

November 11, 2021

To Whom It May Concern,

As a Colorado nonprofit corporation whose mission is protecting and enhancing the health and sustainability of wildlife and public lands in the Gunnison Basin, Gunnison Wildlife Association (GWA) thanks you for the opportunity to provide comments on the Grand Mesa, Uncompahgre and Gunnison (GMUG) National Forests' Draft Revised Forest Plan and Draft Environmental Impact Statement.

Colorado's population is growing rapidly. According to 2020 U.S. Census data, the population of Gunnison County increased 10.4% between 2010 and 2020. This does not account for visitors to Gunnison County, many of whom recreate on National Forest lands during their stay. Over the last decade, Gunnison County Local Marketing District (LMD) tax collections – via a 4 percent lodging tax – provide a telling story of the continued growth of tourism and its impacts.

From 2012 to 2020, annual LMD collections increased from \$2,585,197 to \$5,002,136 – an increase of 93%. Amid growing visitation to our county, a growing population and resulting recreational and development impacts, the need for protection of wildlife and its habitat, as well as enhancements to this habitat, is stronger than ever.

Following are GWA's comments on specific aspects of the Draft Revised Forest Plan and Draft Environmental Impact Statement, with focus primarily on Alternatives B and D.

Alternative B vs. Alternative D

While we commend the GMUG for attempting to strike a balance between general active management and more restrictive management as outlined in Alternative B, the "blended" alternative, we do not believe this alternative does nearly enough to protect wildlife and its habitat in the face of increasing impacts from recreation and development and, in fact, places far too great of an emphasis on recreation – including opportunities for new recreational development.

GWA has a strong desire to see relatively unfragmented big game habitat and associated hunting opportunities maintained – if not increased and/or improved – across the GMUG, as well as limiting of any new recreational trail development. In accordance, GWA strongly supports the addition of Wilderness Management Areas as outlined in Alternative B. However, we believe that the recommended wilderness as reflected in Alternative D would do more to protect watersheds, wildlife and its habitat amid growing pressures from recreation and development.

Wildlife Management Areas and Wilderness

We are pleased to see that Alternative B would include 25 percent of the GMUG identified as a Wildlife Management Area. We view this as crucial to maintaining wildlife connectivity. Still, we are concerned by the Forest Service's statement that areas not identified as Wildlife Management Areas would be the starting point for future new trails. We believe that existing trails are more than sufficient for meeting recreational desire. For instance, we would note that while not within the purview of either the U.S. Forest Service or the Draft Forest Plan, recent trail development near the City of Gunnison on Bureau of Land Management lands at Signal Peak and Hartman Rocks provide a significant increase in trail-based

recreation opportunity. With this increase in opportunity for recreation in close proximity to population centers, we see no need for new trail development on nearby National Forest lands. Additionally, we believe the proposed route density standard of 1 trail mile per square within Wildlife Management Areas is too significantly too high if the focus within these areas is protecting wildlife.

The GMUG has received four separate citizen proposals for additional wilderness designation and a variety of additional management areas, although some would emphasize recreation. While Alternative B's inclusion of 34,000 acres to be managed as recommended wilderness adjacent to the existing Sneffels, Lizard Head, West Elk and Raggeds Wilderness areas is a step in the right direction, we do not think this number of acres is sufficient for protecting wildlife and its habitat amid increasing pressures from recreation and development.

Timber Suitability

Timber production and fuels treatments not only help to ensure the general health of the forest, but also improve habitat for wildlife. While we support a moderate approach to timber production and fuels treatments, we believe Alternative B goes too far and may adversely impact wildlife through significant construction of temporary roads that fragment habitat. In accordance with Alternative B, the Forest Service's projection of 55,000 CCF would mark an increase annually of more than 20,000 CCF as compared to the No Action Alternative. Similarly, we believe that salvage harvesting on the GMUG in recent years – reaching over 90,000 CCF per year in 2018 and 2019 – has adversely impacted wildlife, including by allowing greater pressure from motorized users on temporary roads.

Additionally, we are concerned with any timber production on slopes of greater than 40 percent and believe the 150,000 acres identified for fuels treatment in the second decade within Alternative B goes too far. We would like to see this figure closer to 50,000 acres per decade as identified in Alternative D. We also believe any final determination for timber suitability and/or harvest should include stringent stipulations on where harvest can take place as well as number of temporary roads in order to minimize impacts to wildlife.

We thank you greatly for the opportunity to provide comments on the Grand Mesa, Uncompahgre and Gunnison (GMUG) National Forests' Draft Revised Forest Plan and Draft Environmental Impact Statement and hope that our perspective as outlined above is included in the final plan.

Sincerely,



Cody Dyce

President

Gunnison Wildlife Association Board of Directors