



**Office of the Mayor
Sean Murphy, Mayor**

July 29, 2019

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

Submitted via email: gmugforestplan@fs.fed.us

Dear Ms. Staley and GMUG Forest Planning Team,

Thank you for this opportunity to submit feedback on the Working Draft Plan of the Grand Mesa Uncompahgre Gunnison National Forest. We truly appreciate your public outreach efforts and facilitation of the public's ability to participate in these historic planning efforts. We have been engaged over the past 2 years at each stage of the revision process, and we commend the Forest Service for the tremendous research and information-gathering effort that has gone into this latest Plan.

Since 2008, the Town of Telluride has participated in crafting the San Juan Mountains Wilderness Bill, whose components are now part of the Colorado Outdoor Recreation and Economy (CORE) Act. We have consistently supported the San Juan Mountains Bill, and now support the CORE Act, as they represent years of collaborative work and accommodate multiple user and stakeholder groups, as well as the interests of our own Town. Not only do these places possess tremendous value for the clean water, clean air and other ecosystem services they provide, but Telluride's entire economy relies on the integrity of our local public lands.

We thank you for including you for including most of the lands in the original San Juan Mountains Wilderness Bill for wilderness consideration. We are disturbed to see that a large section of the proposed Sheep Mountain Special Management Area appears to have been left out of wilderness consideration. We ask to correct his oversight immediately. The boundaries as drawn in the current CORE Act reflect stakeholder compromise and agreement.

However, besides these places, we also believe that there are many other local areas that are worthy of administrative designations such as wilderness study areas, as the GMUG Forest Planning process moves forward. We believe that the wilderness and special management designation recommendations outlined in the Citizen's Conservation Proposal are the best tools for long-term protection of our future. This proposal represents a network of science-based, ground-truthed wildlands whose well-being and protection throughout the GMUG supports the health of our own local lands and wildlife. Please refer to this proposal to see the areas that we support for protection. Locally, this includes areas such as East Beaver Creek and the Lone Cone proposed Special Interest Area.

In general, throughout the working draft, we believe that more specific standards are needed if forest resources and values are to be protected. In areas such as timber, wildlife, or watershed management, a lack of specificity with respect to how goals are to be achieved renders protections meaningless, and "adaptive management" is not an acceptable substitute for concrete standards. Threatened, rare, and endangered species such as Gunnison Sage Grouse could be adversely affected if standards are not set

now and enforced. In addition, we would like to see the working draft take a more comprehensive view of climate change mitigation and adaptation, particularly when looking at timber values, and wildlife connectivity.

There is little direction on climate change in general in the draft, and as a high-altitude community where the impacts of climate change are rapidly accelerating, we believe this is a critical omission. Meanwhile, this draft dramatically expands the acreage to be considered for timber harvest and suggests that harvest could even happen in high-quality lynx habitat. Over the past few years, lynx have been found in various studies to show a preference for late successional forest habitat. As ever more of the GMUG National Forest is affected by climate change, we believe it is critical to protect those remnants of old growth or more mature forest wherever they exist. In the Telluride area, our local forest lands protect our water quality and quantity, as well as providing incredible habitat for a variety of wild species.

Thank you for your consideration of this feedback. Please let us know if you need any further information on any of the areas mentioned. We look forward to working with the Forest Service throughout the Forest Planning process.

Sincerely,

A handwritten signature in black ink that reads "Sean Murphy". The signature is written in a cursive, slightly slanted style.

Mayor Sean Murphy
Town of Telluride