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First name: Suzanne

Last name: Jackson

Organization: Colorado Wild Public Lands

Title:

Comments: Dear Mr. Krueger and the Planning Team,

RE: Comments regarding DRAFT GMUG Forest Plan

Thank you for the opportunity to comment on the working draft of the revised GMUG Forest Plan. We appreciate all the hard work and time that the Forest Service staff have put into the Plan to date. We attended the Public Open House meetings in Palisades and Gunnison and were impressed with the information and knowledgeable staff.

There are many aspects of the Plan that Colorado Wild Public Lands (COWPL) is in agreement with. However, as a general comment, we believe that the emphasis on environmental protection needs to be strengthened, for the following reasons:

Our natural environmental resources are constantly under pressure for change and diminution. We, as humans, derive many benefits from our natural world including clean air to breathe, clean water to drink and grow food, as well as health, medicine, relaxation, recreation, inspiration and well-being. Ecosystems that have taken hundreds to thousands of years to become established and provide us those benefits, can, if allowed, be destroyed by humans and machinery in minutes.

In recent times we are seeing increased changes on our planet due to climate change. Most of those changes impact the human race and the natural world in negative ways, potentially resulting in loss of life and enormous economic costs. While there are many unknowns ahead as the climate warms, glaciers melt, and land and communities become flooded, we know through scientific study that intact natural systems can help slow this trend. Forests, plants and soils process and remove carbon from the atmosphere, helping to reduce the levels of carbon that lead to climate change. Therefore, it is important to preserve large naturally vegetated areas that will also provide room for species to adapt to climate change conditions.

View from Silver Creek Trail on route to Oh-Be-Joyful Pass near Kebler Pass

While our Forests are also home to natural resources such as timber, oil, gas and minerals, we need to be

cognizant that the short-term benefits derived from extracting these type of resources do not balance with the long term negative repercussions for our natural ecosystems, the fresh air and the clean water that keep us as humans alive.

Recreation is an important source of human well-being and also of economic gain to communities. The Forest supports motorized and non-motorized uses and includes a range of management objectives for different areas. Overall, COWPL advocates for management of current uses and no additional development for recreational uses that would occur at the expense of ecosystem preservation.

The following are COWPL's specific areas of concern and requests for additional protection of resources. Most are described as proposed changes to the Desired Conditions, Objectives, Standards and Guidelines of the Revised GMUG Forest Plan:

#### Project and Activity Consistency with the Forest Plan

When a proposed project or activity would not be consistent with the applicable plan components, the responsible official can do one of four actions. The first two (pages 13-14) are to either reject or make the proposal consistent. The third option listed is to amend the Plan.

We request that Plan Amendments be discouraged. They should only be exercised when doing so results in substantial public benefit; this should NOT be used to support requests by private entities (which benefit the entity and not the public). Additionally, the agency should track the exercise of this discretion so as to monitor frequency of use, types of beneficiary projects, and resulting public losses and benefits. We suggest there be public noticing of the Forest

Supervisor's consideration to amend the Forest Plan. Contemporaneous amendments should not be included or allowed.

#### FOREST WIDE DIRECTION

##### Social and Economic Environment

FW-DC-PART-01: Include direction that public/private partnerships must provide demonstrable public benefit and that private partners are held accountable to the outcomes.

##### Air Quality

FW-DC-AQ-02: Include Class II Areas in this desired condition.

FW-DC-AQ-03: Not needed if Class II Areas are included in -02, per above. FW-OBJ-AQ-04: Include all Class II Areas.

FW-STND-AQ-07: Include PREVENTING airborne nutrient and mercury deposition in all lakes and water bodies in Class I and Class II area.

FW-GDL-AQ-08: Include all Class II Areas.

### Key Ecosystem Characteristics

FW-GDL-ECO-10: The direction to retain smaller stands of Old Growth should not be limited to stands that are difficult to reach; it should apply throughout the forest due to the unique habitats provided by Old Growth.

### Terrestrial Ecosystems and Vegetation (TEV) Alpine Uplands

FW-STND-TEV-05: PROHIBIT Campfires in alpine ecosystems.

### Riparian Management Zone (RMGD)

FW-STND-RMGD-07: Riparian management zones (Figure 4, Figure 5) Increase the 100- foot slope distance to 200-feet for both categories.

Make all the guidelines in this category minimum standards. In addition to the location standards, locations should be outside of the management areas and where the proposed activities have NO impact on the riparian resources.

### Native Species Diversity General Species Diversity

There is emphasis on maintaining and enhancing habitat connectivity in this draft, including specific management actions and approaches to support native species diversity generally and to support and enhance pollinator, sage grouse and lynx habitat. We support the goals of maintaining and enhancing habitat connectivity. However, the agency should seek opportunities to undertake these objectives in ways that emphasize public ownership and stewardship of these public resources. The agency should not rely over much on partnerships with private landowners that essentially privatize the natural populations. Where partnering exists, the Agency should engage in monitoring habitat maintenance and improvements on private land, especially if that land has previously been in public ownership.

FW-DC-SPEC-01: Human disturbance to wildlife and fish is not increased over conditions existing at the time of Plan publication. Where current human disturbance impacts vital functions of the life history of wildlife and fish, the human disturbance will be reduced so there are no longer such impacts.

FW-GDL-SPEC-06: New infrastructure should NOT be installed where it would reduce habitat connectivity. Existing infrastructure that reduces habitat connectivity should be modified or removed to reduce impacts.

FW-GDL-SPEC-06: [hellip] utilize buffers and timing restrictions. (Remove "or")

#### Big Game Species

FW-STND-SPEC-16: Add a standard as follows: Relatively undisturbed areas providing habitat blocks to be maintained intact and not fragmented by roads, trails or other infrastructure.

FW-GDL-SPEC-17: Make this guideline a standard. Add ... activities that displace or impact[hellip]

#### Gunnison Sage-Grouse

FW-OBJ-SPEC-31: Change the language to require that owners leash their pets, not request it. Cite pertinent regulations and amounts of fines that may be levied.

#### Canada Lynx

FW-STND-SPEC-52: NO harvest activities or infrastructure in stands that represent high quality lynx habitat.

#### Conservation Watershed Network

New Standard: Preserve conservation watershed networks. No new activities or infrastructure that would impact these areas.

#### Paleontology (PLEO)

FW-DC-PLEO-01: Paleontological resources are managed for protection of resources. No new infrastructure or activities in areas that have paleontological resources other than educational/interpretation, research and cultural uses. Limited foot trail creation for educational purposes.

Add standards per above.

#### Watersheds and Water Resources (WTR)

FW-DC-WTR-02: The Forest Service, stakeholders and affected communities actively coordinate in sustaining ecological and hydrologic processes to continue to provide critical water supplies to communities and water users. Similarly, all coordinate to maintain high quality water conditions in all waterbodies, streams and creeks, with special protection for watersheds serving as community drinking water and for growing food.

FW-STND-WTR-05: There should be NO projects in the riparian management zone.

Add standards addressing maintaining high water quality, especially in relation to any proposed oil, gas, mining or gravel extraction and in relation to impacts of logging activities.

Appendix 3: Add a bullet point with direction to retain river frontage and existing public access from land and water to lands along river and stream corridors.

#### Cultural and Historic Resources

Add a standard: No infrastructure, extraction or other development besides education/interpretive signs and foot trails at cultural and historic resource locations. Determine a buffer beyond the size of the resource to protect the resource in relation to any proposed activity.

Add a standard: Cultural and historic resources to be studied and documented at a holistic or landscape scale. The integrity and connectivity of groups of resources and/or related resources will be maintained.

#### Leaseable Minerals and Energy Resources

Include an objective of discouraging new mineral leases in Roadless Areas

#### Lands and Special Uses Lands

Generally, we support objectives and actions that maintain public ownership, stewardship and access. Actions undertaken to meet the objectives prescribed in this management plan should

reinforce these goals, emphasize public benefit, and discourage the privatization of public resources.

FW-DC-LSU-01: Consolidation of National Forest lands has advantages but should not be considered a desired condition in all cases, especially when consolidation of Forest Lands occurs at the expense of losing smaller dispersed tracts of lands that provide connectivity among and access to public lands.

Include language mandating that legal roads and trails be clearly marked, especially where they cross private property.

FW-STND-LSU-02 and 03: In the interest of public ownership and stewardship of public lands, we support these standards.

Add a standard: The Forest will maintain the smaller dispersed tracts of public land that provide connectivity among and access to public lands.

Add a standard: When private land owners request access to their property over public lands (the only route available) no more than the minimum standards and least impactful access shall be provided. This access will remain open to public use in the same way as the private use.

Title Claims and Encroachments per Appendix 3: The language here indicates a clear priority system. Actions undertaken per this direction should be supported by details regarding the priority of the issue; actions should NOT be taken on an ad hoc basis.

#### Land Acquisitions and Conveyances

Objectives: Only lands previously identified as suitable for exchange and/or desired for acquisition in Forest Planning and Management documents shall be considered for those purposes.

We request that the GMUG do a suitability analysis for land transactions as well as for timber. Suitability is a plan component (36 CFR 219.7(e)(1)(v)). Under the law (National Forest Management Act) and the planning rule (cited above), suitability only has to be determined for timber, but it can be done for any other land uses. This saves time when specific proposals surface - the agency can quickly determine whether the land in question is suitable for a transfer of ownership.

FW-STND-LSU-12: Add Language or Standard "These lands shall NOT be conveyed out of public ownership in the future."

FW-STND-LSU-13: Avoid conveyance of habitat or populations of sensitive species to private ownership.

FW-STND-LSU-14: Conveyances should, when appropriate, require the use of conservation easements and/or

deed restrictions to protect public resources such as flora and fauna, archaeological and paleontological and those with historic significance.

## Range

Appendix 3 includes a criterion for conveyance regarding "inefficient configurations"; this criterion should include direction for parcels that connect to public lands managed by other agencies to be conveyed to those agencies so as to maintain public ownership and stewardship.

Land conveyances: [GMUG Plan p. 150]

Bullet Point 3 should elaborate on "non-Forest Service purposes".

Add a bullet point with direction that exchanges should ensure that exchanged lands include similar resources and public values (i.e. riparian areas, habitat for sensitive species, similar recreation opportunities, etc.

FW-OBJ-RNG-03: Revise language to reflect the objective of having 100% of assigned improvements completed over the term of the lease.

#### Designated Trails

The Forest Service should stay in charge of approving new trails, doing trail development and performing trail management and maintenance.

FW-OBJ-DTRL-04: Add the language "as appropriate" to the objective of relocating the Divide Trail off roads so as to minimize impact to sensitive high alpine ecosystems and wildlife habitat.

Appendix 3: Identification of lands and opportunities to acquire lands and rights of way for the Continental Divide Trail should prioritize those opportunities which may be implemented through the expenditure of public resources, not through land exchanges.

#### Recreation

##### Desired Conditions

FW-DC-REC-01: The GMUG provides a variety of high-quality, year-round recreation opportunities across a range of resilient recreation settings. Protection of the natural systems, water quality, air quality, wildlife, vegetation, scenic quality and historic/cultural resources is the first priority to ensure a high-quality recreational user experience, and to contribute to the positive health and wellness effects of being in a natural untrammelled setting. Recreation opportunities and settings meet the needs of different user groups to the extent possible without impacting the above described resources. Use and users are managed to protect the natural resources. Unique cultural[hellip].

FW-DC-REC-02: As written[hellip] Add: Development for recreation is subordinate to the qualities of the natural landscape unless previously disturbed landscapes are being rehabilitated for recreational use.

##### Objectives

FE-OBJ-REC-03: [hellip] ensure access to portals to 14,000-ft peaks are managed to reduce ecological impacts, for example, create parking areas in less sensitive areas that may require longer trail walking distances. Use signs to indicate where parking is allowed and where it is not. Add to wilderness use guidelines to encourage 14-er hikers to carpool or ride share to the trailheads.



## Standards

FW-STND-REC-05: Motorized or mechanized travel shall occur on currently designated routes only. Any proposed additional motorized or mechanical travel routes shall be analyzed through an Environmental Assessment of Environmental Impact process prior to implementing such routes.

FW-STND-REC-06: When reviewing dispersed campsites that are resulting in unacceptable ecological impacts, protection of ecological resources should be the primary goal. Closing sites for rehabilitation is recommended. Further management may include designating specific sites and instituting a permit system.

FW-STND-REC-07: We support the suggested possible management actions. In addition, consider signs to educate visitors about avoiding impacts and continue to emphasize "Leave No Trace" behavior on ALL Forest lands.

## Scenery

### Desired Conditions

FW-DC-SCNY-01: ... High quality natural appearing scenery and scenic values persist in viewsheds from areas with high public use such as scenic byways and travel corridors, nationally designated trails and developed recreation sites. High quality natural appearing scenery and scenic values persist in viewsheds from all designated wilderness areas and hiking trails in Primitive and Semi-Primitive ROS settings.

### Objectives

FW-OBJ-SCNY-03: Add Objective: Extraction activities (and access to them) including timber harvest, utility corridors and sites, oil, gas and mining create unacceptable scenic impacts and shall not occur within the viewsheds described in FW-DC-SCNY-01, above. This applies to foreground, middle-ground and distant viewsheds.

## Timber and other Forest Products

FW-OBJ-TMBR-01: Annually offer 55,000 CCF of Forest Products - The specificity of this amount could force efforts to harvest forest products even under inappropriate circumstances; the objective could be changed to: [hellip]offer a maximum of 55,000 CCF (or the maximum amount in the current Plan, whichever is less), where appropriate and where there are no resulting negative consequences to natural resources

## Appendix 8: Timber Suitability Analysis

We are concerned about dropping the requirement that timber harvest be economically feasible; it may encourage harvesting in remote areas and steep terrain and have

adverse impacts on soil and riparian resources. Please keep that requirement in place. [GMUG Plan p. 175].

## MANAGEMENT AREAS

### DESIGNATED WILDERNESS

#### Desired Conditions

MA-DC-WLDN-01: As is. Add: Existing Wilderness Areas shall remain and be managed as Designated Wilderness in perpetuity.

#### Standards

MA-STND-WLDN-05: Change to: There shall be NO activities or occupancies unless they are expressly allowed in the Wilderness Act. Those allowed in the Wilderness Act shall be authorized by Special Use Permit [hellip] existing text starting (1) will follow[hellip].

### RECOMMENDED WILDERNESS

Include the following as recommended high quality wilderness per our personal observation and/or experience:

#### Area P7 - Mt Lamborn

Per the GMUG Plan this has a high degree of wilderness characteristics. Good addition to West Elk Wilderness

Include the southeast and north east areas as well.

#### Area P4-82 Beckwiths

Per the GMUG Plan there is a high degree of wilderness for the Beckwiths. This is an appropriate addition to the West Elk Wilderness.

#### Area P1-60 Electric Mountain

Increase rating from moderate to high degree of wilderness quality. It has a high degree of naturalness and scenery.

## GVP1-Flattops

This large 100,000-acre area was considered as one unit, and rated moderate. Within this unit, Chalk Mountain area (due to its ruggedness and difficulty of access) and part of the Elk Park area (important water source area including three branches of Hubbard Creek) should be considered for high wilderness characteristics.

## Area P3 - McClure Pass/Horse Ranch Park

Within this area, rated moderate, the Munsey-Ruby Stock trail would be appropriate for high quality wilderness. AS it gets higher, it is a narrow sliver between wilderness lands.

It would be appropriate to consolidate wilderness lands here and include the trail and Munsey Creek.

## P2 Clear Fork/Huntsman's Ridge

This area has been rated low. We suggest it be increased at least to moderate. There are outstanding views from Huntsman's Ridge and there is a large contiguous area of natural lands. It is important to protect the qualities of this area, especially as oil and gas extraction continues to impact the general area. Perhaps it could be a special management area?

## WILDERNESS AREAS TO BE ANALYSED

### Tabeguache and Roubideau Designated Areas

#### Desired Conditions and Standards

The Tabeguache and Roubideau areas are special protected areas that have outstanding natural values. They are surrounded by other lands that generally are open to a range of impacts from human use. Review the adjacent lands for suitability for allocating more protections to those lands' natural resources. Coordinate with the management of adjacent BLM lands.

#### High Use Recreation Areas

MA-OBJ-HIREC: Add an objective regarding the obtaining resources, human and other, necessary to enforce the rules necessary to meet the desired conditions and objectives in high use areas.

## MONITORING

We support and encourage monitoring activities. There should be additional funding to support wilderness rangers and monitoring staff. Continue to develop programs for partnering with non-profit organizations and volunteers to implement monitoring activities.

View of the Raggeds from Drift Creek Trail near McClure Pass

## CONCLUSION

Thank you for your time and consideration of our comments. We look forward to learning how they will be incorporated into the GMUG Forest Plan. Please feel free to contact us at [coloradowildpubliclands@gmail.com](mailto:coloradowildpubliclands@gmail.com) if there are any items you would like to discuss further.

Yours sincerely,

Suzanne Jackson (Staff) and the

Board of Directors of Colorado Wild Public Lands

Franz Froelicher, Jean Perry, James Katzenberger, Anne Rickenbaugh, Stefanie Davis and Hawk Greenway