June 2, 2018

Scott Armentrout

Forest Supervisor

Grand Mesa, Uncompahgre and Gunnison National Forests

2250 South Main Street

Delta, Colorado 81416

Dear Mr. Armentrout,

I am a professional biologist who spent 30 years managing natural resources on public lands. I am also a life-long outdoor recreationist. I cross-country ski, snowshoe, hike, fish, kayak, bird watch and camp on the GMUG National Forests. I am a member of the Great Old Broads for Wilderness, Grand Valley Anglers and Grand Valley Audubon. Having worked on several forest plans during my Forest Service career, I appreciate the importance and significance of the GMUG forest planning effort. The following are my scoping comments.

With the combined future impacts of a significantly increased recreating public and the likely impacts of climate change, the forest ecosystems will be under increased pressures. I am particularly concerned about the current and potential future impacts of motorized recreation on rare and fragile ecosystems and species. On the Uncompahgre Plateau rare, pure-strain Colorado cutthroat trout are found in nearly all streams that flow to the east from the Plateau. A recent Forest study found that 39 percent of conservation populations of Colorado River cutthroat are found in areas that have high erosion sensitivity. Unregulated OHV use is already having an impact on some of these streams, through unregulated stream crossings and mechanical damage to stream banks and riparian areas. With limited law enforcement capacity on the forest, this impact is likely to increase to the detriment of water quality and fish habitat. Kelso Creek and Dominguez proposed wilderness areas (see wilderness coalition proposal) are two areas that warrant special regulation to protect sensitive resources. Continuing to restrict OHV use to existing roads and trails and managing dispersed camping activities to minimize impacts to stream and riparian areas are important management strategies to protect these limited and sensitive resources and should be spelled out in the new forest plan.

On the Grand Mesa, motorized recreation uses are increasingly coming into conflict with resource protection and non-motorized uses. Some dispersed camping sites around popular lakes are already so heavily used that the lake shorelines consist solely of bare soil and are littered with trash. Hikers on trails that also allow motorized and mechanized uses have to cope with high speed motorized traffic and mountain bikes that do not slow down for people on foot. A future challenge for the forest will be to manage dispersed uses to minimize resource damage and to separate the various recreating publics to minimize conflicts between user groups. As demand for motorized trails increases, designating additional trails for hiking only as well as separate trails for mountain bikes will become increasingly important.

Increasing snowmobile use combined with fluctuating snowpack levels has the potential to cause future resource conflict. During low snow years, high volume off-trail snowmobile use can cause damage to wetlands and fragile alpine meadows through compaction. High levels of snow compaction can impact small mammals which depend on being able to tunnel through the snow to reach food caches. The forest should consider setting aside snowmobile-free zones to protect wetlands and particularly sensitive alpine areas. Current large roadless areas, such as Flattops/Elk Park, would benefit from snowmobile restrictions to protect their high wildlife, wetland and watershed values.

Kannah Creek watershed is both a municipal watershed and a high value wildlife and non-motorized recreation area close to Grand Junction. Protection from potential oil and gas development and associated facilities (roads, pipelines, etc.) through management direction or special designation is important to maintain the values for which the area is known.

The GMUG Forest Plan Assessments identified several ecosystems that will require special management attention in the new plan. Of particular concern are the riparian and wetland ecosystems which are rare as well as vulnerable to both climate change and anthropogenic stress. They also support a high percentage of at-risk species. An average of 40 percent of most riparian area ecosystems on the GMUG Forests are considered “functioning-at-risk”. Additional stress from both climate change and increased human uses could propel these areas into the impaired category without careful management. Of particular concern are cottonwood riparian woodlands, which are extremely limited in extent. Two thirds of these woodlands are in watersheds that are functioning-at-risk or impaired. Riparian areas are particularly vulnerable to overgrazing by livestock and impacts from OHV’s and other forms of motorized recreation and uses. Riparian areas deserve special management direction to avoid future degradation and to allow those areas at-risk to improve to a healthy ecological condition.

Sincerely,

/s/ Christine Jauhola

Christine Jauhola

Fruita, Colorado

Great Old Broads for Wilderness

Grand Valley Anglers