rd hardest hit forest in Region 2 in terms of overall forest health, and as poor as current forest health is, USFS estimates project that Forest Health is expected to get significantly worse before getting better. USFS estimates project a total mortality rate of more than 30% for forests on the GMUG.<sup>1</sup>*

The Colorado State Forest Service recently issued their annual Forest Health report for the state and the conclusions of these impacts are staggering, especially on water quality.<sup>2</sup> The Highlights of the 2016 report are as follows:

- 8% of ALL trees in the state are dead and the rate of mortality is increasing;<sup>3</sup>
- The total number of dead trees has increased 30% in the last 8 years;<sup>4</sup>
- Research has shown that in mid-elevation forests on Colorado's Front Range, **hillslope sediment production rates after recent, high-severity wildfire can be up to 200 times greater than for areas burned at moderate to low severity.**<sup>5</sup>
- A 2011 study involved monthly monitoring of stream chemistry and sediment in South Platte River tributaries before and after fire, and showed that **basins that burned at high severity on more than 45 percent of their area had streams containing four times the amount of suspended sediments as basins burned less severely. This effect also remained for at least five years post-fire.**<sup>6</sup>
- High-severity wildfires responsible for negative outcomes are more common in unmanaged forests with heavy fuel loads than in forests that have experienced naturally recurrent, low-intensity wildfires or prior forest treatments, such as thinning. **It is far easier to keep water in a basin clean, from the source headwaters and through each usage by recipients downstream, than to try and restore water quality once it is degraded.**<sup>7</sup>

-During 2016's Beaver Creek Fire, which burned 38,380 acres northwest of Walden, foresters and firefighters were given a glimpse into likely future challenges facing wildfire suppression and forest

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<sup>1</sup> See, USDA Forest Service; Kirst et al; 2013-2027 *National Insect and Disease Forest Risk Assessment*; January 2014 pg. 51.

<sup>2</sup> A complete copy of this report is enclosed with these comments for your reference as Exhibit 1. (hereinafter referred to as 2016 Forest Health report.

<sup>3</sup> See, <http://csfs.colostate.edu/2017/02/15/800-million-standing-dead-trees-colorado/>

<sup>4</sup> See, 2016 Forest Health Report at pg. 6

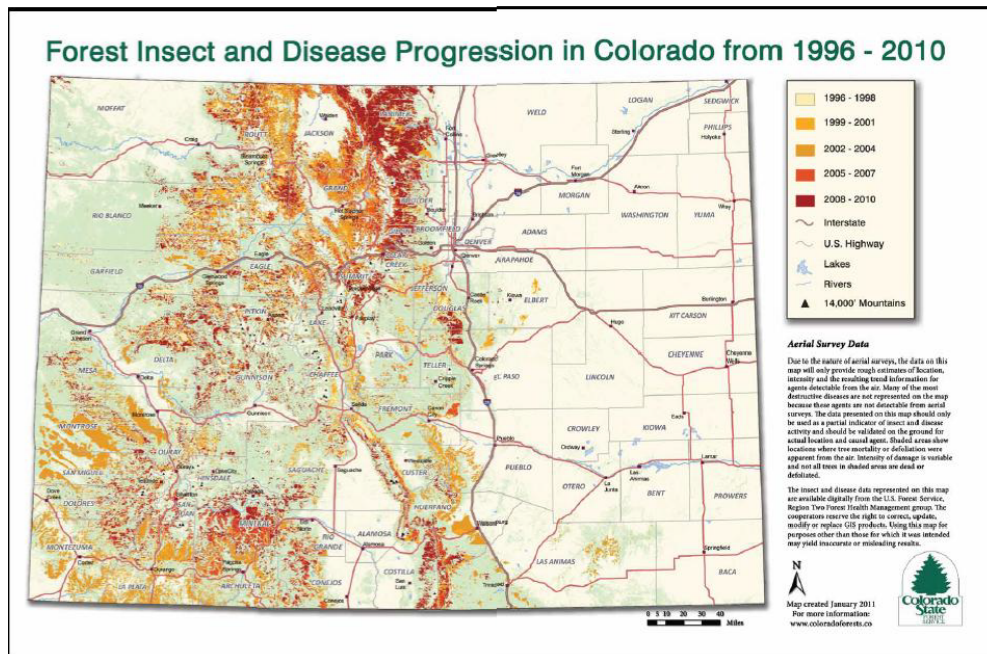
<sup>5</sup> See, 2016 Forest Health Report at pg. 24

<sup>6</sup> See, 2016 Forest Health Report at pg. 24

<sup>7</sup> 2016 Forest Health Report at pg. 24

management efforts. These include longer duration wildfires due to the amount and arrangement of heavy fuels. Observations from fire managers indicated that instead of small branches on live trees, the larger, dead fuels in jackstraw stands were the primary driver of fire spread.... “The hazards and fire behavior associated with this fuel type greatly reduce where firefighters can safely engage in suppression operations”<sup>8</sup>

The Colorado State Forest System has prepared an annual report on the declining forest health in the State for more than a decade and copies of these reports are available on their website. Clearly even the worst site-specific issues with any trail or road will never result in impacts comparable to those impacts addressed above. These are landscape level challenges that must be addressed with landscape level management.



USFS research indicates there is a huge correlation between Congressionally designated Wilderness and areas hardest hit by invasive species. A copy of the conclusions of this research is below. Research from the Colorado State Forest Service confirms that the minimal management allowed for forest health in Congressionally designated Wilderness areas has dramatically impacted forest health in the GMUG planning area.

Given the fact that 1 in 12 trees in the entire state of Colorado is dead, and based on the Organizations experience the GMUG, rates of forest mortality is significantly higher than the state average and that amount is increasing rather than even stabilizing, the Organizations must be opposed to any new management standards that would make timber management more difficult or impossible. The need to meaningfully address this challenge is compounded by projections from the USFS that Forest health will degrade even more significantly before ever improving. The Organizations vigorously assert that a healthy and sustainable forest is a critical component to ALL recreational activities in and around the GMUG and to

<sup>8</sup> 2016 Forest Health Report at pg. 5

the high quality of life that is associated with the communities in the planning area. The Organizations would also urge land managers to resist assertions that other smaller challenges are posing a similar scale threat to the GMUG planning area.

The relationship of poor forest health and heightened restrictions on management of public lands has also been repeatedly addressed by the USFS researchers. In a Rocky Mountain Research Station report reviewing the USFS response to the bark beetle outbreak, management restrictions were clearly and repeatedly identified as a major contributing factor to the outbreak and a major limitation on the response. This report clearly stated:

- Limited accessibility of terrain (only 25% of the outbreak area was accessible due to steep slopes, lack of existing roads, and land use designations such as Wilderness that precluded treatments needed to reduce susceptibility to insects and disease).<sup>9</sup>
- In general, mechanized treatments are prohibited in designated wilderness areas. The Arapaho Roosevelt, White River, and Routt National Forests in Colorado have a combined total of over one million acres of wilderness; the Medicine Bow National Forest in Wyoming has more than 78 thousand acres. A large portion of these wilderness acres have been impacted by the current bark beetle outbreak.<sup>10</sup>
- Owing to terrain, and to budgetary, economic and regulatory limitations—such as prohibitions on entering roadless areas and designated wilderness—active management will be applied to a small fraction (probably less than 15%) of the forest area killed by mountain pine beetles. Research studies conducted on the Sulphur Ranger District of the Arapaho-Roosevelt National Forest help us understand the implications of this situation.<sup>11</sup>

With clear management concern regarding the impacts of restrictive management on the pine beetle response, the Organizations must question any restrictions on active management of GMUG resources moving forward.

Many other researchers are now recognizing the negative impacts of Congressionally designated Wilderness on Forest Health and the ability to manage these areas in response to the challenges presented by the changing climate of the planet.<sup>12</sup>

Again these areas were much more heavily impacted than adjacent areas where management had been more active in nature. Given the clearly negative relationship between heightened management restrictions in an area and the more rapid and severe impacts to forest health, the Organizations must

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<sup>9</sup> See, USFS Rocky Mountain Research Station; "A review of the Forest Service Response: The Bark Beetle Outbreak in Northern Colorado and Southern Wyoming prepared at the request of Senator Mark Udall": September 2011 at pg. i. (Hereinafter referred to as the "Udall Forest Health Report")

<sup>10</sup> Udall Forest Health report at pg. 5

<sup>11</sup> Udall Forest Health Report at pg. 18

<sup>12</sup> Retzlaff, Molly L.; Leirfallom, Signe B.; Keane, Robert E. 2016. **A 20-year reassessment of the health and status of whitebark pine forests in the Bob Marshall Wilderness Complex, Montana**. Res. Note RMRS-RN-73. Fort Collins, CO: U.S. Department of Agriculture, Forest Service, Rocky Mountain Research Station. 10 p.

express serious concerns regarding any management in the new Forest Plan Revision that would make addressing forest health issues more difficult.

The Organizations would welcome a discussion of these topics and any other challenges that might be facing the GMUG National Forest at your convenience. Please feel free to contact Don Riggle at 725 Palomar Lane, Colorado Springs, 80906, Cell (719) 338- 4106 or William Alspach, P.E. at 675 Pembroke Drive, Woodland Park, CO 80863. Mr. Alspach's phone number is (719) 660-1259 and his email is [williamalspach@gmail.com](mailto:williamalspach@gmail.com).

Sincerely,



Scott Jones, Esq.  
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