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Organization:

Title:

Comments: Thank you for the opportunity to comment on the draft GMUG Forest Plan. My comments are attached.

[ATTACHMENT FOLLOWS. PDF CONVERSION MAY RESULT IN ERRORS.]

I support the Wilderness and special management area (SMA) recommendations in Alternative D. Wilderness areas in Alternative D align with recommendations from the Gunnison Public Lands Initiative (GPLI). The GPLI was a community-driven, consensus-based effort which reflects the desires of multiple, diverse stakeholder groups. Alternative D incorporates input from these stakeholders, whereas the other alternatives do not.

As shown in the DEIS, Volume 1, Table 3, only Alternative D addresses citizen proposals for SMA's. The citizen proposals for SMA's were endorsed by Gunnison, San Miguel, and Ouray counties. Alternatives A, B and C do not acknowledge these citizen proposals.

Statements made in the draft plan (pg. 7-8) indicate the need for SMA's; [GMUG] lands provide large backcountry habitats essential for maintaining several rare, threatened, and endangered species, and a wide variety of fish, wildlife, and other species, sustaining biodiversity in an increasingly populated region. In addition to their own intrinsic value, these ecosystems also support critical services... the continued provision of which necessitates managing and maintaining their structure, function, and composition... Ecological sustainability is the foundation of the plan. Alternative D best provides for managing and maintaining ecological sustainability through the provision of SMA's.

I support Wildlife Management Areas (WMAs) and the recommendations for those areas in Alternative D. I believe the designation of areas as WMA's will help protect wildlife habitat and support the protection of big game. However, where the WMA's identified in Alternative B overlap with the Wilderness and SMA's identified in Alternative D, I support managing those areas as Wilderness or SMA's as proposed in Alternative D.

Alternative D appears to provide the most protection for wildlife, including big game habitat. Per the DEIS, [Alternative D would likely provide the most connectivity benefit due to providing the greatest extent of recommended wilderness, special management areas, and wildlife management area categories...]. The addition of a management standard for WMA's is needed to preserve large blocks of diverse habitat. The addition of a management standard for WMAs is needed to support the desired condition for Wildlife Management Areas, MA-DC-WLDF-01; [Large blocks of diverse habitat are relatively undisturbed by routes, providing security for the life history, distribution, and movement of many species, including big-game species...]. The management standard should ensure large blocks (500 acres or more) of game habitat are protected from development of any roads or trails and any other human encroachment in WMA's. This is critically important for maintaining wildlife habitat, especially for big game.

I support significantly reducing the size of the suitable timber base.

Every alternative in the draft plan recommends a significant increase in acreage designated as suitable for timber harvest. Due to the probability of adverse impacts to watershed health, biological diversity, and wildlife habitat, I oppose any increase in the size of the suitable timber base. The DEIS states that [Expansion of the road and trail network, including temporary roads, represents the largest potential impact to watershed resources] and that [The primary expansion potential for temporary roads comes from projected timber harvest.] Temporary roads for timber harvest fragment wildlife habitat. Timber harvest should not occur in remote areas or on steep terrain because it could adversely impact soil and riparian resources. The draft plan includes some areas designated as suitable for timber harvest in critical Gunnison Sage Grouse habitat.

Gunnison Sage Grouse habitat areas should never be considered for timber harvest.

I support adding stream segments as eligible for Wild & Scenic

I support adding streams that were previously found eligible but have been left out of the revised draft forest plan; Taylor River, Slate River, Daisy Creek (Poverty Gulch), Escalante Creek, Bear Creek, Bridal Veil Creek, and Ingram Falls. In addition, some streams which were not previously studied for Wild & Scenic eligibility should be evaluated and determined to be eligible. These include Cement Creek, Upper Brush Creek, and West Brush Creek tributary.