

Data Submitted (UTC 11): 7/29/2019 6:00:00 AM

First name: Doug

Last name: Tooley

Organization:

Title:

Comments: Re: Forest Plan Revision Working Draft Comments

Formatting may have been stripped from the previous submittal. The

attached PDF should be easier to read - headings are those of the

Draft Revision itself.

-Doug

FW-DC-SCEC-01: The provision of sustainable forest goods and services contributes to the social and economic well-being of local communities through critical clean water supplies, commodities (including timber, forage, and minerals), and ample and wide-ranging scenic and recreation opportunities, fostering robust industries (including tourism) and supporting local employment and income.

Forest service policy should maximize all responsible uses outside of critical wilderness areas. Responsible dispersed camping is discriminated against by, apparently, Forest Service wide discrimination.

A historical comparison of this period, the post Great Recession, to the Great Depression, is relevant. At that time Forest Service lands provided opportunities for displaced individuals through work camps on a variety of resource improvement projects.

Current progressive proposals for a Green New Deal go to this. The Forest Service is already negligent for not fostering minimal, obvious, opportunities for such use including opportunities presented directly to it. The discriminatory activities against dispersed camping evidence malicious intent at some level(s).

FW-DC-PA RT-01: Partnerships with Federal, state, county, and tribal agencies, universities, nongovernmental organizations, and private landowners are fostered

The failure of the establishment 'partnership' is clearly in evidence in spite of well controlled Media denial of same, as per the above. Commenter's experience in this regard document this up to the 10th Circuit Court of Appeals. This Forest, and Colorado in general should take a lead in this, correcting the excesses of the 9th Circuit Court of Appeals, not, as under former Governor John Hickenlooper and Senators Gardener and Bennet, pander to those abuses as part of a nationwide effort by the Texas based oil and gas industry to corrupt Democratic and Environmental values, not to mention the Constitution itself.

It can be argued that any corporate body not holding itself to the Constitution is NOT A PART OF THE UNITED STATES AND IS THEREFORE ENGAGING IN ACTIONABLE TREASON.

FW-DC-EDU-01: Educational and interpretive programs and activities enrich visitor experience and understanding of the natural resources on the Forests and their role in providing valued ecosystem services.

The importance of this cannot be understated. Further, connecting the human brain to nature improves its health and function. This process cannot be allowed to be corrupted.

FW-DC-AQ-01: The overall quality of the air contributes positively to human and ecosystem health, visibility, multiple uses, and wilderness values

The positive carbon impacts of a healthy forest should be quantified and opportunities for increasing same should be explicitly identified. Similarly, the carbon costs of controlled and uncontrolled burns should be measured.

It appears likely to me that trace air pollutants are impacting Forest Health and resiliency. Additional study funded nationally is needed, as is constituent/commenter education.

FW-DC-ECO-01: Ecosystems contain a mosaic of vegetation conditions, densities, and structures. This mosaic occurs at a variety of scales such as geographic and watershed scales, reflecting the disturbance regimes that naturally affect the area.

Human residency is a component of the ecosystem. IT IS CRITICAL THAT THE WILDLAND INTERFACE BE IDENTIFIED AND EXPLICITLY MAPPED AND MANAGED AS A DISTINCT

CLASS OF TRANSITIONAL ECOLOGICAL USE. Map categories 4.1, Mountain Resort and 4.2 High Use Recreation Area, are a component of this.

FW-OBJ-ECO-04: Within 10 years of plan approval, identify areas of potential climate refugia (Morelli et al. 2016) on the Forests and implement monitoring for a subset of these areas

This objective is too limited and not quick enough.

Specifically, the Wildland Urban Interface must be immediately addressed for Forest Health and Fire Safety. Forest health practices (Saul's Creek in the San Juan Forest is the most intensively managed area I'm aware of locally.) should be applied to these areas as well as the more developed areas of Mountain Resorts. The determination of refugia should be an element of Wilderness designation, with the practical realization that natural burning of these areas is a likely statistical result. Local Lynx populations should be monitored in these treated Wildland Urban Interface areas over a period of at least 5 years.

Additionally, the local human use of Forest Resources should be addressed and the carbon impacts identified. These uses include forestry products, small scale hydro, foraging, and possible renewal of market hunting with local processing. A study for the creation of a USDA meat processing plant for the West End (Norwood, Naturita, Nucla) is now underway.

Ski runs should be improved as habitat. Frequently these runs consist of mineral soil and improvement with biosolids should be considered. An initiative to locally produce biosolids and compost is now underway under San Miguel County Commissioner Kris Holstrom. Such a facility may require either Forest Service or BLM land. Native seed stock should be distributed.

Transitional zones (10-20') between Forest and Ski Run should be implemented where scientifically indicated, especially wetlands. Wetland within the boundaries of existing ski runs should be allowed to 're-wild' as much as possible. Given the history of wetlands violations with the Telski corporation and its 'partnerships' with local governmental agencies including our local hospital district this is crucial.

Given the need for forest health management Mountain Resorts these ecosystem improvements should be accomplished as a part of the clean up process. THIS CAN BE COMPLETED WITHIN TEN YEARS.

FW-DC-RMGD-01: Riparian management zones have the distribution of physical, chemical, and biological conditions appropriate to support their inherent resiliency to natural disturbances, human activities, and climate variability.

Flood risk from delayed snow pack melting into the Monsoonal period, as in 2019, should be studied. Additional USGS flow gauges are needed at higher altitudes, especially in the wildland interface. These gauges should be automatically connected to emergency alert systems.

FW-OBJ-RMGD-06: During each 10-year period following plan approval, restore or enhance at least 2,500 to 5,000 acres of riparian and meadow habitat,

These restored meadow and riparian areas should include Mountain Resorts, above these quantified goals.

Small scale hydro should be allowed within the prescribed Wildland Interface and some areas of Mountain Resorts. Construction of small scale storage for timing of power generation, power storage (uphill pumping), and Monsoonal Flash Flood mitigation should be considered. In the Telski Mountain Resort this development should occur below the Lift 5 area and continue to the Valley Floor through the Wildland Urban Interface. Wetland sensitive trails (post and beam boardwalks) should be built above or adjacent to associated pipelines.

Although I don't put high priority on road decommissioning places where the road, or ski run, has impacted a riparian area should be prominently identified and studied.

FW-STND-RMGD-07: Riparian management zones (Figure 4, Figure 5) shall be delineated as follows:

Larger rivers should have bigger riparian management zones. At first review I cannot identify specific areas under Forest Service Jurisdiction nor have the expertise to relate size and adjacent topography to that management zone.

Likely it should exceed current 100 year flood zones. Establishing these principles is important as they apply to the fiduciary responsible management of lower elevation riparian zones post climate change related flood events.

FW-STND-RMGD-08: To maintain or restore riparian ecosystem integrity, in the riparian management zone allow only those actions that maintain or improve long- term stream health and riparian ecosystem conditions, as consistent with the Watershed Conservation Practices Handbook (R2 FSH 2509.25 and FS 990A or equivalent direction).

Within the Wildland Urban Interface wetland and riparian zone incursions shall be allowed on a minimal basis when regulated (post and beam construction), replaced, or otherwise mitigated.

Abuse of such procedures should be criminally prosecuted. HISTORICAL ABUSES, SUCH AS MINING, NEED TO BE PROSECUTED ALONG WITH ASSET FOREFEITURE.

FW-GDL-RMGD-14: To maintain the structure and function of riparian management zones, firelines should be located and configured to minimize sediment delivery and limit the creation of new stream channels.

This seems like a undue regulatory burden on firefighting resources. Erosion does occur naturally and a well managed Forest should reduce the incidence of that allowing for fire fighting associated impacts. Restoration post fire is of course essential to avoid ongoing problems.

FW-STND-AQTC-05: Cooperate with Federal, State, Tribal, local governments and other stakeholders to identify and secure environmental flows needed to maintain riparian resources, channel conditions, and aquatic habitat.

RISKS FROM CONSUMING CONTAMINATED FISH NEED TO BE BROADLY DISCLOSED AS A MATTER OF

## PUBLIC HEALTH.

FW-OBJ-IVSP-02: Annually, invasive species management actions are employed on 10 to 20% of inventoried acres so that: new infestations are prevented; densities of existing infestations are reduced; total acres or areas infested are reduced; infested areas are restored/rehabilitated; existing infestations are contained, controlled, suppressed, or eradicated depending on infestation characteristics (size, density, species, location, etc.), management opportunities, and resource values at risk; and uninfested areas are maintained and/or protected.

Costs of invasive species removal can easily exceed benefits, especially in the context of competing needs. Invasive species removal does seem like an obvious component of a Green New Deal and/or long term (greater than 14 day) dispersed camping permission consistent with resource use residential rules.

FW-DC-FFM-03: Wildland fires are actively and successfully suppressed where necessary to protect life, investments, and valuable resources. Wildland fires in the protection emphasis areas, particularly in the WUI and near infrastructure values

This is critical. I believe these treatments also go to beetle infestation and general forest resiliency. These areas should be specifically identified on the map. A one mile zone buffer to the WUI seems like a good minimum, subject to review. At first glance I'd also include:

1. Areas adjacent to roads where the cost of treatment is lower, as well as the cost of science considering Lynx Habitat.
2. Large portions of Mountain Resort areas, exempting some - such as perhaps the Prospect Creek Basin above the Lift 5 access road. Easier to access areas should be given priority and also locally studied.
3. Areas of high risk of spreading wildfire to the WUI, such as areas in the San Miguel Canyon between residential areas on Hasting and Wilson Mesas that might exceed the one mile buffer zone.
4. Motorized recreational access areas and some high use recreation areas.
5. Utility infrastructure.

FW-DC-SPEC-01: Human disturbance to wildlife and fish is minimized at a scale that impacts vital functions of their life history (breeding, feeding and rearing young) with a goal of ensuring persistence of the species

I support Lynx habitat concerns. Connectivity, especially via riparian corridors is crucial. I question the barrier of entry of dogs except in the case of calving and breeding. Canine predators are a part of the ecological history of the forest and considering their removal the addition of domestic species may actually help maintain that evolutionary balance point, absent endangered status. Leash requirements should be on the palette of regulatory response. Companion animals should be added to the service animal category, as it is in housing including USDA Rural Development and HUD.

FW-DC-SPEC-14: Relatively undisturbed areas provide habitat blocks that function as security areas for populations of big game and other species.

Deer and Elk should be considered as a local food resource extending beyond current hunting practice.

FW-STND-SPEC-20: To maintain population viability, ground-disturbing activities (i.e., oil and gas development, new roads, etc.) shall not be authorized on Gunnison's prairie dog colonies.

The Telluride Valley Floor saw a colony collapse winter of 2018/2019. Anecdotally I have heard reasonable credible reports of dandelion populations in this same area and the disappearance of Magpies in an adjacent residential neighborhood. Can this be investigated?

FW-STND-SOIL-02: Vegetation management activities shall not create detrimental soil conditions, including loss of ground cover, severely burned soils, detrimental soil displacement, erosion or compaction, on more than 15 percent of an activity area. In activity areas where less than 15 percent detrimental soil conditions exist from prior activities, the cumulative detrimental effect of the current condition and proposed activity must not exceed 15 percent following project implementation and restoration.

The 15% number seems high, especially given no criteria for boundary designation. A specific size of disturbance standard should be set, allowing for such uses as roads, trails, and utility infrastructure. Ski runs, such as on the Telluride Ski Resort, should be restored.

FW-DC-WTR-02: The Forest Service and stakeholders actively coordinate in sustaining ecological and hydrologic processes to continue to provide critical water supplies to communities and water users.

Small scale hydro should be allowed in the WUI, Mountain Resort, and High Use Recreation areas. Minimum flow standards should be set for these smaller streams (Commenter is not knowledgeable on the status of this science.) Trail construction associated with pipeline development should be encouraged. The feasibility of small storage systems for peak period release, power storage (uphill pumping - possibly utilizing Mountain Resort snow making pump capacity), and Monsoonal flash flood mitigation should be considered.

FW-STND-WTR-05: Projects, including those in the riparian management zone and involving rangeland infrastructure, and all roads, including temporary roads, will comply with Watershed Conservation Practices Handbook (R2 FSH 2509.25 and FS 990A or equivalent direction). See also Transportation, Riparian Management Zone, and Range sections.

Real time USGS flow monitoring stations should be established in WUI zones, and permitted in streams considered for small scale hydro development.

FW-OBJ-CHR-02: Within 5 years of plan approval, areas of Tribal importance, including discrete cultural landscapes, are spatially identified based on cultural affiliation, time period, and/or relationship with natural resources and features.

Joint management of historical native lands is crucial, along the lines (and in collaboration with the people) of the Bears Ears National Monument. This should apply to the BLM as well.

Native place names should be used in consultation with Ute Tribes and national specific expertise such as the Colorado Plateau Foundation. English translation of native names should be desirable in some situations. The Telluride Valley Floor should be restored to its Native name and if one cannot be historically identified then tribal officials should be given the option of choosing a name of their own - so long as it is reasonably accessible to speakers of English. Renaming of natural places should be allowed, especially when the associated anglo name carries some sort of malicious connotation. Historical settlement names should also be considered.

FW-OBJ-CHR-04: Within 5 years of plan approval, identify and map populations of Osha (*Ligusticum porteri*) for Tribes

This policy should be included in a minimal foraging resource management plan including also Bolete and Chanterelle mushrooms and Arnica. This plan should include resource protection and foraging permit reporting.

Limiting commercial use to Tribes should not be ruled out.

FW-DC-ENMI-01: Abandoned and inactive mines disturbed by past mineral exploration and mine development have been returned to stable conditions and an appropriate, functioning, vegetative state, and do not pose health, safety, or environmental hazards.

This historical process has been institutionally corrupted in the State of Colorado, to the point of infecting virtually every aspect of land use law in Colorado including the absence of responsible growth management practice. The case of the Gold King Mine disaster, formerly under the ownership of the Idarado Mining Company (now Newmont) in the adjacent San Juan National Forest is a case in point.

Commenter's experience with Hays Griswold in June 2015 (just prior to the Gold King) at a San Miguel County Commissioner's meeting considering similar 'emergency' remediations as a cost saving component of rehabilitation settlements on the Caribou and Carbinero Mines (both under partial jurisdiction of the Forest Service) goes to this. Griswold acted in a harassing and menacing fashion toward commenter in response to the proposing of citizen responsive feedback mechanisms - directly interfering with constitutional due process among other things.

The association of the Idarado Mining company, through their agent, Attorney Tom Kennedy, acting in conflict of interest on a Mountain Village Wetland permit, goes to the pervasiveness and insidiousness of these malicious practices.

Through circumstantial evidence it appears that then Governor Hickenlooper and Senators Gardener and Bennet were involved in a bi-partisan effort to authorize the unsafe practices of the Gold King Mine remediation as well as the subsequent follow-up - including ongoing assaults on the commenter.

Although it is the case that this contaminated water release is not particularly historically significant given past practice that is not an excuse for those historical practices or the Federal endorsement of those corrupted State and Local procedures.

Norwood District manager Matt Zumstein's lack of response to these concerns in the Caribou and Carbinero undermines his credibility to handle any public land matter. His misdemeanor attitude toward the commenter in management of the Mary E. campground also goes to this.

These practices reflect a national malicious problem most apparent post the 2008 'Too big to fail' recession.



Dispersed camping discrimination and the lack of any preliminary 'Green New Deal' proposals are perhaps the most significant of these impacts.

That said, mining should not be ruled out completely in the GMUG - especially in times of legitimate war. However historical bad actors should be banned from all activity with any remaining residual activity placed under the ownership of the current workforce.

The Uncompahgre Plateau does seem possibly compatible for mining use.

Coal mining should be immediately stopped, absent that fees approximating a rational carbon tax should be imposed.

Oil development should be discouraged with an associated carbon tax fee structure.

Natural gas development should be allowed in suitable non-wilderness areas outside the WUI and a proportional carbon tax allowed.

Geothermal should be encouraged.

Solar development in the Wildland Urban Interface should be considered, such as on south facing slopes.

Ridgetop wind facilities should be considered with sites possibly added to the Wildland Urban Interface.

Hydroelectric is supported and addressed elsewhere in these comments.

FW-STND-TSTN-03: All temporary roads will be closed and rehabilitated within 2 years following completion of the use of the road, which involves re-contouring where significant side slope exists, elimination of ditches and other structures, out-sloping during construction, removal of ruts and berms, removal of culverts or other instream structures and associated fills, effectively blocking the road to normal vehicular traffic where feasible, and construction of drainage features such as cross ditches and water bars.

Although I am in support of road closure this policy seems to be excessive. Such assets have potential future use, such as forest health treatments and fire protection. They also should be usable as recreational routes, including motorized.

One particular beef I have is the closure of routes to soon. The first 300' of such routes should be preserved if there are dispersed camping possibilities along that stretch.

FW-DC-LSU-01: National Forest System lands are consolidated, providing reasonable access and efficiency of land management while protecting resource values. All National Forest System roads and trails that access the Forest or cross private inholdings have legal access or a documented right-of-way, and boundary lines and property corners are easily locatable.

Commenter is aware of abuses of these access rights by adjacent property owners, but not local specifics. This is an instance of a substantial problem of the abuse of public lands and resources by private interests for their own benefit and the exclusion of the public. One of the most direct classes of this major problem is the rule making closure of dispersed camping areas in lieu of competent enforcement.

FW-STND-LSU-08: To maximize public benefit of the special use program, special use requests shall be addressed according to the following priorities (in order of priority):

Motorized use should be allowed as a special use. My first glance response to current motorized access proposal is that most of these areas should have restricted permitted access as is does on recreational river assets at a level set to encourage enjoyable multiple recreational use - with allowable special use event permits for limited time periods.

FW-STND-LSU-12: Newly acquired lands shall be assigned a management area consistent with existing, adjacent management areas.

Transfer of small portions of public land for in perpetuity deed restricted affordable housing remaining in private or public ownership should be allowed. Current Federal rule allows the conveyance of up to 5 acres of land to Religious and Educational Institutions at the discretion of the Forest Supervisor. These procedures should be further developed, including ample public input, and non- profit housing added as a specific option.

At first glance any property within the WUI should be eligible for consideration.

FW-DC-RNG-01: Livestock grazing and its associated activities occur on National Forest System lands. These activities contribute to the stability and social, economic, and cultural aspects of rural communities while maintaining or achieving desired ecological conditions. See Native Species Diversity FW-DC SPEC-02 and Socioeconomics FW-DC-SCEC-01.

Hypothetically, If Deer and Elk were to become commercialized carbon reducing food sources their substitution for Beef becomes possible. As such, and if market prices dictate, Ranchers should have the option of converting some of their licensed and permitted range to game production.

FW-OBJ-REC-03: Within 10 years of plan approval, ensure access portals (e.g., trails, parking lots, and trailheads) to 14,000-foot peaks include adequate facilities to mitigate ecological impacts associated with increasing use.

Two night camping should be allowed at all trailheads, such as pre and post a hiking trip. Breaking down of camps between 10:00a and 5:00p should be required.

FW-OBJ-REC-04: Annually, maintain 500 miles of Forest Service trails, prioritizing those in the high-use recreation areas (MA 4.2).

Create a standing mechanism for user suggested trails including permitting for construction if the desire and capability exists.

Ensure the integrity of, and access to, historical trails in Mountain Resort and adjacent High Use areas. Five examples from the Telluride and the TelSki resort.:

1. TelSki is currently establishing a fee based bike park expanding the paid access winter model to the summer season. The particular presentation of the fee structure, including the 'donation' for historical trail access is such that one would believe a full pay pass option is required. These trails, including Prospect and especially Village, have been maintained for a bike use priority, including a modification of 'Yield to Rules' as understood by this

commenter. Most of these are on TelSki property, but the Prospect Trail has several on what I understand to be Forest Service Property.

This sign appears to be a official Forest Service posting due the Stake material.

Trail maintenance, who ever is doing it, has been biased to bike use, most notably at switch backs which can be difficult to traverse for some. Additionally, bike trail widening would be appropriate on the High Use Village Trail.

Conflicts on this trail are consistent with Mountain Biker attitudes, Millenials, and also inappropriately support the corporate attitude of TelSki Real Estate.

2. The below 'authorized access' sign is on the little used Sheridan route, there is also one on the highly used Village Trail right at the Telluride Gondola Station.

3. Similarly, Gondola Ridge station trail access with skis was blocked at the Memorial Day reopening with out legal justification, per my research.

4. Hiking on ski runs should be explicitly permitted outside of existing proposed bike park.

5. Similar to the TelSki access issues Mountain Village Mayor Laila Benitez attempted to obstruct, on a fraudulent legal argument, the use of a public transit system to access the Bridal Veil Falls area - the high

Country most accessible to nearby Telluride. BRIDAL VEIL FALLS SHOULD HAVE FOREST SERVICE SUBSIDIZED ACCESS ALONG THE LINES OF THE RFTA ACCESS TO THE MAROON BELLS NEAR ASPEN.

FW-STND-REC-05: Motorized and mechanized use shall be restricted to designated system routes. Motorized and mechanized travel includes, but is not limited to, travel by bicycles, electric-assist bicycles, mountain bikes, unicycles, tricycles, skateboards, and mountain boards.

This policy needs to be more explicit re: motorized and mechanized use class. The omission of 4x4 and ATV from this list is telling.

I suggest permitting on the majority of motorized access routes as is done with rafting on river routes, so as to create a level of use that does not disturb non- motorized use excessively. Electric Bikes and ATV's should be exempted from this permit requirement. Special use permits should be allowed for these areas for limited time periods. Electric bikes should be allowed on mechanized bike routes.

FW-STND-REC-06: Designate or otherwise manage (i.e., harden for more long- term, concentrated use; temporarily close and rehabilitate; institute a permit system; prohibit camping via closure order, etc.) dispersed campsites when use levels result in unacceptable ecological impacts.

THIS POLICY IS USING AN ECOLOGICAL RATIONALIZATION TO DISCRIMINATE AGAINST DISPERSED CAMPING USERS CONSISTENT WITH OTHER PRIVATE PUBLIC ABUSES DOCUMENTED IN THIS SUBMITTAL. IN ADDITION TO THIS APPROPRIATE RESOURCE MANAGEMENT IS NOT BEING DONE, NOR ARE REGULATIONS ENFORCED CREATING A MORAL HAZARD SITUATION WHERE POOR LEADERSHIP LEADS TO A RATIONALIZATION FOR ABUSE OF A POPULATION MANY OF WHOM ARE VULNERABLE.

It seems that existing camps in riparian zones should be grandfathered in unless intermittent wetland conditions exist.

Responsible dispersed camping is no greater nor no less than any other multiple use. This policy, and practice, needs a lot of work. The maliciousness of the Federal legal officials is noted.

FW-STND-REC-07: Institute responsive management actions in day-use areas when unacceptable ecological

impacts and/or unsustainable use levels occur.

The previously mentioned Bridal Veil access issue also applies to this item, driver safety mandates a shuttle system and restrooms.

FW-GDL-REC-08: To reduce ecological impacts, the Forests shall prohibit building, maintaining, attending, or using a campfire within the riparian management zone.

Existing fire rings should be inventoried and allowed unless otherwise indicated, such as transient wetland conditions.

FW-GDL-REC-09: To prevent the creation of unauthorized routes, particularly within 100 feet of water, build natural-appearing barriers that discourage passage when unauthorized routes are created.

This policy should not be construed to prevent lawful dispersed camping within 300' of existing roads. No new access routes should be created within riparian zones.

FW-GDL-REC-11: To ensure public safety, prevent wildlife habituation, and minimize encounters between wildlife and humans, the Forests should require bear-resistant containers (certified through the Interagency Grizzly Bear Committee)

Is this necessary? We don't have a grizzly population here. I've done substantial camping in the area, mostly in the San Juan National Forest just to the South and have never had a bear in my relatively clean camp.

FW-DC-SCNY-01: The Forests reflect a range of scenic quality sustained by a diverse and resilient landscape.

Alternative power systems should be allowed to impact natural scenic values in Wildland Urban Interface areas including solar, wind, geothermal and small scale hydroelectric. Land use architects should be engaged to ensure the design is compatible with the natural environment and a public design review process initiated.

FW-DC-SBWY-01: The intrinsic scenic, natural, historical, cultural, archaeological, and recreational qualities for which the scenic byways were designated are maintained or improved and showcased through exhibits, signs, and programs, connecting visitors to attractive and accessible natural landscapes, and contributing to recreation tourism and local economies.

Backroad, gravel, scenic by-ways should be considered. Montrose to Norwood/Naturita/Nucla and Norwood to Dolores come to mind as two routes with enhanced recreational opportunities.

FW-OBJ-TMBR-01: Annually, offer 55,000 CCF of forest products, including sawtimber, fuelwood, and other products.

On its face this number means nothing to me. Sustainable logging is good, but these standards don't appear to have any teeth, or detail. Insect and disease kill interacts with fire suppression and that too could be better delineated. Scenic impacts on paved by-ways should be prevented.

FW-STND-TMBR-08: Clearcutting may be used where it has been determined by the responsible official in the project record to be the optimum method. Other types of even-aged harvest shall be used only where determined by the responsible official in the project record to be appropriate.

There is a large continuum of practice between clearcuts and thinning based forest health practices. This could be better articulated, including the likely economics of various non-clear cutting alternatives. I favor non-clear cutting approaches, especially in the WUI.

FW-DC-UC-01: Utility corridors encompass and concentrate existing and potential future utility corridors for aerial and underground electric and communications utilities, including fiber optic lines; oil and gas transmission pipelines; water pipelines greater than 12" diameter; trans-mountain water diversion systems (excluding reservoirs).

Alternative energy development should be addressed in this section. Trans- mountain diversion systems moving Western Slope water to the Front Range should be prohibited.

FW-GDL-UC-04: To minimize the acres encumbered and associated environmental and scenic impacts, fiber optic lines and broadband infrastructure should be paralleled with existing utilities.

Trail and road co-location should be encouraged, even if reasonable additional distance is added. These facilities should be located with the WUI whenever possible.

FW-STND-WSR-04: Management actions within the river corridors of eligible river segments shall be consistent with management direction contained in FSH 1909.12, Chapter 80, Section 84, FSM 2354, or other current direction.

Mine based contamination needs to be resolved, at least to the extent of the assets of the ownership entity. If maliciousness exists Federal Criminal prosecution should be executed.

MA-DC-MTR-01: Mountain resorts on the GMUG primarily provide for skiing and other snow sports, and may also provide for other seasonal or year-round natural-resource-based recreational activities (e.g., hiking, mountain biking, and sight-seeing). Recreation opportunities are managed for large numbers of visitors in developed settings.

Insure ample public involvement in all planning and regulatory action. Protect historical uses and full hiker and equestrian access. Encourage consistent management from adjoining non-forest service jurisdictions.

Education on responsible public land/resource usage should be embedded in all actions.

Clearly delineate public and private uses.

MA-STND-MTR-05: Snow management, including snowmaking and snow- farming, shall be conducted in a manner that prevents slope failures and gully erosion, as well as bank erosion and sediment damage in receiving channels.

What are the consequences of this erosion - both environmental and legal to the operator? I am aware of two



locations on the TelSki ski resort where this occurring.

MA-GDL-MTR-09: To maintain a relatively natural-appearing setting, motorized travel within permitted boundaries is generally limited to administrative or emergency purposes

Electric bikes and ATVs should be considered for inclusion.

MA-GDL-MTR-13: To control trail density and minimize impacts to soils and water resources associated with trail use and development, trail density (e.g., foot or mechanized) should not exceed 2.5 miles of trails per square mile (or current research guideline) within each operational boundary.

At first glance this appears arbitrary. Trails on ski runs should be allowed and hiker/horse access allowed. Bike trails in for pay developments should not impede hiker or horse travel except in limited areas.

MA-DC-HIREC-01: High-Use Recreation Areas are places of focused public visitation that provide accessible, high quality, and diverse recreation opportunities that are generally located near improved roads

Maximum responsible public use should be planned for in these areas. Private benefit limiting use, direct or indirect, rationalized by demand should be prosecuted.

Bridal Veil should be added to these priority areas.

Policy overlap with the WUI and Mountain Resort areas should be further considered.

Transitioning dispersed camping areas to fee based is acceptable. Other management techniques should be considered. Absent extenuating circumstances existing riparian campsites should be protected. (I'd also like to see documentation of this being a problem.)

MA-GDL-HIREC-03: To improve recreational experiences and curtail natural resource impacts, management controls should be implemented and adjusted based on changing environmental conditions, visitation patterns, and use types.

Denser dispersed camping options should be considered. RESTROOMS!

MA-GDL-HIREC-04: To protect infrastructure, mitigate natural resource damage, provide for public safety, and maintain positive visitor experiences, implement controls such as limiting modes of transportation on certain routes

Mountain Biker - Hiker conflict should be specifically monitored. Safety and responsibility education should be provided to Mountain Bike users. Wider trail construction allowing safer passing should be encouraged.