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Organization:

Title:

Comments: December 6, 2017

TO: GMUG Forest Planning Personnel,

Thank you for allowing us to submit our comments on the 2017 GMUG Forest Plan.

My family has owned property in Hubbard Park since 1914 from an original US patent. Our property is located in an area 20 miles north of Paonia, in Delta County in the Paonia District of the Gunnison National Forest. We have been actively involved with participation and input in the management of this area since the previous EIS completed in 1986.

We (my family and other concerned individuals) have attempted to digest the 15 individual Assessment Topic reports provided by the Forest Service, however, these are such broad brush and forest wide assessments that it is extremely difficult to 1) comprehensively review them, 2) reasonably digest them putting the pieces of the puzzle together and 3) apply them to specific areas giving meaningful comments.

With that stated, I have divided our initial comments into separate categories, primarily focused on that part of the Gunnison National Forest in and around Hubbard Park:

Our comments are directed to these categories:

- I. HISTORIC DECISIONS BY THE FOREST SERVICE
- II. WILDLIFE MANAGEMENT, THREATENED SPECIES
- III. NON-ROADED AREAS
- IV. GEOLOGIC FORMATIONS AND SOIL MOVEMENT
- V. OIL AND GAS EXPLORATION
- VI. MITIGATION AND FUNDING
- VII. SUSTAINABLE MULTIPLE USE DOCTRINE

HISTORIC DECISIONS BY THE FOREST SERVICE:

The Forest Service issued a ROD in 1986 from the original EIS. The 1986 decision allowed timber sale activities from June 15 to Sept. 30, this was applied to local & collector roads.

In 1997 the Forest signed a supplement to the 1986 decision extending the logging season (Alternative 2). The 1997 supplemental decision extended timber harvest within limited sale areas from June 15 to Dec 1 except for log hauling which was not allowed during 1st and second rifle seasons.

The Stevens Gulch & Related Timber Sale EIS and any changes having to do with big game were focused on mitigations relating to timber sale activities. ATV's became prevalent in the mid- 90's. The Forest Service began working on travel management to designate open roads/trails, not allowing x-country motorized travel. We worked with WESERC, the CDOW, the Elk Foundation, the Forest Service and others to map 120 miles of unauthorized ATV trails. This effort aided the FS in closing all identified roads and trails. Further, we raised monies from both private and public entities to pay for and install non-motorized signs throughout this area. In addition we worked with the Elk Foundation to fund reforestation and seeding of the closed trails.

The FS analyzed & implemented the Gunnison Travel Management Plan which designates areas open for motorized travel (see link to map). Paonia District Motor Vehicle Use Map:
https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3838524.pdf

Under joint cooperation between these individuals and entities it was established that there were and continue to be no roads in the Hubbard Park nor Electric Mountain areas designated as open for motorized vehicles.

WILDLIFE MANAGEMENT, THREATENED SPECIES:

During the above described process, we worked with the Colorado DOW, now Parks and Wildlife to identify various wildlife species and elk calving areas. This area is currently home to a significant elk herd, numerous moose, deer, fox, sage grouse, black bear, bobcat, Canadian lynx, weasels and pine martin. Needless to say the wildlife enhancement efforts including the road closures have been widely successful.

In addition, there are a number of Raptors located across this area. These include; Red Tailed Hawks, Osprey, and Goshawks. Attached are area maps for the Canadian Lynx, Moose, the Gunnison Sage Grouse and Elk in this area. In our opinion these maps are not current and while they give an indication of the wildlife around the Hubbard Park and Electric Mountain area, they fall short of identifying the true wildlife habitat areas. We have spotted Moose in Hubbard Park. We've personally seen lynx, bobcat and pine martin. We've also seen different varieties of sage grouse, both on the east side of Electric Mountain and in the dense timber west of the Overland ditch. The Gunnison Sage Grouse map shows Hubbard Park directly between the known Gunnison Sage Grouse habitat north of Paonia and southeast of Colbran.

The Stevens Gulch and Related Timber Sales EIS decision made in 1986 (Alternative 10 with modifications) has been a success. The area surrounding Hubbard Park and Electric Mountain contain prime elk calving areas and benefits a wide variety of wildlife species, including some protected and threatened species. This area should continue to be protected from any new surface disturbance.

See Attachment #1, Potential Lynx Habitat

See Attachment #2, Gunnison Sage Grouse Historical Habitat

See Attachment #3, Moose Concentration Areas

See Attachment #4, Elk Habitat Near Hubbard Park

NON ROADED AREAS: There are several areas which are designated Roadless. These stem from the original Rare II Lands Study and were confirmed during the 1986 ROD and more recently in the Travel Management Plan. There are two primary designated areas, 1) that area west of the Overland reservoir and west of the Overland Ditch and 2) the east side of Electric Mountain.

In addition, as previously mentioned there are no "open areas" allowing unauthorized motor vehicles. The areas of primary concern are that area west of the Stephens Gulch road and east of the Overland Ditch, bounded on the north by Cow Creek and the remaining area of Electric Mountain east of the Hayden Curecanti Power Line. These areas contains essential wildlife habitat and prime elk calving areas, as well as those wildlife species and raptors mentioned previously. This area currently has no motorized roads nor trails. We are hopeful that the FS will continue to recognize these areas as non-roaded and restrict any surface activities therein.

GEOLOGIC FORMATIONS AND SOIL MOVEMENT: One of our greatest concerns is preponderance of soil movement, landslides and mud slides throughout this area. There exists old lava flows, lava formations and past landslides throughout this area. As Map 7 from the GMUG Forest Plan Revision dated May 16th, 2017 shows the amount of Geohazards stretching from the Paonia Reservoir to the Lombard slides to the massive 3 mile long mud slide just south of Colbran. The underlying geologic formations are conducive to soil movement in this area. Oil and gas drilling in this area would inject massive amounts of fracking fluid which no one can predict the resulting soils movement. This could potentially affect streams and fisheries, domestic wells and springs and irrigation water near the Hubbard Park, Electric Mountain area including the Overland Reservoir, the Overland irrigation ditch and the agricultural community in the North Fork Valley. Has the Forest Service conducted any soils sampling across this area to determine the probability of causing more soils movement and or landslides from Oil and Gas drilling. Are there any reports indicating the various geographic formations, including the depth of such formations and the location and depth of the lava formations?

As mentioned, during the last forest management planning process there were several roads and trails closed for

"restoration of vegetation and enhancement of wildlife habitat". I have included two pictures from this area showing the signs that we helped fund and were installed for this management purpose. These were part of the mitigation measures prescribed by the Chief resulting from the NRDC appeal of the existing Forest Plan. Will the new Forest Plan provide for the continuation of these mitigation measures regarding wildlife enhancement in this area?

This area contains exceptional habitat for several species including the Canada Lynx, Sage Grouse, Elk, and Moose. The previously displayed wildlife maps included in this document were created using data gathered from Colorado Parks and Wildlife showing the range of these species.

I would like to see language in the new forest management plan that protects this area from oil and gas extraction and manages the area for non-motorized recreation and wildlife enhancement.

OIL AND GAS EXPLORATION: Various conservation entities and news reports have implied that there is a Federal Executive Branch bias for both the US Forest Service and the BLM to allow Oil and Gas exploration in all possible areas regardless of other interests, impacts or uses. We are optimistic that the US Forest Service will make a balanced and comprehensive review, evaluating all alternatives including a combination of various uses which may act synergistically and not open all areas to Oil and gas exploration. It is not reasonable nor logical to open all federal lands outside "Wilderness Designation" or "Roadless" to a single use.

See Attachment #5, GMUG Oil and Gas Lease Stipulations

See Attachment #6 GMUG Adjusted 1993 Oil and Gas Leasing Decision

MITIGATION AND FUNDING: Our experience and observations over the last 40 years with working with the Forest Service to manage and implement the previous mitigation measures, which were directed inside the ROD and resulting from the appeal by the NRDC, were successful. However over years of administration and intermittent funding issues, some of these mitigation measures have either fallen by the wayside or been ignored completely. The Forest Plan ultimately will identify the implementation of numerous prescriptions which will necessarily include mitigation measures to justify the uses prescribed. The implementation of these mitigation measures by the Forest Service is dependent upon staffing and federal funding. It should be incumbent upon the FS to assure implementation of any and all mitigation measures before opening up any lands where long established multiple use has been successful. As previously mentioned we helped raise funds to create road and trail closures and create signage and forest regeneration. A number of these signs are gone or in disrepair, (see attached pictures). Construction of the Stephens Gulch road was justified by the 1986 ROD. The road is in disrepair and the underlayment is surfacing and being destroyed between Windy Point and the Overland Reservoir turnout, (see attached picture). While the collective efforts have been successful in maintaining this area for wildlife enhancement and non-motorized use, the FS needs to continue to maintain the signage and road closures.

See Attachments #7 and #8, Underlayment Surfacing On Stephens Gulch Road

See Attachment #9, Sign, Closes to Motorized Use

See Attachment #10, Sign, Area Road Closed - Revegetation

SUSTAINABLE, MULTIPLE USE DOCTRINE: Sustainable Multi Use does not mean all uses must be allowed in all areas. In fact, to create a balance sustainable forest with multiple use and public enjoyment in different prescriptions should be designated in different areas. All uses should not be included in all areas. Our family and others have worked over the last four decades to help the forest service establish and maintain an area identified for great wildlife and unique recreational experience, allowing hiking, biking, horseback riding, camping, fishing and hunting. We do not see a justification to deny the success which has been achieved in this area by opening it up to other incompatible uses.

Conclusion and Requests: We respectfully request the following;

- 1)The Forest Service recognize the success for Wildlife Management and Habitat Enhancement including Road and Trail Closures in the Hubbard Park and Electric Mountain area and continue this prescription as non-motorized.
- 2)That the Forest Service conduct a full geologic study, including core drilling soils samples to determine the Geohazzards in this area (and depth of same) and restricts any Oil and Gas Drilling and Exploration in a ten mile radius around this area.
- 3)The Forest Service conduct detailed investigation of the habitat for moose, lynx, grouse and Raptors in this area.
- 4)That the Forest Service commit to fully funding and implementing all mitigation measures, past and present, including maintaining road and trail closures and signage.

Respectfully Submitted,
Pat and Donna Stucker

CC:Luke Danielson, Esquire
Mark and Kristen Favro
Grant and Shaelyn Stucker

1986 Decision:

https://books.google.com/books?id=WSk3AQAAAMAAJ&pg=PA2&lpg=PA2&dq=hubbard+park+wildlife+closure&source=bl&ots=UZUC9yNSjS&sig=dCr6Fy8VKgDUqNSV6j1LCIYogsg&hl=en&sa=X&ved=0ahUKEwiQjPHSv_HXAhVryoMKHV14DhsQ6AEIYzAP#v=onepage&q=hubbard%20park%20wildlife%20closure&f=false

1997 Decision:

https://books.google.com/books?id=8pg2AQAAAMAAJ&pg=PA2&lpg=PA2&dq=steven+gulch+hubbard+park+wildlife+closure&source=bl&ots=94II_T-qAU&sig=Dwe7KgeufxL9p6MkUYVXCCLHaHo&hl=en&sa=X&ved=0ahUKEwixqtXovPHXAhUG24MKHcuWCqYQ6AEIQjAH#v=onepage&q=steven%20gulch%20hubbard%20park%20wildlife%20closure&f=false

Paonia District Motor Vehicle Use Map:

https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprd3838524.pdf