

Dear Jerry Krueger, Acting GMUG Forest Supervisor and planning team,

Thank you for accepting my comments on the working draft of the GMUG Forest Plan.

I really appreciate the 'working draft plan' step that you've added to the process. Thank you for giving the public lots of opportunity to participate in this important planning process! I also love the interactive story map. It's very helpful in trying to see what changes are being proposed. Thank you for that.

I am commenting on three primary areas of concern within the draft: Timber, Wilderness, and Recreation.

Timber:

It seems that the entire forest except for roadless areas and wilderness is now listed as "suitable for timber production."

About 971,000 acres out of the total 3,000,000 acres of the entire GMUG is proposed as suitable timber harvest. I'm very concerned that the GMUG Supervisor's office has given direction to allow slopes up to 60% grade to be considered suitable for timber harvest, a change from 40% maximum slope in past management practices. I understand the rationale: that slope alone shouldn't determine suitability of timber harvest area, and as technologies advance, there may be ways to harvest timber on steeper slopes without ecological damage. But at the same time, as technologies improve, it would give the public some peace of mind if we could know that all the criteria is met for preserving important wildlife corridors, while limiting new roads that may fragment these important corridors that connect wildlife habitat across multiple forests, and that sustainable regeneration is assured, and strong emphasis is placed on the carbon sequestration value of standing trees. I'd like to see specific standards for these values (and more!)

I'm concerned that *in addition* to the 971,000 acres that are proposed as suitable timber harvest, harvest may also occur for purposes other than timber production on lands not found suitable. Please provide clarification in the plan as to how much suitable timber lands are expected to produce timber.

Please also provide some assurances that the intent is to enable managers to use timber sales as a tool to achieve desired conditions in appropriate circumstances. The way it is written it seem that one third of the GMUG is available for timber harvest, and all other lands, if soils and slopes allow, could be harvested for commercial use.

I'd like the plan to better reflect emphasis of restoration of natural resources to make NFS lands more resilient to climate change, protect water resources, and improve forest health.

Additionally, Sustained Yield calculations allow for up to 1,389,762 CCF per decade, timber made vulnerable by fire, infestation, etc. notwithstanding. Please explain how these calculations will be implemented for commercial sale as well as expected treatment areas.

I'm also very concerned that with these higher densities of suitable areas, and determination of feasibility at the project level, the public will have to keep ourselves informed of every project, rather than trusting that the plan will ensure that timber harvest meets ecological and scenic desired conditions.

With the GMUG already accounting for nearly one-fifth of total net timber growth and a quarter of all growth on national forests in Colorado, the GMUG continues to be one of the largest commercial timber-producing forests in the Rocky Mountain Region. I worry that the fact that the largest remaining sawmill in the State of Colorado is located in Montrose and obtains its wood fiber within a 400-mile radius will drive timber production decisions rather than desired conditions of the forest determining management direction. Specific sustained yield calculations should be clearly identified along with assurances that long-term scenic resources, wildlife corridors, and all ecological factors are the foremost priorities.

Wilderness:

I don't understand why only 22,400 acres across the entire GMUG are recommended for wilderness, and only in areas contained within the San Juan Mountains Wilderness Bill and CORE Act. And while I appreciate the thorough inventory and assessment of wilderness, I don't understand your prioritization methods. I don't see the use of best available scientific information, acceptable current uses, or other clear rationale in your ranking. Some areas that were analyzed as wilderness and meet evaluation criteria don't seem to be included in your recommendations. The draft includes some very important recommended wilderness but ignores tens of thousands of acres that were recommended by the GMUG in 2006 in the last public revision process. Nor does it include any of the 40,000 acres that were in the SJMWA but have since been removed for various political and socio-economic reasons. Nothing has changed in these well-vetted proposed/recommended wilderness areas and they should be included in the draft working plan.

Specifically, please explain why the map in the working draft eliminated the northwest area of the proposed Sheep Mountain Special Interest Area as recommended wilderness or SIA and instead included it as General Forest (I'm referring to the part of Sheep Mountain that is on the

GMUG). Similarly, why is the far eastern portion of the Liberty Bell addition (high in Liberty Bell Basin) listed in the working draft as General Forest rather than Special Interest Area (not wilderness, I understand and support, to accommodate the Hardrock 100)? It is steep and inaccessible except to foot travel.

At the open house, I was told that only areas with local political support were included. Please don't preempt the public process by eliminating areas that have very high wilderness characteristics (such as the GPLI-recommended areas, Horsefly Creek, and Beaver Park to name a few) from the working draft plan. The Community Conservation Proposal is a very thorough inventory that includes careful scrutiny of areas that are deserving of recommendation.

The plan creates Management Area 3.1, which integrates the Colorado Roadless Rule's direction into the draft revised plan. However, standards and more than one desired condition should be included meet the intention of the Roadless Rule. Please include standards and guidelines of how the almost 197,000 acres of roadless lands will be protected under the Wildlife Management Area designation where the two overlap. More plan components are needed for the Wildlife Management Area to ensure roadless lands are protected, as required by the Colorado Roadless Rule. Additionally, the Forest Plan could clearly identify the role of Roadless Areas on our landscapes with reference to oil and gas leases that were active prior to the 2012 roadless rule.

The Lone Cone area should be protected as a Special Interest Area. The Beaver Park area, at present, does not allow mechanized travel and at the least, that should remain non-mechanized. That area does not link to other "stacked" mountain bike trails, is not in a concentrated recreation area, and is generally not suitable for mountain biking.

Thank you for prohibiting drones in wilderness areas. I would very much like to see them also prohibited in Research Natural Areas, Wildlife Management Areas, and all primitive areas and most ROS areas.

Recreation

The Forest Service appropriately recognizes the population growth and huge increase of visitor numbers to the GMUG, as recreation numbers continue to break records, and as recreation continues to dominate the economies of communities across the GMUG. Of the more than 80 million visitors to National Forest System Lands in Colorado each year, more than 2.5 million come to the GMUG to recreate and enjoy our shared public lands each year. While on the GMUG, these visitors and locals spend \$392 million annually on recreation (according to a study conducted by Outdoor Alliance). These visitors and locals provide myriad jobs and attract new businesses to communities across the GMUG. Population increases of full time and part time

residents is also driven by public lands recreation. Recreation is clearly the dominant economic driver on these forests.

With the explosive growth of summer and winter recreation across the GMUG, and to plan for yet-to-be-seen emerging technologies and advances in outdoor equipment, I believe that many more recreation standards must be included in the Plan.

I very strongly support the closure of motorized use in the east end of the Ophir Valley in the winter ROS. This is completely appropriate, as it is extremely dangerous terrain, and it would be highly inappropriate to have snowmobile activity in this “quiet use” area, close to the neighborhoods in the Town of Ophir, and in conflict with rapidly increasing skiing and snowshoeing activity in the forest around Ophir, where snowmobiles can cause significant safety risk to these backcountry users.

A couple of other suggestions:

The Forest Service should anticipate hard-to-imagine advances in snow-machines that will be able to access places that were never available to them before by securing the safety, quiet, and scenic integrity of the highest points in the GMUG, namely in the San Juan Mountains. Please, emphasize where snow machines aren't permitted (and that these prohibitions will be enforced.)

Snowmobiles should not be allowed in the Lone Cone area, and as I mentioned earlier I believe that area has wilderness characteristics and should be managed as an SIA or higher.

Summer Off Highway Vehicle use is exploding too, perhaps even faster than winter motorized recreation. Allowed OHV recreation should be very clearly concentrated in areas that already see motorized vehicle use; where damage to wildlife habitat, fragile ecosystems, and quiet neighborhoods isn't a risk. Please include a standard of use of gates to prohibit motorized vehicles in places where motorized vehicles are inappropriate. For example, the use of gates to keep motorized traffic where it belongs, on Ophir Pass Road, and away from where it's inappropriate in Waterfall Canyon, Swamp Canyon, Carbanero, and Chapman Gulch has been very effective and should be continued, and added in other areas across the GMUG High Country.

One other area that I'd like to see some standards put into place, is in the big increase of Special Use Permits for athletic competitive events. The increase in competitive athletic events has grown rapidly on the GMUG. I'm particularly aware of these events across the Uncompahgre Forest near Telluride. These events are a frequent occurrence, and while they “get the public out” on public lands and utilize high concentration recreation areas, some

requirements are needed for protection ecological systems, and to improve the shared experience by others who may be using the same land recreationally during these events.

One specific suggestion: Many of these events utilize plastic tape tied to trees and other features. The tape is often brightly colored or has the event logo. The problems with this type of marking is that a) it's unsightly! Users of the forests who are not participants in the races shouldn't have to have their eyes pulled away from natural beauty to look at bright plastic tape. 2) It creates garbage! I pick up a great deal of left-over lengths and scraps of this tape every year. The organizers, while well-meaning, rarely collect it all. 3) The tape is often placed all along the trail, when it is really only needed at intersections and areas that are obviously confusing for some specific reason.

When marking the route of running or biking events, permittees should be *required* to use markers similar to those used by the Hardrock 100: reusable, metal, with no bright colors; they are easily collected and don't leave trash behind and don't greatly diminish the landscape. And markers should be at the beginning and end of a route, and then only at intersections or places where there is obvious possibility of route confusion, rather than all along the route.