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First name: Town

Last name: Mayor

Organization:

Title:

Comments: GMUG Working Draft Forest Plan Comments

July 27, 2019

Grand Mesa, Uncompahgre, and Gunnison National Forests

Attn: Plan Revision Team

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Delta, CO 81416

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Dear GMUG Planning Team,

Thank you for this opportunity to submit feedback on the Working Draft Plan of the Grand Mesa Uncompahgre Gunnison National Forest. We have been tracking the development of the plan at each stage and commend the Forest Service for the tremendous research and information-gathering effort that has gone into this latest Plan. We would like to provide our support for the comments and recommendations submitted by Sheep Mountain Alliance et al., and reaffirm our commitment to supporting wilderness protections for multiple lands in the GMUG and the specifically Ophir area.

First off, we would like to thank you for the closure of motorized use in the east end of the Ophir Valley in the winter ROS. As you know, Ophir is strongly committed to non-motorized use in the forestlands that surround the valley. As a community of 165 full time residents, the noise from snowmobiles roaring through our small valley has tremendous impacts to families and residents. Likewise, Ophir is known for large and dangerous avalanches. Last winter, the town was avalanched in for three-and-a-half days. Snowmobilers travel through significant avalanche terrain, and not only put themselves at risk, but at times, put themselves directly above other backcountry users on the same slope. Thus, closing that terrain to over-the-snow-motorized use ensures better safety for all users, including motorized.

With respect to the summer ROS we wish to emphasize our commitment to protecting the valley from excessive motorized use. In 2005, under the jurisdiction of US forest ranger Kathy Peckham, several gates were installed in the east end of the Ophir Valley, closing motorized use in Waterfall Canyon, Swamp Canyon, Carbanero and Chapman Gulch. The current map maintains the same designation of the lands on the north and south sides of the Ophir Pass road as "semi-primitive motorized," which is fine, however, we would like to ensure the commitment from the USFS that the four gates still in use remain locked, thereby closing those designated side roads to motorized use.

In our previous comment letter, submitted in December 2017, we noted our preference that the Ophir Needles be managed in a manner that protects the unique scenery of the area, but does not interfere with public enjoyment and recreation, particularly climbing. We found only a brief mention of the Ophir Needles and no further details on the SIA or proposed management in the working draft, and we would like to see further elucidation on this matter.

Since 2008, we have been included in the process of crafting the San Juan Mountains Wilderness Bill, whose

components have now been included in the Colorado Outdoor Recreation and Economy (CORE) Act. We have consistently supported these bills that protect local public lands, as they represent years of collaborative work and accommodate multiple user and stakeholder groups, as well as the interests of our community in particular. Not only do these places have tremendous value for their economic importance and ecosystem services, Ophir's residents rely on these lands to maintain the unique way of life in our small community, and we believe that wilderness and special management designations are the best tools for long-term protection of our future. Thank you for including all of the lands in the original San Juan Mountains Wilderness Bill for wilderness consideration.

However, besides these places, we also believe that there are many other local areas that are worthy of administrative designations such as wilderness study areas as the GMUG Forest Planning process moves forward. We support the Community Conservation Proposal, which represents a network of science-based, ground-truthed wildlands, whose wellbeing and protection supports the health of our own local lands and wildlife. Please refer to this proposal to see the areas that we support for protection.

In general, throughout the working draft, we believe that more specific standards are needed if forest resources and values are to be protected. In areas such as timber, wildlife, or watershed management, a lack of specificity with respect to how goals are to be achieved renders protections meaningless, and "adaptive management" is not an acceptable substitute for concrete standards. In addition, we would like to see the working draft take a more comprehensive view of climate change mitigation and adaptation, particularly when looking at timber values, and wildlife connectivity. There is little direction on climate change in general in the draft, and as a high-altitude community where the impacts of climate change are rapidly accelerating we believe this is a critical omission. Meanwhile, this draft dramatically expands the acreage to be considered for timber harvest and suggests that harvest could even happen in high-quality lynx habitat. Our local forest lands protect our water quality and quantity, as well as providing incredible habitat for a variety of wild species, and some mitigation of avalanche hazards in our very avalanche-prone valley.

Thank you for considering this feedback. The maps you provided are outstanding and offered a clear picture of proposed changes.

We sincerely thank you for listening and respecting the desires of the small community of Ophir, especially with the changes to the Winter ROS.

Please let us know if you need any further information on any of the areas mentioned. We look forward to working with the Forest Service throughout the Forest Planning process.

Respectfully,

Corinne Platt  
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