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Grand Mesa, Uncompahgre, and Gunnison National Forests

Attn: Plan Revision Team

2250 South Main Street

Delta, CO 81416

October 12th, 2021

Dear GMUG Planning Team,

Thank you for this opportunity to submit comments on the Draft Plan of the Grand Mesa, Uncompahgre, and Gunnison National Forests Plan Revision. The GMUG National Forests are an important piece of the landscape surrounding the Town of Paonia, and the future of our town is tied closely to the future of our National Forests.

The Paonia Board of Trustees supports the Community Conservation Proposal. The Community Conservation Proposal is based on community involvement, on-the-ground fieldwork, the best available science, and the requirements in the 2012 U.S. Forest Service Planning Rule. These landscape-level conservation recommendations are integral to sustaining a healthy and wild GMUG now and into the future. The areas recommended by the Community Conservation Proposal in and around the North Fork of the Gunnison River watershed must be included in the final plan for the GMUG National Forest.

Specifically, we wish to endorse the inclusion of the areas included in the Community Conservation Proposal located within the North Fork Valley Watershed - the Electric Mountain, Elk Park, Coal Mountain, Mendicant Ridge, and Chalk Mountain Recommended Wilderness

Areas, Currant Creek, Priest Mountain, Flattops, and Turner Creek Special Management Areas, the Pilot Knob Backcountry Wildlife Conservation Area, the Muddy Country Watershed and Wildlife Conservation Area, and the Mule Park Important Bird Area.

Additionally, the town of Paonia requests additional changes to the draft plan in order to adequately protect wildlife, water resources, and Wilderness:

[bull] Plan Components

o We understand why the Forest Service would like to build some flexibility in the plan to allow for adaptive management when confronting changing conditions.

However, the public needs some level of management certainty to understand how the plan direction will affect natural resources. For example, the plan needs additional strong standards and guidelines to restrict threats to threatened and endangered species and species of conservation concern.

[bull] Wildlife Management Areas

o We strongly support the concept of Wildlife Management Areas (WMAs) in the revised forest plan and ask that those be retained and strengthened with additional plan components. This important management area designation could help protect habitats for a variety of wildlife species, and help ensure that hunting and wildlife-viewing remain an integral part of Paonia's economy going forward ..

o However, in places where Alternative D's wilderness and SMA recommendations overlap with the WMA-base identified in Alternative B, we support the stronger management prescriptions that Alternative D's wilderness and SMA areas provide.

o An additional component for WMAs is needed to ensure retention of security habitat for big game. We recommend a standard or guideline that requires or encourages maintenance of habitat blocks at least 500 acres in size having no

roads or other human intrusions in big game habitat in all areas assigned to this management area.

o Areas assigned to this WMA designation that are well below the one mile per square mile route density threshold should be kept that way. i.e., new routes should generally not be allowed in these areas for non-emergency uses, as the blocks with the lowest road densities likely provide the most secure wildlife habitat. A guideline should be added to retain the areas within this MA having lower route densities.

o MA-STND-WLDF-02, limiting open motorized and non-motorized route density to one mile per square mile, is good, but as currently written, this standard only applies to non-administrative system routes. Even though "new permanent roads are not currently being created for timber management activities" (DEIS at 393), this standard would not protect wildlife from the temporary roads typically created during timber sales. Such roads, though officially not open to public use, can attract motorized users. These roads are often not posted as being closed and do not appear on motor vehicle use maps. Therefore, this MA needs direction, preferably a standard, to minimize creation of temporary roads and close and obliterate all temporary roads as soon as possible after completion of management activities, unless the environmental documentation for the project shows a need to add any of these roads to the system as roads or trails.

#### [bull] Timber Suitability

o Every alternative in the draft plan posits a significant increase in suitable timber, which is a designation that interferes with the consideration of responsible management of the forests for uses other than timber production. The draft plan's analysis of timber suitability does not comply with the National Forest

Management Act, the Planning Rule, or the Forest Service policy. It seems designed to maximize the possibility of future timber harvest, even though the GMUG National Forest is much more valuable for conserving biological diversity and recreation than it ever could be for timber production.

o Finding suitable those lands that cannot be harvested economically, or in some cases, that cannot be harvested at all during the life of the revised plan, leads to artificially inflated calculations for sustained yield limit, projected timber sale quantity (PTSQ), and projected wood sale quality (PWSQ). It misleads the timber industry and the public, as well as present and future agency staff, about how much timber can or should be cut on the GMUG. It could lead to lands with trees actually suitable for timber production being overcut to meet an inflated PTSQ or PWSQ that was based in large part on thousands of acres of lands that cannot be harvested during the life of the plan and likely long afterward.

o Steep slopes should not be found suitable.

o Lands uneconomical to harvest should not be found suitable.

#### [bull] Water Resources

o Riparian management zones (RMZ), STND-RMGH-07, need to be strengthened.

The minimum width should include wetlands less than one-quarter acre. It is likely that a considerable portion of the wetlands on the GMUG is smaller than a one-quarter acre, even within the 100-foot minimum RMZ.

#### [bull] Wild and Scenic Eligibility

o We support eligibility findings for all the stream segments included in the draft revised forest plan. At the same time, there are several streams that were previously found eligible but have been left out of the revised draft forest plan, and those should be included, including Ruby Fork of Anthracite Creek and Deep Creek, which both originate from the Erickson Springs trailhead

Our town is able to thrive in no small part due to the natural resources provided by the National Forests that surround us. Our National Forests provide domestic and agricultural water to our farms and orchards, wildlife habitats that bring in hunting and fishing tourism, as well as grazing pastures that hold up local ranching economies. Designating the landscapes mentioned above would favorably impact the town and protect our way of life.

The Town of Paonia Town Council requests that the GMUG planning team incorporate the above recommendations in your draft plan and alternatives moving forward in the revision process. Thank you for your consideration of the Paonia Town Council's comments.

behalf of the Paonia Board of Trustees,

Mary Bachran

Mayor, Town of Paonia

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