

Data Submitted (UTC 11): 7/29/2019 6:00:00 AM
First name: Chris
Last name: Anon
Organization:
Title:
Comments: Comments on Forest Plan Working Draft

Dear Forest Plan Revision Team,

Please see attached document for my comments on the Forest Plan Working Draft. Thank you for the opportunity to provide comments.

Sincerely,

Chris Jauhola

I appreciate the opportunity to comment on the working draft of the Forest Plan revision. I attended the public information session in Palisade and have the following comments to offer.

I found the use of the alpha-numeric system to identify management direction, objectives, standards and guidelines to be more confusing than helpful, particularly when referencing other sections of the document. I was forced to continually flip between sections of the document to try to understand the references. I suggest that this system is more appropriate for use in summary tables, rather than in the narrative portion of the document.

Thank you for clarifying the genetic similarity between the Greenback cutthroat trout, a Federally threatened species, and the green strain of the Colorado River cutthroat trout, a Forest Service sensitive species found on the Gunnison and Uncompahgre Forests. While this strain of cutthroat trout is found in several streams on these forests, only two populations, in the North Fork of Escalante Creek and in Kelso Creek, occupy more than 5 miles of habitat, the minimum amount thought to be needed for long-term persistence. These populations, in particular, deserve special protection.

Although the plan states that these populations will be protected as if they were formally listed as threatened under the ESA and identifies 8 watersheds where this cutthroat strain occurs as "Conservation watersheds", it provides no standards for protection of this unique strain of trout. The plan allows 5 years to write management plans for each watershed, but offers no specific interim protection while the plans are being written and then allows an additional 10 years for threat mitigation to occur. Of particular concern are potential threats from wildfire and prescribed fire - trout are highly sensitive to heat and ash which can eliminate an entire stream population. Other concerns include potential impacts from future logging activities and current OHV use within riparian areas and streambeds. Specific standards for protection are warranted, particularly until the watershed plans are completed.

I am also concerned about the lack of standards to protect the Gunnison sage grouse, a Federally threatened species. Although objectives and guidelines are provided, these are not mandatory and allow for exceptions and exemptions. With no enforcement specified, these guidelines, while maximizing management flexibility, may do little to protect this threatened species.

Finally, the Community Conservation Proposal offers recommendations to further protect some of the areas

where special status species occur. Of particular note, Kelso Mesa if managed as a wilderness or a roadless, primitive area with limited OHV use, would protect several miles of the best remaining habitat for the green-strain Colorado River cutthroat trout. The Uncompahgre Plateau presently has no designated wilderness or areas managed for their wilderness values. It is disappointing that the GMUG National Forest staff has chosen not to propose any new wilderness areas in the proposed revision of the Forest Plan. Lower elevation ecosystems are notably absent in the current wilderness system within Colorado. Kelso Mesa contributes poorly represented ecosystem types, protects high biodiversity values, and protects significant headwater streams containing green-strain Colorado River cutthroat trout.

The Kannah Creek watershed, a major source of municipal water for the city of Grand Junction, deserves additional protection from future ground disturbing activities including pipelines, roads, OHV trails and mineral development. I didn't find any special management protection proposals for this sensitive watershed with high biodiversity values beyond the general watershed objectives. This watershed should have mandatory management standards, not simply guidelines or objectives, that will protect water quality, biodiversity and its other unique values.

Sincerely,

Chris Jauhola