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Comments: I appreciate the opportunity to submit scoping comments during the GMUG Forest Plan revision process.

Though adaptive management is an appealing method in theory, I fear with limited USFS resources and continuing budget cuts, such a method could result in the reduction of attention to ecosystem integrity and resiliency due to an inability to stay abreast of changing conditions. Specific standards and guidelines must be drafted in all areas of concern to assist in any adaptive management approach. At a minimum, the outcomes for any adaptive management plan should be very specific, clear and lend themselves toward maintenance of or improvements toward healthy, sustainable, resilient ecosystems.

I have deep concerns about grazing on our national forests especially in designated wilderness. Across the landscape and specifically in the Cimarron Range and Uncompahgre Wilderness, I have witnessed erosion of streambeds, excessive mud mixed with stock feces, and overgrazing. Erosion in the West Fork of the Cimarron is particularly memorable as cattle hover, lay and traverse the fragile riparian habitat on the approach to the West Fork Pass. During the season of 2017, I experienced a repulsive hike along the East Fork Trail of the Cimarron where the stench from feces was abhorrent and the mud/feces substrate underfoot was slippery and disgusting. People's desire to avoid the mess resulted in a widening of the trail and user created side paths.

Though I do not believe Wilderness should be managed foremost with people in mind (given that ecosystem integrity and resiliency should be the priority) I have had numerous unpleasant experiences with stock - sheep and their guard dogs in particular - in the high country. I don't mind hiking around (or even through, if safe) a flock of sheep, however I am troubled by being chased by guard dogs as happened on the flank of Wildhorse Peak or by having my camp ransacked by guard dogs as occurred in the upper Middle Fork of the Cimarron. In both cases, I planned my hike and campsite respectively to avoid the flocks, however the sheep move daily, and one cannot always predict where they will be. Moreover, I have more than once, and most recently in the American Lake area of the Uncompahgre Wilderness, found myself on landscapes where literally there was no place free of domestic sheep feces to pitch my tent or sit. A feces-littered landscape and a bleating-filled airspace is not, in my opinion, wilderness.

I am even more concerned about our dwindling Bighorn Sheep population and threats to their health. The GMUG Scoping Report states:

Consider plan direction to minimize wildlife and livestock conflicts (elk, bighorn sheep, etc.) in coordination with permittees and the appropriate agencies, such as U.S. Fish and Wildlife Service, Wildlife Services (USDA), and Colorado Parks and Wildlife.

The 2012 Western Association of Fish and Wildlife Agencies' report entitled "Domestic sheep and goat management in wild sheep habitat," recommends a nine-mile separation between domestic and wild sheep. I know from my own personal experience in the Uncompahgre Forest, that not only does this buffer not exist, but in fact the ranges of wild and domestic sheep overlap. I recommend that the GMUG re-evaluate all grazing permits that infringe on bighorn sheep range and consider closing, relocating, and/or reducing the size and grazing duration on these allotments. Such practices have occurred in the Conejos District of the Rio Grande Forest with positive results.

I am pleased to see the emphasis on healthy ecosystems mentioned repeatedly in the scoping document:

*Provide direction for ecosystem-based management at a landscape-scale. Emphasize maintenance and restoration of ecosystem function.

*Consider direction that takes into account a changing climate, including adaptive responses to impacts of climate change (i.e., more frequent and larger disturbance events). The focus should be on maintaining ecosystem resiliency in order to continue to provide multiple uses and ecosystem services.

*Provide direction to maintain or restore key ecosystem characteristics that benefit multiple species.

I recommend this goal be the highest priority of the GMUG planning team during this revision process. In consideration of this greatest goal, I ask that new trail development - motorized, mechanized and quiet use - be kept to an absolute minimum - and only developed in areas that have already been "sacrificed" for recreational use. These bullets in the report give me cause for concern:

*Plan for increased trail development that concentrates uses in sustainable settings. (I appreciate the "sustainable" clause.)

*Consider a landscape-scale strategy to provide adequate motorized recreation opportunities as well as acceptable levels of noise heard within non-motorized areas.

With our growing resident population on the western slope coupled with increased tourism and recreation, there will always be demand for new trails. I believe it is the agency's responsibility and my hope that resilient, intact ecosystems will take precedence over recreational use. Given our changing climate and all the crises associated with it - drought, wildfires, extreme winds, super storms, species loss and/or migration, etc. - the integrity of our ecological values must be prioritized for the benefit of watersheds, wildlife, rare species, air quality and carbon sequestration. Habitat fragmentation is one of the greatest challenges of our time as land stewards given impacts from roads, fences, trails, extractive industries, etc. Maintaining wildlife corridors is critical to sustainable ecosystems.

Thank you again for the opportunity to provide input during this forest plan revision process.

Respectfully,
Robyn Cascade