November 24, 2021

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Dear Mr. Stewart and GMUG Planning Team,

Thank you for the opportunity to comment on the GMUG DRAFT Forest Plan (The Plan). The integrative, strategic, streamlined and adaptive approach in the planning process is much appreciated. Recognizing the need to address water protection and storage as being crucial to the landscape, is also appreciated. If forests are managed doing the same things that have always been done, we can expect the same result….catastrophic wildfires with damage to air quality, water quality, habitat and communities. It is time for a more active forest management approach. This Plan, for the most part, looks to the future by considering the most up-to-date facts and science which leads to a sensible, responsible Plan. While these comments are not exhaustive, it is hoped that many areas of emphasis are covered. As always, all the tools in the toolbox of forest management need to be utilized and the responsible use of these tools should not be limited in the planning process or in any land use process.

As a private citizen with a history of involvement in forest health and watershed matters, I have learned many lessons. I am a current property owner in Hinsdale County and a former County Commissioner (January, 2011 - January, 2019). The County’s traditional stand has been to oppose any new Wilderness and to support increased forest management for the health and safety of visitors and residents of Hinsdale County. As a County that is over 96% public land of which nearly 50% is either Wilderness or de facto Wilderness, the wildfire risk continues to be a danger facing almost all areas of the County. As recently as 2018, Hinsdale County opposed adding more Wilderness as it increases risk to water-quality, air-quality, habitat and trees, especially those weakened by drought and beetle infestation. Hinsdale County also went on record, until recently, opposing GPLI and the CORE Act. As a County Commissioner during both the Little Sand Fire and Papoose Fire (part of the West Fork Complex), the need for increased forest management was graphically exposed. Common phrases within the community were “choose big smoke or small smoke” and “better going out on a truck than up in smoke”. In other words, there was great public support for prescribed burns and timbering to improve forest health. Ingress and egress with regards to the population center, Lake City, were addressed following the Papoose Fire, but it was clearly recognized that protecting that area alone was inadequate to addressing the larger issues of air quality and water quality which happen both outside and inside of the WUI. Either the WUI needs to be redefined, or active managements need to extend well-beyond the currently defined WUI.

**Goals and Objectives that I support in the Plan**:

--we can all agree that our goal is a healthy forest, trees that sequester carbon and produce oxygen, healthy waterways and watersheds, recreation for all, safe forests and safe communities. The question is always, “How do we get there?”

Coalition building, public involvement, transparency:

The Plan revision process has given great opportunity for all to give input and voice opinions regarding the future of the GMUG. The GMUG has consistently encouraged public involvement in forest management plans and decisions. Processes currently in place are being and will be utilized to produce a good outcome. As an example of coalition building: The GMUG has been a model of coalition success in the creation and ongoing activities of SBEADMR. Assessments over time, transparency and public input are hallmarks of this process. Every stakeholder group must be at the table, or the outcome will be flawed. The GMUG, with one example being SBEADMR, has proven success in building and working within coalitions.

Resilient, healthy forest:

As an advocate for carbon sequestration, I am compelled to support active forest management. Trees are a renewable source of permanent carbon sequestration if they are healthy and breathing. Active forest management moves the forests to health and away from being carbon producers to being carbon sequesterers. Timber products sequester carbon for an extended period of time making wood products a logical area of support.

Forests need to be managed at landscape scales, far beyond the current definition of WUI..

New Wilderness designations will further impede the land managers’ ability to work towards a healthy resilient forest so that they can store water and sequester carbon. A healthy tree takes carbon out of the air and produces oxygen. Currently, Colorado forests are carbon producing. If the goal is to reduce carbon, it only makes sense to give trees room to breathe and grow.

The GMUG has historically demonstrated a deep understanding of the relationship between the timbering industry (including large and small mills), the forest, wildfire and the communities impacted with jobs and livelihoods throughout Colorado. Especially the small mills have contracts that can give a big socio-economic boost to those communities. I support all aspects of the Plan that increase forest resilience through active management. All tools must be used to benefit wildlife, habitat, communities, water supplies, and air quality. This Plan allows for maximum responsible forest management, especially Alternative C.

With the advent of less-expensive steep-slope timbering practices (PONSSE), even steep slopes can be managed for forest health. The Plan should encourage evaluation of new areas, new opportunities and new techniques for timbering, for more wildfire mitigation, more socio-economic benefit, and more carbon sequestration. This Plan should empower the forest land managers to use all available tools to continue and increase responsible, sensible forest management to restore the forests to health.

Additionally, grazing benefits forests by reducing low fuels and managing the land by ranchers and herders. Grazing should be increased at every opportunity.

Communities:

Risk to communities is even more than losing structures and values at risk within those communities. Smoke (air quality) and diminished water quality put communities at risk…Wilderness designations lead to unhealthy forests which lead to tremendous community water, air and land risks. Smoke travels far and impacts the health of many; post-fire residue in water also travels far and has tremendous impact on water systems within the WUI, nevermind the negative impacts on fish and other wildlife.

All tools must be utilized to provide for public safety and municipal water protection.

In addition, since the GMUG counties depend, at least in part, on tourism as a part of their economy, our visitors depend upon good forest management to keep them and their health safe as much as possible.

The socio-economic component should include the encouragement of multiple industries. These should include timbering and mills of all sizes, recreation, agriculture, and tourism.

Recreation-quality, safety, access:

Recreation opportunities should be for ALL, not just the young and healthy; no one should be left out of the opportunity to enjoy the GMUG. Forest health is necessary for access, safety, enjoyment of our public lands for ALL as much as they are able. Wilderness limits these options and therefore, is a hindrance to public land access for ALL.

The forest is not static. Without significant forest management, the forests become overcrowded and unhealthy, leading to wildfire. Following fire, the forests are even more unsafe. Forest management helps to keep them safe.

Again, I support active forest management to improve recreation opportunities for ALL, safety and a more healthy environment.

**Areas of Concern**:

Water:

Forests are the largest reservoirs…IF they are healthy. Water considerations should permeate all aspects of forest use and this Plan. New Wilderness, and some other special designations, put our water at risk. Water, source to use, must be overlayed and considered in all forest management decisions as well as any special designations. Healthy watersheds impact recreation, public safety, wildfire reduction, air quality, etc. As we see new and larger wildfire behavior, measures should be taken to improve the health of the forest and ensure secure, sustainable supplies of clean water. Municipal water, agricultural water, and water throughout watersheds needs to be protected through management. Forest health treatments should be large and address more than just the WUI. They should effectively address the threat of catastrophic wildfire throughout critical watersheds. The forest is not static, but dynamic and ever-changing. We have learned many lessons in the last few years, especially that all tools must be used as needed to keep the forest healthy and thus, keep our watersheds healthy. In this Plan, water planning deserves a stronger emphasis than is in the current draft. Historically, watershed hydrologic function has been the only emphasis in planning. It is of paramount importance to recognize the relationship between forest health and municipal/agricultural water protection. This should lead to identifying critical watersheds and, in those watersheds, expanded active forest management. This emphasis should be more deeply examined and strong language added to the Plan to allow for more work from all angles to protect our water, source to use!

NO NEW WILDERNESS:

Wilderness and other Special Designations should be minimized so that active forest management can be increased for the good of recreation, water, communities and the forest itself. Forest access should be available to ALL. The current Wilderness and de facto inventory give AMPLE opportunity to experience the values of The Wilderness Act of 1964. There is no need to risk forest health by adding additional Wilderness. Two of the possible alternatives recommend new Wilderness. This recommendation alone disqualifies those alternatives.

Additionally, Wilderness, just by its nature can only be used by those physically able to access that area. ANYTHING further limiting ADA Recreation opportunities should not be considered.

Conclusion:

Thank you for the opportunity to comment on the current GMUG Forest Plan. Please forgive the redundancy as I saw similar issues that impacted a variety of areas. It is critical that updated, not outdated, policies be applied in this new challenging time. This Plan should be a comprehensive, multi-use document that leads into the future and leaves no one behind. The Forest Plan should empower public land managers to do what they are trained to do-use all the tools in the tool box to meet the objectives of a healthy, resilient forest. A healthy forest, achieved by using all available tools in a responsible manner, can increase water storage capacity, carbon sequestration, improved socio-economic conditions, use of existing industry, prioritizing watersheds, and reducing the number of special designations (which only make responsible forest management more difficult)

The multi-use mission of the USFS is best accomplished through active forest management utilizing all appropriate tools, used by those who know the forest best.

Respectfully,

Cindy Dozier

Club 20 Immediate Past Board Chair

Former Hinsdale County Commissioner (January, 2011-January,2019)

Note: Sitting County Commissioner during Little Sand Fire, Papoose Fire (Part of the West Fork Complex)

Resident and property owner, Montrose County

Property owner, Hinsdale County