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Organization:

Title:

Comments: Thank you for the opportunity to comment on the draft plan. Please find my attached comments.

[ATTACHMENT FOLLOWS.]

Thank you for the opportunity to comment on the GMUG Forest Plan (plan). My overall assessment of the plan is that it does not adequately consider the effects of overall forest health as it relates to climate change and associated extreme weather events that are here and coming. This part of Western Colorado is already the hottest spot in the US lower 48 states, with an increase of 2 degrees C. The extended drought, increased temperatures at all elevations, water shortages, and unprecedented weather events all indicate that more and different approaches to forest management must be taken. I encourage you to have the courage and insight to re-examine the direction you have developed with climate change as the primary issue you are responding to and make the real changes that are needed. Better integration of the different parts of the plan will also provide better actionability.

The following comments/potential additions respond to the forest plan direction as currently written and are shown in italics:

Desired Conditions: FW-DC-EDU-01: Educational and interpretive programs and activities enrich visitor experience and understanding of the natural resources in the national forests and their role in providing valued ecosystem services. ' SUGGESTED NEW "Leave no Trace," "Tread Lightly," fire prevention, wildlife awareness (such as lead reduction, Be Bear Aware, Animal Inn, etc.) and archaeological resource protection principles are promoted and practiced by the visiting public."] These programs connect people to the natural environment and foster a sense of place and shared stewardship.

[SUGGESTED NEW "Guidelines FW-GDL-RMGD-16: Projects and activities should b desired and implemented to maintain or improve soil and riparian function; maintain or improve native vegetation; and/or prevent the introduction or spread of disease, invasive or undesirable species."]

Guidelines FW-GDL-IVSP-06: [SUGGESTED NEW "Measures should be incorporated into authorized activities, project planning and implementation to prevent, control, contain, and eradicate priority investments or populations of invasive species to ensure integrity of native species populations and their habitats in maintained."] To prevent the spread and establishment of invasive plant species following surface- disturbing activities, areas identified as needing mitigation should be reseeded at the optimal time for optimal native revegetation per site-specific characteristics...

Desired Conditions FW-DC-FFM-02: [SUGGESTED NEW "People understand that wildland fire is a necessary natural disturbance process integral to the sustainability of the ecosystems in which fire is the primary disturbance."]

FFM Management Approaches

[SUGGESTED NEW "Coordinate with stakeholders to increase public understanding of the necessity of wildland fire as a process integral to the sustainability of the vegetation communities in which fire is a primary natural disturbance."]

In all ROS classes and in wilderness, prescribed fire and wildfires managed for resource objectives can be appropriate tools to treat and restore vegetative composition, structure, and function where fire is a primary natural disturbance.]

Desired Conditions FW-DC-CHR-02: [SUGGESTED NEW "Vandalism, looting, theft and human caused damage to heritage sites are rare."]

[SUGGESTED NEW "FW-DC-CHR-03 Site integrity and stability are protected and maintained on sites that are susceptible to imminent risks or threats, or where the values are rare or unique.]

[SUGGESTED NEW "FW-DC-CHR-04 Conservation and preservation efforts maintain site significance and integrity. Site eligibility is not impacted by visitors."]

[SUGGESTED NEW "FW-DC-CHR-05 Cultural and scientific values are continually enhanced through research and partnerships with tribes, universities, and museums. Interpretation and public involvement in archaeological activities increases appreciation and respect of cultural values and fosters a sense of stewardship for our common heritage."]

[SUGGESTED NEW "FW-DC-CHR-06 Heritage resources provide educational opportunities that connect people, past and present, to the land and its history. Public enjoyment is enhanced by opportunities to visit interpretive heritage resource sites. Interpretation of the human history promotes greater public understanding and appreciation of the prehistoric and historic cultures and communities that have depended on this landscape for their livelihood, recreation, and spiritual well-being and provides connections between prehistoric, historic, and modern people."]

[SUGGESTED NEW "FW-DC-CHR-07 Opportunities exist for volunteers to participate in heritage resource conservation activities such as research, site stabilization, conservation, and interpretation."]

[SUGGESTED NEW "FW-DC-CHR-08 Cultural resource findings are synthesized and shared with the scientific community and public through formal presentations, publications, and educational venues. The Forest Service actively contributes toward addressing heritage and current issues of local, regional, and national significance. The forest's historic documents (such as photographs, maps, records) are available to the public for approved research and interpretation."]

[SUGGESTED NEW "Guidelines for Heritage Resources"]

[SUGGESTED NEW "FW-G-CHR-09 Primary archaeological site and survey records should be maintained and updated. Associated records may be shared and maintained at institutions that meet professional standards (such as 36 CFR 79, American Museums Association accreditation) and have research interests on the forest.

[SUGGESTED NEW "FW-G-CHR-10 Heritage-based interpretive sites should be managed to enhance the public's understanding of the resource, protect and preserve the resource, and be consistent with tribal interests to protect the cultural setting of the site and visitor experiences."]

[SUGGESTED NEW "FW-G-CHR-11 Unplanned user-created trails that lead to archaeological sites should be eliminated to protect sites from damage and looting."]

[SUGGESTED NEW "FW-G-CHR-12 Through consultation with those tribes who are descendants of the prehistoric people or with groups that have associations with the area in historic times, historic and prehistoric sites should be managed to prevent or minimize adverse impacts."]

[SUGGESTED NEW "Management Approaches]

[SUGGESTED NEW "GMUG recognizes that there are important tribal sacred sites, ethnographic resources and traditional use areas and works to protect these resources using existing authorities in collaboration with federally recognized tribes."]

[SUGGESTED NEW "The Forest has strong working relationships with recognized tribes promote strong working relationships by addressing issues of mutual concern."]

You haven't addressed location and requirements for special uses such as solar and wind facilities. Need to develop DC, S, G, and MA for these.

Rangelands, Forage, Grazing

[SUGGESTED NEW "FW-DC-RNG-03: Livestock grazing should be managed to meet, or move toward, the desired conditions for forest resources such as soil, water, vegetation, and species."]

FW-GDL-RNG-09: To minimize bank destabilization and associated sedimentation and to maintain overall riparian ecosystem integrity, new and revised allotment management plans and annual operating instructions should follow Watershed Condition Practices Handbook or other best available direction.

[SUGGESTED NEW "Where permitted livestock have access to riparian areas, the use of riparian species should provide for maintenance of those species, allow for regeneration of new individuals, protect bank and soil stability, and reduce the effects of flooding. Maintenance of woody riparian species should lead to diverse age classes of woody riparian species where potential for native woody vegetation exists. This guideline would not apply to fine-scale activities and facilities such as intermittent livestock crossing locations, water gaps, or other infrastructure used to minimize impacts to riparian areas at a larger scale."]

Management Approaches

[SUGGESTED NEW "Collaborate with permittees, tribes, educational institutions, other agencies, and stakeholders in achieving and maintaining desired conditions, including invasive species management."]

Recreation Desired Conditions

[SUGGESTED NEW "FW-DC-REC-03: Low impact recreation principles are widely practiced by the visiting public. Recreation settings and forest resources are free from human litter and waste, graffiti, and vandalism.

FW-DC-REC-04: Short-term increases in recreation during holidays and weekends do not result in long-term adverse effects to other forest resources."]

[SUGGESTED NEW "FW-G-REC-17: To accommodate varying visitor access needs, programs, infrastructure, and services should incorporate principles of universal design and reflect current accessibility guidelines."]

[SUGGESTED NEW "FW-G-REC-18: Recreation site and use fees should be affordable to ensure access for a broad spectrum of forest visitors."]

[SUGGESTED NEW "FW-G-REC-19: Signs should be provided so people can easily find trails and facilities."]

Management Approaches

[SUGGESTED NEW "Adaptively shift limited resources to manage recreation facilities and opportunities as needed. Determine the operation or closure of a site based on the volume of use and operating costs. Develop a sustainable mix of Federal funds, area use fees, other funds, and partners to maintain or replace facilities and infrastructure as needed.]

Per Table 21, Hope Lake/Sheep Mountain - why are there exceptions for heliskiing in SPNM? Also why are there SPNM Winter areas that allow motorized oversnow use? In the definition of SPNM Winter it says "No oversnow vehicles are present."

There appears to be a conflict in SPNM for Double Top Recreation Management Area, Beckwith Special Management Area and Horse Park Recreation Management Area for motorized suitability.

Trails Desired Conditions

FW-DC-TRLS-01: A sustainable, diverse trail system is in place and maintained at least to the minimum standards appropriate for safe public access. National Forest System trails support multiple recreation use types that contribute to social and economic viability in the plan area, and connect established towns and developed recreation sites to the surrounding landscape. National Forest System trails are designed, [SUGGESTED NEW "constructed, signed,"] and maintained in a manner that ensures resource protection and facilitates positive visitor experiences.

[SUGGESTED NEW "FW-DC-TRLS-03: Trail use remains on the established trail surface, especially in high traffic or sensitive areas. Unplanned user-created trails are rare."]

[SUGGESTED NEW "FW-DC-TRLS-04: Damage to resources from visitor use of trailheads and trails is minimal and within the ability of the forest to mitigate or restore."]

[SUGGESTED NEW "FW-G-TRLS-05: Trails and trailheads should be designed, built, rerouted, or maintained utilizing current best practices that promote sustainable trail surfaces, prevent conflicts with neighboring lands, address impacts to other resources, and consider user experiences."]

[SUGGESTED NEW "FW-G-TRLS-06: Unplanned, user-created trails should be managed to prevent future access. Resources damaged by unplanned, user-created trails should be rehabilitated to accelerate recovery and to prevent further resource impacts."]

[SUGGESTED NEW "FW-G-TRLS-07: Motorized trails and trail systems should be designed to move users away from residential areas and to reduce conflicts between motorized users and neighboring lands."]

[SUGGESTED NEW "FW-G-TRLS-08: Closed roads should be considered for conversion to motorized and/or non-motorized trails to promote or expand recreation opportunities when it benefits or does not degrade other resources."]

Management Approaches

[SUGGESTED NEW "Collaborate with county and city trails coordinators, local groups, and area residents, when conducting trail planning. Consider needs for non-motorized and motorized trails, and provide opportunities for both."]

[SUGGESTED NEW "Maintain and expand volunteer partnerships with local communities, organizations, groups, and agencies to assist in trail planning, construction, and stewardship."]

DEIS

Table 123. Does not assess:

- * the effect of wildfire smoke from outside sources and potential for heavy smoke for extended periods of time.
- * wide spread loss of recreation opportunities and revenues from large scale, severe wildfire.
- * increased noise from timber, mining, and recreation use on recreation settings and opportunities for solitude.
- * large scale, severe wildfire on scenery and scenic objectives.
- * increased impact to riparian and aquatic resources from sudden increases in recreation visitors (estimated at about 30%)
- * chronically reduced water quantity and quality due to drought

Environmental Impacts are generally inadequate and incomplete. This section should cover all issues identified for each program area and cumulative effects. There is little explanation of the outcomes and why one alternative has more impacts than another.

To restate, the plan does not integrate climate change into the desired conditions on a consistent basis. The overriding concern on all aspect of forest management and this plan should be forest health. Each section of the plan should be reviewed and desired condition statements added or amended to assure forest health issues are adequately addressed. All of the opportunities on the GMUG that are available to the public necessitate a healthy forest ecosystem. This plan needs to make that clearer even at the expenses of restricting some uses at certain time or closing areas of the forest to bring areas up to the desired conditions.