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Submitted via webpage: <https://cara.ecosystem-management.org/Public//CommentInput?Project=51806>

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Thank you for the opportunity to comment on the GMUG draft Forest Plan and DEIS. Our Northern San Juan chapter of Great Old Broads for Wilderness (Broads) has engaged in this plan revision process from the outset submitting comments during scoping, the chapter 70 wilderness analysis & chapter 80 Wild & Scenic evaluation, and most recently, on the working draft in August 2019. Broads also has been an organizational partner to the coalition that submitted the Community Conservation Proposal (CCP.) We contributed to development of the CCP and support it in its entirety. Our chapter of over 300 supporters is volunteer-led and encompasses engaged members from Delta, Montrose, Ouray and San Miguel Counties. We are hunters and anglers, ranchers, wildlife watchers, citizen scientists, recreationists of all kinds, and business owners. Our national non-profit organization, with 40 chapters in 16 states, is dedicated to protection of wild lands and waters with a focus on preserving unfragmented habitat, enhancing biodiversity, and addressing climate change.

Management Areas

CORE Act designations

Thank you for recognizing within the draft plan the wilderness characteristics exemplified by the landscapes in the former San Juan Wilderness Act and currently being considered in Congress as part of the Colorado Outdoor Recreation and Economy (CORE) Act. We support the designation of these polygons as recommended wilderness. In addition, we strongly recommend your final draft plan include the Special Management Areas (SMAs) included in the CORE Act as SMAs in the final GMUG Forest plan including Liberty Bell East SMA and the portion of Sheep Mountain SMA that lies within the GMUG boundary. Omitting these SMAs in Alternative B (Alt B) undermines these polygons's value within the GMUG, the stakeholders who have worked tirelessly for over a decade to protect these lands, and the legislation championed by local and national elected officials since 2009.

Baldy Roadless Area Recommended Wilderness

Consistent with Alt D and the CCP, Broads supports the Baldy Roadless Area (RA) for recommended wilderness with summer and winter ROS settings of Primitive and Pristine respectively. We also agree with the GMUG's Alt D Scenic Integrity Objective (SIO) of Very High and your analysis (in both Alt B & D) that this RA is NOT suitable for timber. Designating the Baldy RA as recommended wilderness also adds lower elevation acreage to potential wilderness, which includes ecosystem types that are currently underrepresented in

congressionally designated Colorado Wilderness Areas and the national Wilderness System. Finally the Baldy polygon is critical wildlife habitat for many species and a migration route for big game species traveling between summer and winter ranges. From the GMUG Colorado Roadless Rule document (August 2011): This area is critical bighorn sheep habitat and is actively managed for this species with extensive habitat improvements. The northern half includes potential lynx habitat. This area is a black bear summer and fall concentration area, elk winter range and winter concentration area, elk production area, and is mapped as mule deer winter and summer range, as well as Merriam's turkey overall range.

Though we appreciate Alt B's inclusion of Baldy RA as a Wildlife Management Area (WMA) (named High Mesa/Baldy in draft plan) we unequivocally support and prefer recommended wilderness status for this polygon. Note also that Ouray County and the Town of Ridgway support recommended wilderness for Baldy. Backcountry Hunters & Anglers (BHA) report recommends Baldy as a Wildlife Management Area. https://www.backcountryhunters.org/wildlife_management_areas_-_gmug_report (Note: BHA generally does not comment on wilderness recommendations.)

Bear Creek Watershed Recommended Wilderness

Identifying the entire Bear Creek drainage in Ouray County as recommended wilderness is a top priority for Broads as proposed in the CCP, and gratefully, as acknowledged in Alt D. Alt B critically undervalues the natural qualities of this polygon. We agree with Alt D SIO of Very High and summer and winter ROS settings of Primitive and Pristine with the exception that Diamond Creek should be at least primitive (not semi-primitive, non-motorized as reflected in Alt D.) The semi-primitive non-motorized winter and summer ROS settings in Alt B are unacceptable and not representative of this polygon's natural values. The SIO rating in Alt B of High merely along the gorge and Moderate in the surrounding region coupled with the low ROS settings perhaps is a result of the limitations of map and data analysis when in fact personal observation with boots on the ground is required to appreciate the values and primitive qualities along the Bear Creek National Recreation Trail, off trail west of S. Fork of Bear Creek, and between Bear Creek Trail and Horsethief Trail/Cascade Pass (north of Bear Creek NRT.) The Bear Creek watershed is NOT suitable for timber and Broads opposes the GMUG's finding of suitable timber along New Horsethief Trail as reflected in Alt D. The determination of suitable timber within this polygon in Alt B is unreasonable and environmentally irresponsible given the inaccessibility of the area and the steep slopes. (See timber comments below.) The wildlife values described in our CCP narrative include connectivity/wildlife corridors, critical bighorn sheep production area, bighorn summer and winter range, elk winter concentration area and potential Canada lynx

habitat. Finally, the Colorado Natural Heritage Program (CNHP) Dexter Creek Potential Conservation Area (Moderate Biodiversity Significance) lies within the polygon, and CNHP has documented 2 occurrences of the state imperiled plant *Monardella odoratissima* (Mountain wild mint) G4/G5 S2 (D ranked) in the area. Ouray County and the Town of Ridgway support Bear Creek polygon as recommended wilderness.

It is noteworthy that Ouray Board of County Commissioners (BOCC) and Town of Ridgway have endorsed Bear Creek and Baldy RA as recommended wilderness. GMUG staff has repeatedly referenced the importance of county support for any kind of land or water special management or designation. Ouray County and Town of Ridgway endorsement aligns with the CCP. As of November 2021, the CCP is endorsed in its entirety by four municipalities, 140 businesses and 504 individuals. Broads certainly hopes you will consider this broad base of support when finalizing the forest plan.

Hayden Mountain Special Interest Area (SIA)

All draft alternatives place the CCP's proposed Hayden Mountain Special Interest Area (SIA) in [ldquo]general forest[rdquo] management type, which does not reflect the significant wildlife, botanical, and geological values of this 10,000-acre polygon. Moreover, the plan does not provide a range of options for management of this landscape. It is noteworthy that BHA has recommended Hayden as a WMA in their Report linked above and the Outdoor Alliance GMUG Vision endorses the Hayden Mountain SIA. Previous Broads's comments and the CCP emphasize that the Barstow and Greyhound mine sites (along with the motorized access routes to the sites) are excluded from our SIA proposed polygon. The remainder of this vast landscape proposed and buffered from Black Bear Road, CR 361/Camp Bird Rd and Hwy 550 provides valuable wildlife habitat for Canada lynx, bighorn sheep, bear, elk, moose, deer, and cliff-nesting raptors among other species. In particular, we note the summer range for elk where our members regularly witness 60-70 cows with calves, the regular sighting of a small but growing population of moose (though sadly a calf died in a vehicular collision in December 2020) and the occurrence of the Tier 1 RBS-21 bighorn herd in the southern portion of the polygon around Senator Beck Basin. The proposed Hayden SIA also affords a significant corridor for north-south migration providing connectivity between the San Juan National Forest and the Weminuche Wilderness all the way to the Mount Sneffels Wilderness and the Uncompahgre Plateau. It also has value as linkage between the Uncompahgre Wilderness and the west side of Highway 550 and Mount Sneffels Wilderness as evinced by the occurrence of RBS-21 bighorn throughout the region. Furthermore, Hayden provides for seasonal elevation movement for numerous species. In 2017, CNHP identified four Potential Conservation Areas in the region all with Very High Biodiversity Significance (Imogene Pass, Ironton Park, Mineral Basin, & Ouray Canyons.) CNHP has also reported the occurrence of three globally and/or state imperiled plants in the polygon: New Mexican cliff fern (*Woodsia neomexicana*) G4/S2 (B ranked); Western polypody (*Polypodium hesperium*) G5/S1S2 (B ranked); and San Juan Draba (*Draba graminea*) G2/S2 (A ranked) as well as one plant association in the adjacent Ironton Fen identified as Dwarf birch/Sphagnum shrubland (*Betula glandulosa*/Sphagnum) G2/S2 (B ranked.) At a time of diminishing global and regional

biodiversity coupled with the threats of increased recreation impacts and climate change, the GMUG has both an opportunity and responsibility to protect this region for its species diversity, relatively unfragmented habitat, wildlife connectivity, and refugia potential. Broads advocates for Primitive ROS settings for both winter and summer. We would argue that the [ldquo]less than 3 miles from motorized route[rdquo] criteria for primitive rating should not apply to this landscape due to its natural values, and we note that other areas across the GMUG with Primitive settings are within 3 miles of motorized routes.

At an absolute minimum, we recommend winter and summer ROS of Primitive for at least the north section of the polygon at higher elevations (specifically between Richmond Trail and Neosha Trail above 11,000 feet,) and semi-primitive, non-motorized for the rest of the landscape. Similarly, we argue that Hayden warrants a SIO rating of Very High throughout, however at a minimum Hayden is deserving of Very High SIO in the higher elevations with a High rating for the remainder of the polygon. We want to remind the GMUG that the Hayden polygon (like Bear Creek) was part of the 1930s-era Uncompahgre Primitive Area, and as a result, not inventoried during the 1970s Roadless Area Review and Evaluation. Nor was it analyzed in the early 2000s during the Colorado Roadless Rule. Mining claims purchased by the Red Mountain Project and transferred to the USFS have basically eliminated concerns regarding private inholdings that would pose conflicts with SIA status. As far as we can ascertain, the USFS has never inventoried this critical landscape for its ecological qualities. We argue that Hayden has [ldquo]fallen through the cracks[rdquo] in the inventory process. Maps and databases cannot accurately represent the values found within this polygon, and we strongly recommend the GMUG take a closer look at this proposed Hayden SIA by putting some staff on the ground to document natural resource values. The GMUG may also recall that the CCP initially proposed Hayden for recommended wilderness (as it

meets the requirements for wilderness character) however after learning of one existing use that is incompatible with a wilderness designation, CCP changed its proposal to Hayden Mountain SIA. Therefore, [ldquo]general forest[rdquo] is an inappropriate management area for Hayden that could result in the sacrifice of critical wildlife habitat and sensitive botanical species, the loss of species diversity, and the degradation of scenic values. No acreage anywhere within the CCP[rsquo]s proposed Hayden SIA should be considered suitable for timber. The vast majority of the landscape has slopes greater than 40%. Under no circumstances should any disruption of soils occur on slopes above the Iron-ton Fen (regardless of slope angle.) Unstable soils could cause sediment deposition in the fen that would irreversibly damage that ecosystem. Broads opposes even the small area of suitable timber within the polygon included in Alt D. Hayden is representative of the landscapes that the GMUG could protect in the revised forest plan that would contribute toward President Biden[rsquo]s America the Beautiful executive order to preserve 30% of our nation[rsquo]s lands and waters by 2030. If a special designation is, in the opinion of the GMUG, untenable, then Hayden must, at a minimum, be managed as a Wildlife Management Area (consistent with BHA[rsquo]s recommendation.) According to our calculations, the current route density across the 10,400 acre proposed Hayden Mountain SIA polygon is 0.65 miles per square mile when using USFS recognized routes and 1.09 miles per square mile when including additional routes used by locals but not appearing on USFS maps. Certainly these metrics coupled with BHA and OA

support and the wildlife values described above would qualify the Hayden polygon as a WMA if not a SIA.

Mount Abram/Brown Mountain Scenic Special Interest Area

The Mount Abram Scenic SIA (and apologies to Abram Cutler for the misnaming of the peak in the original narrative) is valued for its scenic beauty and wildlife values. The summit and the adjacent Brown Mountain ridgeline that extends for three miles provide an iconic visual skyline treasured and photographed extensively by locals and visitors to Ouray County. Gray Copper Falls is a destination for hikers to enjoy its beauty. Critical habitat for Canada lynx and important moose habitat lie within this polygon. We support Semi-primitive, Non-motorized summer ROS settings. While a winter ROS of Semi- primitive, motorized within half mile of snowmobile routes is appropriate; the ridgeline of Brown and Abram and the area between FS Rd 884 and 878/876 should be Semi- primitive NON-motorized. We support a SIO of High, which is consistent with Alt D and the San Juan Skyway Corridor designation. None of the Abram/Brown SIA polygon should be considered suitable for timber for the same reasons outlined above for Hayden with an emphasis on protecting the viability of the Iron-ton Fen.

Turret Ridge, Little Cimarron, Failes/Soldier Creek Recommended Wilderness Broads also supports the addition of Turret Ridge, Little Cimarron, Failes/Soldier Creek polygons to the Uncompahgre Wilderness as proposed in the Gunnison Public Lands Initiative. Ouray County and the Town of Ridgway support recommended wilderness for these three landscapes, and CPW and BHA recommend these landscapes as WMAs.

All three are Colorado Roadless Areas. All three landscapes are important wildlife habitat and allow for seasonal migration of species from higher elevations to winter habitat. These parcels would also add underrepresented ecosystem types to the Colorado and national system being managed for wilderness characteristics. Turret Ridge is wild and rugged with no existing routes. It offers unmatched opportunity for solitude and primitive recreation available only to the adventurous foot traveler.

Colorado Roadless Rule document (August 2011) mentions habitat for black bear, mountain lion, turkey, mule deer, elk, moose, bighorn sheep and Canada lynx. The report even mentions potential habitat for wolverine! Sensitive species including boreal owl, northern goshawk, and American three-toed woodpecker depend upon the spruce/fir forest in this area. The nearby forks of the Cimarron River contain Colorado cutthroat trout. The geology dominated by pinnacle tufts and cliffs is unmatched in its scenic beauty and spectacular skyline. Turret Ridge unconditionally warrants recommended wilderness status. Both its winter and summer ROS settings should be Primitive (not semi-primitive motorized and semi-primitive non-motorized respectively, as reflected in Alt B & D.) Little Cimarron Roadless Area provides habitat for all the species identified above (with the exception of wolverine) as well as white-tailed ptarmigan. Moreover, CNHP has identified the Little Cimarron Potential Conservation Area (PCA) for its montane riparian habitats. Failes Creek/Soldier Creek Roadless Area also provides habitat for the majority of species listed above and offers bald eagle winter range as well. CNHP has identified the Big Blue Campground PCA for its

subalpine riparian willow carr. All three of these polygons would be easily managed as recommended wilderness given their shared boundaries with the existing Uncompahgre Wilderness.

Additional specific landscapes

Broads cites the following concerns:

[middot] No lands should be deemed suitable for timber along Nate Creek Trail (western edge of Cimarron Ridge Roadless Area) nor along the Dallas Trail (north of Sneffels Range and adjacent to Mount Sneffels Wilderness and Whitehouse Roadless Area (A majority of the Whitehouse RA is included in the CORE Act's Whitehouse Addition to the Mount Sneffels Wilderness.) Logging adjacent to these trails would severely impact recreational use and scenic values. The close proximity to Roadless Areas is also concerning.

[middot] Cimarron Ridge Roadless Area should be a WMA with a winter ROS of Semi- primitive Non-motorized.

[middot] Wilson Summit should have an SIO of Very High or at a minimum High (the latter consistent with Alt D.) The moderate rating in Alt B totally underestimates this scenic wonder!!

Wild & Scenic River Suitability Cow Creek and Tributaries

Broads whole-heartedly supports the GMUG's finding of Cow Creek and its tributaries -- Wildhorse Creek, Wetterhorn Creek, and Difficulty Creek - eligible as [ldquo]wild.[rdquo] We request that the final draft also recognize the geological, scenic, wildlife, and botanical ORVs for this segment. The presence of Tier 1 Rocky Mountain bighorn sheep (*Ovis Canadensis*), Black Swift (*Cypseloides niger*) and possibly boreal toad (*Bufo boreas boreas*) is justification for a wildlife ORV. CNHP ranks Cow Creek as possessing Very High Biodiversity significance including excellent (A-ranked) occurrence of the globally imperiled (G2G3/S2S3) *Pseudotsuga menziesii*/*Paxistima myrsinites* lower montane forest and excellent (A-ranked) occurrences of the globally vulnerable (G3/S3) *Populus angustifolia* - *Picea pungens*/*Alnus incana* montane riparian forest as well as excellent (A-ranked) occurrences of common riparian communities. A fair (C-ranked) occurrence of the state rare (G4/S2) New Mexico cliff fern (*Woodsia neomexicana*) is also documented.

Roubideau Creek

Broads agrees with Roubideau Creek and its tributaries being found eligible as [ldquo]wild[rdquo] and that Roubideau has Scenic and Geologic ORVs. We recommend that this segment[rsquo]s Botanical, Wildlife and Heritage ORVs be recognized and included in the final draft. CNHP ranks Roubideau Creek as possessing Very High Biodiversity significance identifying excellent and good occurrences of plant communities, which are imperiled on a global scale, as well as the presence of the following species:

Montrose bladderpod (*Physaria vicina*) (G2S2) B-ranked; Colorado hookless cactus

(*Sclerocactus glaucus*) (G2G3/S2S3 and listed endangered) C-ranked; Grand Junction milkvetch (*Astragalus rafaensis*) (G2/S2S3) B-ranked; and long-flower cat's-eye (*Oreocarya longiflora*) (G3/S3) C-ranked. Botanical ORVs would contribute to protection of water flows necessary to preserve unique riparian areas and plant diversity. Wildlife ORV is supported by the presence of northern leopard frog (*Rana pipiens*) and desert bighorn (*Ovis canadensis nelsoni*) in the watershed as well as three warm water fish species: Roundtail Chub (*Gila robusta* G3/S2), Bluehead Sucker (*Catostomus discobolus*), and Flannelmouth Sucker (*Catostomus latipinnis*.) Broads is aware of references to a rock panel in the canyon that includes an inscription by explorer Juan Antonio Maria de Rivera from 1769 as well as a depiction of a bighorn sheep qualifying Roubideau Creek for Historic ORVs. We recommend the GMUG map this culturally significant site that has been nominated to the National Register of Historic Places. Finally, Broads also strongly recommends that the GMUG final draft be consistent with BLM[rsquo]s Resource Management Plan for Roubideau adopted in 2020.

Bear Creek

Bear Creek is a priority segment for Wild and Scenic River eligibility for Broads and exceeds the criteria required for eligibility as [ldquo]wild[rdquo] Bear Creek is free-flowing along its entire length and is accessed only by a rugged trail. The scenery is spectacular with deep gorges, thundering waterfalls, dramatic cliffs and golden aspen in autumn qualifying Bear Creek for a Scenic ORV, which the GMUG recognizes in its Chapter 80 analysis. Geologic features including volcanic tuff pinnacles, iron-rich intrusions and fossilized ripple marks qualify this segment for Geologic ORV. Recently published research by Dr. Dave Gonzales, a geology professor at Fort Lewis College, provides evidence of an Eocene paleocanyon cut into the San Juan Formation volcanoclastics. (Gonzales et al. 2021.) In addition, the mineralized waters of South Fork of Bear Creek possess that aqua quality similar to the Little Colorado and Havasu Rivers. Our members are not aware of another example of this feature in the region. The Bear Creek National Recreation Trail (NRT) that climbs and follows the creek is undoubtedly river-related; Broads would argue that the NRT would not have been designated without the magnificence of cascading waterfalls, dramatic cliffs of the gorge, and sections of bubbling flow over massive boulders. Consequently, Bear Creek should be recognized as having Recreation ORV. Finally, Broads is concerned that Bear Creek was found eligible in the GMUG[rsquo]s 2005 Wild and Scenic Comprehensive Assessment, but not in the current draft forest plan. Although we acknowledge that the 2005 assessment was never adopted, still there is no evidence or explanation in the draft plan that conditions along this segment have changed diminishing Bear Creek[rsquo]s ORVs. We strongly support Bear Creek as Wild and Scenic River eligible and emphasize that Ouray County and the Town of Ridgway endorse this recommendation.

Broads appreciates your attention to the following comments regarding plan components and prescriptions.

Wildlife Management Areas (WMAs)

Broads is committed to preserving unfragmented wildlife habitat and wildlife corridors, and the management type called Wildlife Management Area makes an excellent addition to options for protecting specific areas for their wildlife values. Such protection cannot be overemphasized during these times of drought, wildfire, extinction trends, decreasing biodiversity, and increasing recreation use and abuse. Broads is grateful to Colorado Parks & Wildlife (CPW) for envisioning and proposing WMAs. We are aware that CPW's list of polygons worthy of WMA status covered 50% of the GMUG Forest.

This fact is a reality to be celebrated and embraced by land managers. Our forest possesses such exceptional quality wildlife habitat and should be managed to preserve and enhance these values as well as the ecosystem services afforded by these lands. However, instead of accepting and endorsing CPW's recommendation in the draft plan, the GMUG chose to select only half of CPW's proposed WMAs to include in the draft.

Our members value wildlife and venture onto public lands specifically with wildlife watching as a purpose. Furthermore, our organization participates in numerous wildlife community science projects to further understanding of species' populations and trends and to contribute to the databases available to researchers, decision-makers, land managers and the general public. We oppose the reduction of WMAs from 50% of the forest to 25%. We strongly recommend that the GMUG re-evaluate their decision and include more acreage as WMAs in the final plan as proposed by CPW - the state's wildlife experts. Broads is committed to the CCP, and wherever Alternative D's wilderness and SMA recommendations overlap with the WMAs identified in Alternative B, of course, we support the stronger management prescriptions that Alternative D's wilderness and SMA areas provide. Broads wholeheartedly supports the concept of WMAs and asks that this management type be retained in the final plan. We advocate that WMAs be more effectively protected and managed via addition or revision of the following plan components:

[middot] Broads supports the one-mile per square mile route density threshold in MA-

STND-WLDF-02 and wants to emphasize that generally new routes should be prohibited in these areas for non-emergency uses. It appears this standard does not apply to administrative routes, and therefore WMAs need an additional plan component, preferably a standard that reads: [ldquo]Construction of temporary roads in WMAs should be severely restricted and full closure and obstruction of all temporary roads immediately following use is required.[rdquo]

[middot] Guideline: [ldquo]Lower route densities will be retained in WMAs. Even in circumstances where a WMA has an existing route density less than 1

mile/square mile, consideration of additional routes within the WMA should be scrutinized.[rdquo]

[middot] Guideline: [ldquo]Preservation of 500-acre or more parcels that are devoid of routes in specific big game habitat are prioritized to ensure wildlife viability and meet desired condition MA-DC-WLDF-01.[rdquo]

[middot] Standard: [ldquo]Any vegetation treatment project proposed in a WMA must be solely

for the desired objective of improved wildlife habitat. Commercial timber harvesting is strictly prohibited in WMAs.

Standard: Any re-vegetation efforts in WMAs must use only native plants.

Finally, Appendix 12 references Zone of Influence with regard to MA-STND-WLDF-02 however the implications of the Zone of Influence are not clear as to preserving unfragmented habitat. Clarification is needed.

Imperiled Species and Species of Conservation Concern (SCC)

Much discussion has transpired before and during the comment period regarding the interpretation of SCC guidelines, and Broads thanks the GMUG for holding a special open house webinar to address concerns. We are in agreement with many other conservation and wildlife advocacy groups that numerous imperiled species are not on the GMUG's SCC list.

Forest Service Handbook FSH 1909.12 Land Management Planning Handbook Chapter 10 (page 38) under 12.52d Species to Consider when Identifying Potential SCC states:

3. Species in the following categories should be considered:

- a. Species with status ranks of G/T3 or S1 or S2 on the NatureServe ranking system. See exhibit 01 for description of NatureServe Conservation Status Ranks.
- b. Species listed as threatened or endangered by relevant States, federally recognized Tribes, or Alaska Native Corporations.
- c. Species identified by Federal, State, federally recognized Tribes, or Alaska Native Corporations as a high priority for conservation.
- d. Species identified as species of conservation concern in adjoining National Forest System plan areas (including plan areas across regional boundaries).
- e. Species that have been petitioned for Federal listing and for which a positive 90-day finding has been made.
- f. Species for which the best available scientific information indicates there is local conservation concern about the species' capability to persist over the long-term in the plan area due to:
 - (1) Significant threats, caused by stressors on and off the plan area, to populations or the ecological conditions they depend upon (habitat). These threats include climate change.
 - (2) Declining trends in populations or habitat in the plan area.
 - (3) Restricted ranges (with corresponding narrow endemics, disjunct populations, or species at the edge of their range).

(4) Low population numbers or restricted ecological conditions (habitat) within the plan area.

It appears the GMUG is relying solely on (f) above and deciding that a species needs to meet all four criteria in (f) to be considered a SCC. There is no indication above that (f) is intended to use [and] rather than [or] in that list of criteria. The DEIS neither justifies nor references the Regional Forester's justification for the requirement of a species to meet all four criteria for listing as a SCC. We would argue that, if a species meets even one, but certainly two or three, of the four criteria, then that species should be designated a SCC. Furthermore, for many species, the GMUG does not possess sufficient data to determine if a population is declining, and yet it appears insufficient data equates to [no declining trend] in the analysis. This illogical conclusion must be addressed in the final draft. Furthermore an objective must be added to update [historic] data (i.e. greater than 20 years old) within 5-10 years with perhaps a shorter timeframe for potentially imperiled species. Criteria (a) through (e) above are critical and any one of them alone would qualify a species for SCC. Therefore in keeping with these arguments above, we recommend that the following fauna species be added to the SCC list in the final plan: American marten, Rocky Mountain bighorn sheep, desert bighorn sheep, northern goshawk, boreal owl, flammulated owl, peregrine falcon, Lewis's woodpecker, black swift, white-tailed ptarmigan, western bumblebee, green-lineage Colorado cutthroat trout and several species of potentially imperiled bats including but not limited to little brown bat & Townsend's big-eared bat. Broads supports recommendations in CPW's letter of June 29, 2021 for additional species.

Given our organization's focus on the Ouray County region, we want to elevate, in particular, the urgency to list bighorn sheep as a SCC. As you are well aware, the RBS- 21 herd is a Tier 1 herd with little to no genetic introduction. This herd is extremely vulnerable to the transmission of a respiratory disease carried by domestic sheep and goats. There is valid justification for bighorn sheep qualifying as a SCC under the eligibility components (b,) (c,) and 3 of the 4 (f) criteria above. (b:) Colorado Parks and Wildlife (CPW) has designated bighorn sheep as Species of Greatest Conservation Need (SGCN) in the State Wildlife Action Plan (SWAP). (c:) Rio Grande National Forest (RGNF) (which borders the GMUG) has designated bighorn as SCC in their forest plan. Furthermore the Core Home Range of RBS-21 includes both the RGNF and the GMUG and bighorn do not recognize forest boundaries. The GMUG claims that bighorn do not qualify for SCC since they do not meet #3 of (f) above since bighorn in the GMUG are not at the edge of their range. However, we argue that bighorn need not meet all four criteria under (f) given their imperiled status AND that either (b) or (c) alone would qualify bighorn for the SCC list. When a species meets this many criteria in the FSH list, we find it irresponsible of the GMUG to omit bighorn from the SCC list. If given all this justification, the GMUG and Regional Forester are still unwilling to list bighorn sheep as a SCC, the most stringent plan components must be drafted to provide the greatest protection possible for bighorn. Broads supports the plan components in the comments submitted by CPW and Rocky Mountain Bighorn Society during the draft plan comment period.

STND-SPEC-13, requiring separation of bighorn sheep and domestic sheep must remain a standard. Nevertheless, draft plan components are insufficient to ensure effective separation. In reality, to guarantee effective separation between domestic and bighorn sheep, domestic sheep grazing and trailing would need to be eliminated from upper Bear Creek and the Cow Creek tributaries as this entire area is bighorn range.

Furthermore, observations document bighorn forays of over 20 miles. Research has demonstrated that best management practices are NOT sufficient to guarantee effective separation. The most recent version (2012) of the Western Association of Fish and Wildlife Agency's Recommendations for Domestic Sheep and Goat

Management in Wild Sheep Habitat states: [ldquo]Effectiveness of management practices designed to reduce risk of association are not proven and therefore should not be solely relied upon to achieve effective separation.[rdquo]

As a result, Broads strongly recommends an additional standard: [ldquo]The GMUG must employ quantitative risk analysis using the best available science (currently the Risk of Contact Model) when evaluating risk of contact between domestic and bighorn sheep and must utilize this data when considering permit renewals.[rdquo] The Risk of Contact Model was developed jointly by the USFS and BLM and represents the best available science to date for evaluating the risk of grazing domestic sheep in close proximity to wild sheep. Modeled annual contact rates, produced by Risk of Contact (ROC) analysis, that result in predicted disease intervals more frequent than considered allowable to maintain herd viability should result in closure of those high risk grazing allotments.

Regular ROC assessment and stringent application of the results to inform grazing permitting are critical to the viability of bighorn in our region.

Another standard should read: [ldquo]Grazing permit renewals must undergo a NEPA process.[rdquo] Use of FLPMA for renewals to circumnavigate a public process is unacceptable. Broads is aware of grazing permits that have been automatically renewed for decades without a NEPA review.

Broads appreciates FW-STND-LSU-06 to not grant permits for requests for new apiaries within the GMUG boundary as such apiaries create competition for native bees/pollinators. We are pleased to learn from Project Eleven Hundred that there are currently no existing permits for apiaries on the GMUG.

Broads appreciates and supports the GMUG including an objective and standard (FW- OBJ-SPEC-04 and FW-STND-SPEC-05) to prevent bird entrapment through the use of vent screens on USFS facilities. This measure will help all populations of birds across the GMUG.

Broads finds it totally unacceptable that the draft plan weakens protections for the federally threatened Canada lynx. The spruce beetle outbreak radically altered lynx habitat on the GMUG diminishing quality habitat. The current 1983 plan has strong protections for what was once considered the best lynx habitat on the forest before the large-scale tree die-offs. However, the draft plan opens up what is now the best remaining habitat for lynx to significantly more logging, without any scientific justification. This unjustified impact to lynx must be rectified in the final plan. The draft also removes a key standard that protects lynx habitat from excessive timber harvesting and salvage logging. It allows salvage logging to exceed the existing 15% harvest limit within a Lynx Analysis Unit in a 10-year period. The standard protecting lynx habitat from logging must be restored and strengthened in the final plan. The remaining quality lynx habitat must be deemed unsuitable for timber in the final plan, and the plan must consider the effects of current and future beetle infestation and climate change on this species. Connectivity of habitat is critical to this lynx recovery. Linkages across the landscape must be protected and management direction provided in a standard.

Vegetation management and motorized recreation should be limited in connectivity corridors. The first management approach for lynx on p. 35, to evaluate and update lynx

linkages, must be a standard and a time frame of 2-3 years must be associated with this standard.

Gunnison sage-grouse (GSG) is another federally threatened species whose portions of critical habitat have been found suitable for timber management in the draft plan. These acres should not be included in the suitable timber base since timber management is incompatible with management of this species. The plan requires the Forest, within 10 years, to identify and permanently or seasonally close redundant and illegal roads that are within 2 miles of known leks. Since there are only 15 known leks on the Forest, and this is a Federally threatened species, this objective should be accomplished within 1-2 years, not 10. OBJ-SPEC-38 should be a standard and closure and obstruction of redundant and unneeded routes within two miles of GSG leks should be accomplished as soon as possible and within less than 5 years. Another plan component should also require monitoring of habitat for new illegal routes. 230 miles of roads and motorized trails are located in occupied habitat and 164 miles in unoccupied habitat making the current route density in GSG habitat greater than the metric proposed for WMAs. This is unacceptable and route density must be reduced as soon as possible. OBJ-SPEC 40 regarding fencing in occupied GSG habitat should be elevated to a guideline and accomplished within 3 years of plan release (not 5.) GDL-SPEC 43 must be a standard for active leks, and the buffer for prohibition on surface disturbance must be greater than the draft plan's one-mile distance from leks. Given the literature review by Manier et al. (2014,) the recommended buffer for sage grouse generally is 4 miles, and Aldridge and Boyce claim 6 miles or greater is warranted for GSG in particular. Finally, adherence to the GSG Recovery Plan and Recovery Implementation Strategy must be a standard (rather than a management approach.)

OBJ-SPEC-54 and STND-SPEC-55 see Priority Watersheds and Conservation Watershed Networks below.

Regarding imperiled plant species and botanical SCCs, Broads is in agreement with and fully endorses the comments submitted by professional botanists Peggy Lyon and Gay Austin. Please refer to their submission for our comments on botanical species. We also fully support the Colorado Native Plant Society's submission dated November 8, 2021 that addresses plan components related to botanical values in the draft plan.

Suitable Timber

Alternatives B, C, & D in the draft plan all propose a significant increase in acreage beyond the current plan. We recognize that this increase is, in part, due to the 2012 Planning Rule; however Broads argues that the abundant acreage found suitable for timber is still excessive and jeopardizes carbon sequestration, soil health, wildlife habitat, biodiversity, water quality and the agency's mission of multiple use. We ask that the GMUG utilize the discretion within your authority to arrive at a more reasonable and realistic acreage of suitable timber in the final draft. Moreover, the draft plan does not provide a reasonable range of alternatives given that all alternatives significantly exceed the no action alternative and the blended Alt B does not differ remarkably from the commodity/active management Alt C. Under no circumstances should slopes

greater than 40% be found suitable, and this restriction must be included in the plan as a standard. Though Broads recognizes that the 2012 Planning Rule does not require consideration of economic feasibility when

evaluating suitability, we argue that finding as suitable those lands that cannot be harvested economically, or in some cases, that cannot realistically be harvested at all, leads to artificially inflated calculations for sustained yield limit, projected timber sale quantity, and projected wood sale quality.

Such metrics are therefore deceptive and could mislead 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. Please re-evaluate both your process and lands found suitable in the draft to generate a more authentic representation of lands suitable for timber in the final draft. Specific to Ouray County, please see comments above regarding specific landscapes (Baldy, Bear Creek, Hayden, Abram.) Note also that, due to recreation and scenic values, there should be no lands deemed suitable for timber along Nate Creek Trail (western edge of Cimarron Ridge Roadless Area) nor along the Dallas Trail (north of Sneffels Range and adjacent to Mount Sneffels Wilderness and Whitehouse Roadless Area. (Note: A majority of the Whitehouse RA is included in the CORE Act's Whitehouse Addition to the Mount Sneffels Wilderness.) Finally, all critical habitat and potential climate refugia for Gunnison Sage Grouse and Canada lynx, two federally threatened species, should be removed from acreage found suitable for timber.

Range and grazing

Broads finds it very disturbing that 80% or 2,382,269 acres of the GMUG is managed for livestock across 223 allotments. Though Broads and our conservation coalition commented on this topic during scoping, we were informed by the GMUG that a thorough review of the grazing program during this plan revision was not warranted. Broads recommends there be a preliminary determination of land suitable for livestock grazing at the forest plan level, just as there is for timber production. Suitability should be determined for capable rangeland, based on the management areas and forest-wide plan components. At a minimum, areas in and near populations of rare plants and habitat for bighorn sheep, Gunnison prairie dog and Gunnison sage grouse should be unsuitable for livestock grazing. Although rangeland condition has improved over the past two decades, 29 percent (more than 400,000 acres) of rangelands are in fair or poor condition. These metrics are unacceptable and must be addressed in the final draft with stronger plan components. Rangeland health has been a concern of our organization since its founding over 30 years ago. Many of our members are active hikers, backpackers and wildlife watchers. They often report erosion, overgrazing, and excessive feces due to livestock grazing where they recreate and camp in the backcountry. To that end, we recommend the following revisions to plan components:

* First, thank you for recognizing the critical need to preserve wildlife forage in DC- RNG-01.

* We appreciate the prohibition on salting in STND-RNG-06 and recommend

addition of Gunnison prairie dog habitat to the list of sensitive areas.

* STND-RNG-07 is very concerning as Broads does not consider livestock grazing as a strategy for rehabilitation treatment due to grazing's often deleterious effects on water quality, soil health, and biodiversity. Any use of livestock grazing as a

[treatment] should be extremely limited and allowed only following thorough review from range conservation experts. We question the purpose and validity of this standard.

* Broads appreciates the GMUG's effort to limit utilization, however STND-RNG-08

misrepresents the definition of moderate utilization. Utilization over 50% is considered heavy grazing. Broads strongly recommends this standard limit grazing to 30% of current above-ground biomass and 25% under

drought conditions. This conservative utilization of 30% (i.e. leaving 70% of the plant by weight) has been documented to be economically sound and ecologically beneficial. (Holechek et al. 2006.) Furthermore, STND-RNG-08 is undermined by the multiple exceptions referenced. If this standard is to be effective in its implementation on the ground, exceptions must be drastically reduced and only applied when substantiated by science and thoroughly reviewed by appropriate experts who have personally inspected the allotment under consideration.

* The following guidelines need to be standards as they are critical plan components to ensure ecological health of allotments and all relate back to our

organization's concerns re: erosion especially in riparian areas, overgrazing, excessive feces and preservation/enhancement of biodiversity: GDL-RNG-09, GDL-RNG-10 and GDL-RNG-11.

* The phrase "Watershed Conservation Practices Handbook should be followed" in

GDL-RNG-09 should be changed to "Watershed Conservation Practices Handbook must be followed."

Broads also strongly recommends addition of the following plan components:

* Objective: Within one year of plan approval, publish a list of processes available for public participation in livestock management decisions, and how concerns raised by the public will be processed. Currently to our knowledge, the GMUG does not provide the public with formal avenues for communication by which the public can expect a response to grazing problems observed or documented and submitted to the GMUG. Furthermore the GMUG provides no process for responding to suggestions from the public regarding better livestock management on public lands. We recognize the limited capacity of the Forest Service, and therefore strongly recommend that partner organizations and the public are provided with a clear, defined process to contribute information and can rely upon the GMUG's response and potential action commensurate with concerns.

* Objective: Within 2 years of plan approval, develop processes by which permittees may apply for (a) reduced use for conservation and restoration

purposes (while retaining existing permit numbers); and/or (b) voluntary closure of all or part of an allotment based on ecological values, location within wilderness, conflicts with other forest uses, and/or lack of sufficient production for economic sustainability. Permittees who might want to reduce their livestock use in response to conditions on the allotment for which they have a permit are reluctant to do so, in fear of being cited for not running cattle at near-permit limits or having their permit numbers reduced. Amid rising temperature and frequent below-normal precipitation, the current policies provide disincentives for

conservation and restoration by the permittee.

* Objective: Within 8 years of plan implementation, all Allotment Management Plans (AMPs) that are older than 10 years will be revised.

* Standard: All Allotment Management Plan (AMP) revisions will be completed with

NEPA Environmental Assessments or Environmental Impact Statements. Renewal of grazing permits and AMP revisions using FLPMA are prohibited. (See comments re: STND-SPEC-13 above.)

* Standard: Seeding of perennial, non-native species for forage is prohibited.

* Standard: Livestock Annual Operating Instructions must recommend non-lethal methods of avoiding predator

depredations (e.g., guard dogs, portable electric fencing and fladry, herders, range riders, etc.), especially during high-risk time periods (e.g., calving/lambing).

* Standard: Predator control to protect livestock cannot be undertaken without documentation of the failure of predator avoidance efforts by livestock operators. There are well-developed and effective herd management methods that enhance co-existence between carnivores and livestock. See the organizations Working Circle <https://www.workingcircle.org> and Wood River Wolf Project <https://www.woodriverwolfproject.org>

* Standard: Livestock cannot enter a pasture for the season of use until permittee- maintained fences, water developments, and other livestock developments are in

functioning condition. Wherever fences are down (which is, unfortunately, frequent,) cattle wander into springs, neighboring allotments, or other areas where they are not authorized.

* Standard: Improvement to riparian ecosystem health will be achieved within 3-5

years of plan release by restricting or prohibiting livestock grazing in sensitive riparian areas. Livestock grazing can have significant impacts to riparian and wet meadow ecosystems. The current vegetation condition and ecological integrity of all wet meadow and riparian shrub and woodland ecosystems on the GMUG are moderately departed from reference conditions. Of particular concern is the cottonwood riparian ecosystem with significant departure in vegetative condition. The draft forest plan has no specific grazing standard to protect or restore these sensitive riparian and wetland areas.

Broads sees an obvious need for boots on the ground monitoring of allotments by USFS personnel or qualified volunteers (and like Broads commitment to solitude monitoring on the Ouray District, we would be more than willing to assist!) To that end, we suggest the following standard: Allotments in fair or poor conditions and those showing degradation over time must be surveyed/monitored every 2 years and improved range conditions must be achieved within 3 years of the survey.

Climate change

One of our national organization's three priorities is: "To make public lands part of the solution to climate change." Currently, if US public lands were a country, they would rank fifth among all nations for greenhouse gas emissions.

[Figure Excerpted from original letter]

Therefore, we consider the GMUG Forest plan revision an opportune time to address climate concerns with climate-relevant desired conditions and robust plan components. Broads appreciates that the GMUG has given some consideration to climate impacts and mitigating climate change in aspects of the draft plan, particularly the intent to identify refugia. However, we believe overall the plan is weak in its prescriptions and could be more specific, timely, and encompassing in its efforts to address climate concerns throughout the plan. By protecting more landscapes as recommended wilderness, special interest (or management) areas and WMAs as suggested, in part, in Alternative D, the plan would contribute significantly to America the Beautiful (aka 30 X 30) initiative to protect 30% of US lands and waters by 2030. Given that the GMUG Forest is fortunate to possess within its boundary so many pristine ecosystems, relatively unfragmented habitats, wildlife corridors, and diverse elevation landscapes harboring biodiversity, the revised forest plan should protect as much acreage as possible with management areas and strong plan components to maintain or enhance natural values. It is long past time that the USFS prioritize ecological values and ecosystem services above corporate interests and recreation

demands. The pressures for development will continue to exist and likely increase, nevertheless a planet that sustains life is of far greater value than one which elevates Gross Domestic Product.

To that end, we ask that the final plan:

- [middot] Maximize recommended wilderness, SIAs/SMAs and WMAs
- [middot] Identify climate refugia for protection in 2-5 years (rather than the 10-year timeline in the draft plan)
- [middot] Use the GMUG[rsquo]s discretion to re-evaluate the acreage deemed suitable for timber to include an analysis of carbon sequestration and impacts on water quality and quantity
- [middot] Thoroughly review the carbon storage potential of the GMUG and recognize carbon sequestration as a critical ecosystem service, develop a baseline for current carbon sequestration capacity and include plan components to require an analysis of emissions versus sequestration when evaluating future projects
- [middot] Consider the GMUG[rsquo]s significant role in ecosystem services including but not limited to the contribution to twenty-one water suppliers for domestic and agricultural use
- [middot] Apply the approach recently developed by Rocky Mountain Research Station scientists to estimate carbon stocks in rangeland (Reeves, 2020)
- [middot] Evaluate the grazing program within 5 years of plan release to determine the carbon budget of grazing across the GMUG
- [middot] Include management direction (and plan components) to increase carbon sequestration and to develop a monitoring protocol for use at the project level with a goal of increasing carbon storage consistently and quickly to address the urgency of our climate crisis. The Social Cost of Carbon and the Social Cost of Methane should be used in this analysis.
- [middot] Demonstrate how the GMUG will reduce fossil fuel emissions from operations on the Forest.
- [middot] Analyze the effects of prescribed fire and slash burning on the regional carbon budget
- [middot] Include plan components relevant to meeting agency direction of the National Roadmap for Responding to Climate Change

Recreation

As an organization committed to preserving and enhancing wildlife habitat and connectivity, Broads considers Alt D as the preferred alternative for balancing wildlife needs and recreation demands. Our recommendations for revisions to plan components follow:

- [middot] Given the sizeable acreage of alpine ecosystems across the GMUG and the dramatic increase in recreation use and deleterious impacts in recent years, OBJ-REC-04 must either reduce the number of years

from 10 to 3-5 to accomplish enhanced resiliency of 100 acres of alpine ecosystems or increase the number of acres to be enhanced over a 10-year period.

[middot] OBJ-REC-06 must either reduce the number of years from 10 to 2-5 for the

elimination of two unauthorized motorized travel routes or increase the number of routes to be decommissioned over 10 years while starting the process within one year of plan release.

[middot] Broads urges STND-REC-11 omit [ldquo]existing fire rings[rdquo] to read Campfires in alpine ecosystems shall only be permitted in fire pans.

[middot] Broads endorses two new standards for recreation recommended by BHA[rsquo]s Report: 1.) All classes of electric-assist bicycles (e-bikes) will be authorized on open roads and motorized trails only. 2.) Colorado Roadless Areas (MA3.1) and Wildlife Management Areas (MA3.2) will have minimal trail development or be managed for Primitive ROS.

[middot] The final plan must address Over the Snow Vehicles (OSVs) and must include relevant plan components that consider impacts to wildlife, sensitive areas, soils, and quiet, human-powered use.

[middot] GDL-REC-12 (prohibition of motorized use off designated routes) must be a standard.

[middot] CPW and diverse stakeholders recently spent years and resources revising the handbook Planning Trails with Wildlife in Mind. Broads believes it is imperative that this science-based document serve as a guide for all land management agencies and trail proponents. To that end, we urge the GMUG to include a guideline that states, [ldquo]All proposed trail development projects must abide by the scientifically supported guidelines and methodologies in the Planning Trails with Wildlife in Mind handbook when considering, designing and constructing trails.[rdquo]

[middot] The final draft should identify Recreation Emphasis Corridors by name, and

estimate length and width of the corridor allowing for variability in size based upon use and demand.

[middot] Broads supports the most restrictive plan components relevant to unmanned

aircraft systems (aka drones) due to their impacts on fauna (including avian species) and the disturbance to quite users. Even though the FAA has ruled that flying drones over people is safe, Broads believes that our public lands are for all users and the use of drones over visitors is intrusive and incompatible with a quality experience. We appreciate the prohibitions included in STDN-REC-09 and recommend addition of the following management areas to those prohibiting drones: existing and proposed (in Alt D) Special Management Areas, Colorado Roadless Areas, and Wildlife Management Areas. We appreciate the GMUG convening a special meeting to discuss drone use on the GMUG and plan components. Our participating member in that meeting took note of and was alarmed by the number of attendees from out of state advocating for less restrictive plan components related to drones. These individuals included commercial drone pilots and instructors, realtors, professional photographers, drone manufacturer and sales representatives, and for-profit business employees. Many of these attendees profit personally or represent corporations that profit from the use of drones. Many of them seemed to know each other and sit on advisory councils and boards together. It was disturbing that the discussion was dominated by drone advocates who do not live within or near the GMUG Forest region and stand to benefit financially from use in and over our national forests. Furthermore, Broads would contest that drone footage on social media has contributed to overuse and abuse of some scenic areas within the GMUG.

Priority Watersheds and Conservation Watershed Networks

Given that the GMUG contains 242 watersheds with 79 identified as Class 2 (and thankfully no Class 3!) the draft plan only identifying one priority watershed seems

under-ambitious. Headwaters within the GMUG boundaries are source water for multiple rivers ultimately flowing to the Colorado River. Our region relies on these watersheds for ecological services, ecosystem health, and water supplies for municipalities and agriculture. Surely, the GMUG can commit to restoration of more than one watershed in the final plan (regardless of the draft indicating additional priority watersheds will be identified during the life of the plan.) Broads strongly recommends revisiting the analysis of watersheds for identification of additional priority watershed to be included in the final draft. Please note that Broads supports the Watershed Conservation and Fen comments submitted November 8 by the Colorado Native Plant Society. Other suggestions for revisions to plan components include:

[middot] OBJ-SPEC-54 should require completion of two watershed plans within 5 years and a minimum of 4 within 10 years (doubling the goals in the draft plan.)

[middot] There exist no standards or guidelines in the Watersheds and Water Resources section of the draft plan. At a minimum, the management approach for incorporating the Watershed Conservation Practices Handbook and National Core Best Management Practices (p. 42) should be rewritten as a standard to ensure that best available science is applied consistently at the project level to protect watershed and water quality.

[middot] Riparian management zone (RMZ) STND-RMGH-07, needs to be strengthened. The minimum width should include wetlands less than one-quarter acre as it is

likely many wetlands on the GMUG are smaller than one-quarter acre. Furthermore, the 100-foot minimum buffer should be increased as evidence shows riparian habitats can be negatively impacted by activity beyond a 100-foot distance.

[middot] The GMUG should include specific plan components to reduce road density as well as limit road density in RMZs.

[middot] FW-OBJ-RMGD-06 needs strengthening by increasing the acreage (from 2500 acres) and streambank miles (from 15 miles) to be enhanced or restored within a 10-year period after plan approval OR the time frame for the acreage and streambank restoration must be reduced from 10 years to 3-5 years.

[middot] FW-OBJ-INFR-03 should set a goal of one action per year to be completed, rather than only five actions in a decade.

[middot] The 15% of subwatersheds in FW-OBJ-WTR-04 should be increase to 30-40%.

If the GMUG is serious about maintaining and enhancing watershed health and integrity, water quality and associated habitat, the plan must include more robust direction.

The draft forest plan identifies 12 sub-watersheds with high quality habitat and functionally intact ecosystems as Conservation Watersheds for protection of green- lineage Colorado River cutthroat trout or boreal toad. However, the only standard (FW- STND-SPEC-55) to protect Colorado River cutthroat trout is a limitation of ground- based

equipment within the streams or adjacent riparian areas during spawning and rearing periods, generally June through August. This standard is insufficient to protect sensitive spawning beds from sedimentation, which negatively impacts reproductive

success; FW-STND-SPEC-55 must be changed to prohibit operation of motorized vehicles and equipment both within streams and within RMZs year-round.

Beaver are a critical species related to riparian habitat health and water quality, and Broads appreciate the GMUG identifying beaver as a focal species in the monitoring section of the plan. However, the Monitoring section is weak. Broads supports the comments submitted by the conservation coalition/Matt Reed to which we have signed on and contributed. We specifically want to note the omission of green-lineage Colorado cutthroat trout as a focal species and the excessive time frames (10 years in many cases) to rectify concerns and the infrequency of monitoring. Since the purpose of the monitoring program is to assess ecological conditions, Broads also recommends the addition of the following species to the list of focal species with the associated plant community in parentheses: purple martin (aspen and snags/course wood), flammulated owl (ponderosa pine), and marten (late successional forest). This Monitoring section requires revision to be more timely, focused and robust if an adaptive management approach coupled with regular monitoring is to be effective in assessing ecological health and protecting landscapes and watersheds and the species that inhabit them.

Tribal Consultation and Cultural Resources

Broads has contacted GMUG staff via email and raised concerns during open houses and conservation coalition meetings with staff regarding what appears to be inconsistent and possibly minimal attention to Tribal Consultation. We recognize the challenges to engaging Tribal leaders and staff during the pandemic and the many barriers to effective communication including diverse world views and a history of colonization fraught with physical, psychological and cultural genocide, forcible removal and displacement of Indigenous communities, breaching of treaties, violence, and more.

Regardless of challenges, we encourage the USFS to make every [ldquo]reasonable and good faith[rddquo] effort as required by law to hold regular Tribal Consultations. Moreover, our organization supports Free, Prior and Informed Consent that affords Tribes greater decision-making authority and elevated rights. We have confirmation that at least one meeting took place on September 30, 2021 between Ute Mountain Ute[rdsquo]s Tribal Preservation Officer and GMUG staff. We sincerely hope and expect that the GMUG will facilitate continued dialogue, and more importantly, site visits with Tribal leaders and staff from all three Ute Tribes and will schedule regular, consistent communication throughout the planning process and into the future when analyzing future projects.

Broads believes strongly that traditional knowledge combined with western science will improve management of our public lands. We ask that Indigenous wisdom, knowledge and experience be integral to the final forest plan.

The plan components related to Cultural and Historic Resources (pages 42 & 43) are weak and inadequate. Broads suggests the following improvements and these are by no means exhaustive:

[middot] The 5-year window to meet two proposed objectives (FW-OBJ-CHR-02 and FW-

OBJ-CHR-03,) related to mapping the occurrences of the plant osha (*Ligusticum porteri*) and culturally significant locations, seems longer than needed given the

availability of existing data on these topics. The time frame should be reduced to 2-3 years for each objective.

* Indigenous communities have many uses for additional forest resources that are not addressed within the plan including but not limited to willow, herbs, and medicinals.

* The plan does not address Indigenous people's connection to place regardless of

specific identifiable structures or species visible on the landscape. Perhaps this notion is alluded to in the management approach (p.43) that prioritizes inventory of "Areas indicated to have high cultural value.; Areas of importance to traditional communities" but the references are vague and lack clarity of purpose and intent.

* The final management approach: "Identify, evaluate, and protect areas acknowledged as traditional cultural properties. Work with associated

communities to collaboratively plan management for these areas by developing programmatic agreements, memoranda of understanding, or other management tools." must be a standard.

Thank you again for receiving and considering these comments and working diligently to incorporate our recommendations into the final plan. Our members are passionate about preserving public lands for their intrinsic values, ecosystem services, and future generations. We are relying on you and the forest plan to achieve this overarching conservation goal.

Robyn Cascade, Peggy Lyon & Sallie Thoreson Northern San Juan chapter

Great Old Broads for Wilderness

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[Copied from attachment]

Chad Stewart, Forest Supervisor GMUG National Forest

2250 South Main Street Delta, CO 81416

Submitted via webpage: <https://cara.ecosystem-management.org/Public//CommentInput?Project=51806>

November 23, 2021

Thank you for the opportunity to comment on the GMUG draft Forest Plan and DEIS. Our Northern San Juan chapter of Great Old Broads for Wilderness (Broads) has engaged in this plan revision process from the outset submitting comments during scoping, the chapter 70 wilderness analysis & chapter 80 Wild & Scenic evaluation, and most recently, on the working draft in August 2019. Broads also has been an organizational partner to the coalition that submitted the Community Conservation Proposal (CCP.) We contributed to development of the CCP and support it in its entirety. Our chapter of over 300 supporters is volunteer-led and encompasses engaged members from Delta, Montrose, Ouray and San Miguel Counties. We are hunters and anglers, ranchers, wildlife watchers, citizen scientists, recreationists of all kinds, and business owners. Our national non-profit organization, with 40 chapters in 16 states, is dedicated to protection of wild lands and waters with a focus on preserving unfragmented habitat, enhancing biodiversity, and addressing climate change.

Management Areas

CORE Act designations

Thank you for recognizing within the draft plan the wilderness characteristics exemplified by the landscapes in the former San Juan Wilderness Act and currently being considered in Congress as part of the Colorado Outdoor Recreation and Economy (CORE) Act. We support the designation of these polygons as recommended wilderness. In addition, we strongly recommend your final draft plan include the Special Management Areas (SMAs) included in the CORE Act as SMAs in the final GMUG Forest plan including Liberty Bell East SMA and the portion of Sheep Mountain SMA that lies within the GMUG boundary. Omitting these SMAs in Alternative B (Alt B) undermines these polygons's value within the GMUG, the stakeholders who have worked tirelessly for over a decade to protect these lands, and the legislation championed by local and national elected officials since 2009.

Baldy Roadless Area Recommended Wilderness

Consistent with Alt D and the CCP, Broads supports the Baldy Roadless Area (RA) for recommended wilderness with summer and winter ROS settings of Primitive and Pristine respectively. We also agree with the GMUG's Alt D Scenic Integrity Objective (SIO) of Very High and your analysis (in both Alt B & D) that this RA is NOT suitable for timber. Designating the Baldy RA as recommended wilderness also adds lower elevation acreage to potential wilderness, which includes ecosystem types that are currently underrepresented in congressionally designated Colorado Wilderness Areas and the national Wilderness System. Finally the Baldy polygon is critical wildlife habitat for many species and a migration route for big game species traveling between summer and winter ranges. From the GMUG Colorado Roadless Rule document (August 2011): This area is critical bighorn sheep habitat and is actively managed for this species with extensive habitat improvements. The northern half includes potential lynx habitat. This area is a black bear summer and fall concentration area, elk winter range and winter concentration area, elk production area, and is mapped as mule deer winter and summer range, as well as Merriam's turkey overall range.

Though we appreciate Alt B's inclusion of Baldy RA as a Wildlife Management Area (WMA) (named High Mesa/Baldy in draft plan) we unequivocally support and prefer recommended wilderness status for this polygon. Note also that Ouray County and the Town of Ridgway support recommended wilderness for Baldy. Backcountry Hunters & Anglers' (BHA) report recommends Baldy as a Wildlife Management Area. https://www.backcountryhunters.org/wildlife_management_areas_-_gmug_report (Note: BHA generally does not comment on wilderness recommendations.)

Bear Creek Watershed Recommended Wilderness

Identifying the entire Bear Creek drainage in Ouray County as recommended wilderness is a top priority for Broads as proposed in the CCP, and gratefully, as acknowledged in Alt D. Alt B critically undervalues the natural qualities of this polygon. We agree with Alt D SIO of Very High and summer and winter ROS settings of Primitive and Pristine with the exception that Diamond Creek should be at least primitive (not semi-primitive, non-motorized as reflected in Alt D.) The semi-primitive non-motorized winter and summer ROS settings in Alt B are unacceptable and not representative of this polygon's natural values. The SIO rating in Alt B of High merely along the gorge and Moderate in the surrounding region coupled with the low ROS settings perhaps is a result of the limitations of map and data analysis when in fact personal observation with boots on the ground is required to appreciate the values and primitive qualities along the Bear Creek National Recreation Trail, off trail west of S. Fork of Bear Creek, and between Bear Creek Trail and Horsethief Trail/Cascade Pass (north of Bear Creek NRT.) The Bear Creek watershed is NOT suitable for timber and Broads opposes the GMUG's finding of suitable timber along New Horsethief Trail as reflected in Alt D. The determination of suitable timber within this polygon in Alt B is unreasonable and environmentally irresponsible given the inaccessibility of the area and the steep slopes. (See timber comments below.) The wildlife values described in our CCP narrative include connectivity/wildlife corridors, critical bighorn sheep production area, bighorn summer and winter range, elk winter concentration area and potential Canada lynx

habitat. Finally, the Colorado Natural Heritage Program (CNHP) Dexter Creek Potential Conservation Area (Moderate Biodiversity Significance) lies within the polygon, and CNHP has documented 2 occurrences of the state imperiled plant *Monardella odorotissima* (Mountain wild mint) G4/G5 S2 (D ranked) in the area. Ouray County and the Town of Ridgway support Bear Creek polygon as recommended wilderness.

It is noteworthy that Ouray Board of County Commissioners (BOCC) and Town of Ridgway have endorsed Bear Creek and Baldy RA as recommended wilderness. GMUG staff has repeatedly referenced the importance of

county support for any kind of land or water special management or designation. Ouray County and Town of Ridgway endorsement aligns with the CCP. As of November 2021, the CCP is endorsed in its entirety by four municipalities, 140 businesses and 504 individuals. Broads certainly hopes you will consider this broad base of support when finalizing the forest plan.

Hayden Mountain Special Interest Area (SIA)

All draft alternatives place the CCP's proposed Hayden Mountain Special Interest Area (SIA) in "general forest" management type, which does not reflect the significant wildlife, botanical, and geological values of this 10,000-acre polygon. Moreover, the plan does not provide a range of options for management of this landscape. It is noteworthy that BHA has recommended Hayden as a WMA in their Report linked above and the Outdoor Alliance GMUG Vision endorses the Hayden Mountain SIA. Previous Broads' comments and the CCP emphasize that the Barstow and Greyhound mine sites (along with the motorized access routes to the sites) are excluded from our SIA proposed polygon. The remainder of this vast landscape proposed and buffered from Black Bear Road, CR 361/Camp Bird Rd and Hwy 550 provides valuable wildlife habitat for Canada lynx, bighorn sheep, bear, elk, moose, deer, and cliff-nesting raptors among other species. In particular, we note the summer range for elk where our members regularly witness 60-70 cows with calves, the regular sighting of a small but growing population of moose (though sadly a calf died in a vehicular collision in December 2020) and the occurrence of the Tier 1 RBS-21 bighorn herd in the southern portion of the polygon around Senator Beck Basin. The proposed Hayden SIA also affords a significant corridor for north-south migration providing connectivity between the San Juan National Forest and the Weminuche Wilderness all the way to the Mount Sneffels Wilderness and the Uncompahgre Plateau. It also has value as linkage between the Uncompahgre Wilderness and the west side of Highway 550 and Mount Sneffels Wilderness as evinced by the occurrence of RBS-21 bighorn throughout the region. Furthermore, Hayden provides for seasonal elevation movement for numerous species. In 2017, CNHP identified four Potential Conservation Areas in the region all with Very High Biodiversity Significance (Imogene Pass, Ironton Park, Mineral Basin, & Ouray Canyons.) CNHP has also reported the occurrence of three globally and/or state imperiled plants in the polygon: New Mexican cliff fern (*Woodsia neomexicana*) G4/S2 (B ranked); Western polypody (*Polypodium hesperium*) G5/S1S2 (B ranked); and San Juan Draba (*Draba graminea*) G2/S2 (A ranked) as well as one plant association in the adjacent Ironton Fen identified as Dwarf birch/Sphagnum shrubland (*Betula glandulosa*/Sphagnum) G2/S2 (B ranked.) At a time of diminishing global and regional

biodiversity coupled with the threats of increased recreation impacts and climate change, the GMUG has both an opportunity and responsibility to protect this region for its species diversity, relatively unfragmented habitat, wildlife connectivity, and refugia potential. Broads advocates for Primitive ROS settings for both winter and summer. We would argue that the "less than 3 miles from motorized route" criteria for primitive rating should not apply to this landscape due to its natural values, and we note that other areas across the GMUG with Primitive settings are within 3 miles of motorized routes.

At an absolute minimum, we recommend winter and summer ROS of Primitive for at least the north section of the polygon at higher elevations (specifically between Richmond Trail and Neosha Trail above 11,000 feet,) and semi-primitive, non-motorized for the rest of the landscape. Similarly, we argue that Hayden warrants a SIO rating of Very High throughout, however at a minimum Hayden is deserving of Very High SIO in the higher elevations with a High rating for the remainder of the polygon. We want to remind the GMUG that the Hayden polygon (like Bear Creek) was part of the 1930s-era Uncompahgre Primitive Area, and as a result, not inventoried during the 1970s Roadless Area Review and Evaluation. Nor was it analyzed in the early 2000s during the Colorado Roadless Rule. Mining claims purchased by the Red Mountain Project and transferred to the

USFS have basically eliminated concerns regarding private inholdings that would pose conflicts with SIA status. As far as we can ascertain, the USFS has never inventoried this critical landscape for its ecological qualities. We argue that Hayden has [ldquo]fallen through the cracks[rdquo] in the inventory process. Maps and databases cannot accurately represent the values found within this polygon, and we strongly recommend the GMUG take a closer look at this proposed Hayden SIA by putting some staff on the ground to document natural resource values. The GMUG may also recall that the CCP initially proposed Hayden for recommended wilderness (as it meets the requirements for wilderness character) however after learning of one existing use that is incompatible with a wilderness designation, CCP changed its proposal to Hayden Mountain SIA. Therefore, [ldquo]general forest[rdquo] is an inappropriate management area for Hayden that could result in the sacrifice of critical wildlife habitat and sensitive botanical species, the loss of species diversity, and the degradation of scenic values. No acreage anywhere within the CCP[rsquo]s proposed Hayden SIA should be considered suitable for timber. The vast majority of the landscape has slopes greater than 40%. Under no circumstances should any disruption of soils occur on slopes above the Ironton Fen (regardless of slope angle.) Unstable soils could cause sediment deposition in the fen that would irreversibly damage that ecosystem. Broads opposes even the small area of suitable timber within the polygon included in Alt D. Hayden is representative of the landscapes that the GMUG could protect in the revised forest plan that would contribute toward President Biden[rsquo]s America the Beautiful executive order to preserve 30% of our nation[rsquo]s lands and waters by 2030. If a special designation is, in the opinion of the GMUG, untenable, then Hayden must, at a minimum, be managed as a Wildlife Management Area (consistent with BHA[rsquo]s recommendation.) According to our calculations, the current route density across the 10,400 acre proposed Hayden Mountain SIA polygon is 0.65 miles per square mile when using USFS recognized routes and 1.09 miles per square mile when including additional routes used by locals but not appearing on USFS maps. Certainly these metrics coupled with BHA and OA

support and the wildlife values described above would qualify the Hayden polygon as a WMA if not a SIA.

Mount Abram/Brown Mountain Scenic Special Interest Area

The Mount Abram Scenic SIA (and apologies to Abram Cutler for the misnaming of the peak in the original narrative) is valued for its scenic beauty and wildlife values. The summit and the adjacent Brown Mountain ridgeline that extends for three miles provide an iconic visual skyline treasured and photographed extensively by locals and visitors to Ouray County. Gray Copper Falls is a destination for hikers to enjoy its beauty. Critical habitat for Canada lynx and important moose habitat lie within this polygon. We support Semi-primitive, Non-motorized summer ROS settings. While a winter ROS of Semi- primitive, motorized within half mile of snowmobile routes is appropriate; the ridgeline of Brown and Abram and the area between FS Rd 884 and 878/876 should be Semi- primitive NON-motorized. We support a SIO of High, which is consistent with Alt D and the San Juan Skyway Corridor designation. None of the Abram/Brown SIA polygon should be considered suitable for timber for the same reasons outlined above for Hayden with an emphasis on protecting the viability of the Ironton Fen.

Turret Ridge, Little Cimarron, Faires/Soldier Creek Recommended Wilderness Broads also supports the addition of Turret Ridge, Little Cimarron, Faires/Soldier Creek polygons to the Uncompahgre Wilderness as proposed in the Gunnison Public Lands Initiative. Ouray County and the Town of Ridgway support recommended wilderness for these three landscapes, and CPW and BHA recommend these landscapes as WMAs.

All three are Colorado Roadless Areas. All three landscapes are important wildlife habitat and allow for seasonal migration of species from higher elevations to winter habitat. These parcels would also add underrepresented ecosystem types to the Colorado and national system being managed for wilderness characteristics. Turret Ridge is wild and rugged with no existing routes. It offers unmatched opportunity for solitude and primitive recreation available only to the adventurous foot traveler.

Colorado Roadless Rule document (August 2011) mentions habitat for black bear, mountain lion, turkey, mule deer, elk, moose, bighorn sheep and Canada lynx. The report even mentions potential habitat for wolverine! Sensitive species including boreal owl, northern goshawk, and American three-toed woodpecker depend upon the spruce/fir forest in this area. The nearby forks of the Cimarron River contain Colorado cutthroat trout. The geology dominated by pinnacle tufts and cliffs is unmatched in its scenic beauty and spectacular skyline. Turret Ridge unconditionally warrants recommended wilderness status. Both its winter and summer ROS settings should be Primitive (not semi-primitive motorized and semi-primitive non-motorized respectively, as reflected in Alt B & D.) Little Cimarron Roadless Area provides habitat for all the species identified above (with the exception of wolverine) as well as white-tailed ptarmigan. Moreover, CNHP has identified the Little Cimarron Potential Conservation Area (PCA) for its montane riparian habitats. Failes Creek/Soldier Creek Roadless Area also provides habitat for the majority of species listed above and offers bald eagle winter range as well. CNHP has identified the Big Blue Campground PCA for its

subalpine riparian willow carr. All three of these polygons would be easily managed as recommended wilderness given their shared boundaries with the existing Uncompahgre Wilderness.

Additional specific landscapes

Broads cites the following concerns:

[middot] No lands should be deemed suitable for timber along Nate Creek Trail (western edge of Cimarron Ridge Roadless Area) nor along the Dallas Trail (north of Sneffels Range and adjacent to Mount Sneffels Wilderness and Whitehouse Roadless Area (A majority of the Whitehouse RA is included in the CORE Act's Whitehouse Addition to the Mount Sneffels Wilderness.) Logging adjacent to these trails would severely impact recreational use and scenic values. The close proximity to Roadless Areas is also concerning.

[middot] Cimarron Ridge Roadless Area should be a WMA with a winter ROS of Semi-primitive Non-motorized.

[middot] Wilson Summit should have an SIO of Very High or at a minimum High (the latter consistent with Alt D.) The moderate rating in Alt B totally underestimates this scenic wonder!!

Wild & Scenic River Suitability Cow Creek and Tributaries

Broads whole-heartedly supports the GMUG's finding of Cow Creek and its tributaries -- Wildhorse Creek, Wetterhorn Creek, and Difficulty Creek - eligible as [ldquo]wild.[rdquo] We request that the final draft also recognize the geological, scenic, wildlife, and botanical ORVs for this segment. The presence of Tier 1 Rocky Mountain bighorn sheep (*Ovis Canadensis*), Black Swift (*Cypseloides niger*) and possibly boreal toad (*Bufo*

boreas boreas) is justification for a wildlife ORV. CNHP ranks Cow Creek as possessing Very High Biodiversity significance including excellent (A-ranked) occurrence of the globally imperiled (G2G3/S2S3) *Pseudotsuga menziesii*/*Paxistima myrsinites* lower montane forest and excellent (A-ranked) occurrences of the globally vulnerable (G3/S3) *Populus angustifolia* - *Picea pungens*/*Alnus incana* montane riparian forest as well as excellent (A-ranked) occurrences of common riparian communities. A fair (C-ranked) occurrence of the state rare (G4/S2) New Mexico cliff fern (*Woodsia neomexicana*) is also documented.

Roubideau Creek

Broads agrees with Roubideau Creek and its tributaries being found eligible as [ldquo]wild[rdquo] and that Roubideau has Scenic and Geologic ORVs. We recommend that this segment[rsquo]s Botanical, Wildlife and Heritage ORVs be recognized and included in the final draft. CNHP ranks Roubideau Creek as possessing Very High Biodiversity significance identifying excellent and good occurrences of plant communities, which are imperiled on a global scale, as well as the presence of the following species:

Montrose bladderpod (*Physaria vicina*) (G2S2) B-ranked; Colorado hookless cactus

(*Sclerocactus glaucus*) (G2G3/S2S3 and listed endangered) C-ranked; Grand Junction milkvetch (*Astragalus rafaensis*) (G2/S2S3) B-ranked; and long-flower cat's-eye (*Oreocarya longiflora*) (G3/S3) C-ranked. Botanical ORVs would contribute to protection of water flows necessary to preserve unique riparian areas and plant diversity. Wildlife ORV is supported by the presence of northern leopard frog (*Rana pipiens*) and desert bighorn (*Ovis canadensis nelsoni*) in the watershed as well as three warm water fish species: Roundtail Chub (*Gila robusta* G3/S2), Bluehead Sucker (*Catostomus discobolus*), and Flannelmouth Sucker (*Catostomus latipinnis*.) Broads is aware of references to a rock panel in the canyon that includes an inscription by explorer Juan Antonio Maria de Rivera from 1769 as well as a depiction of a bighorn sheep qualifying Roubideau Creek for Historic ORVs. We recommend the GMUG map this culturally significant site that has been nominated to the National Register of Historic Places. Finally, Broads also strongly recommends that the GMUG final draft be consistent with BLM[rsquo]s Resource Management Plan for Roubideau adopted in 2020.

Bear Creek

Bear Creek is a priority segment for Wild and Scenic River eligibility for Broads and exceeds the criteria required for eligibility as [ldquo]wild.[rdquo] Bear Creek is free-flowing along its entire length and is accessed only by a rugged trail. The scenery is spectacular with deep gorges, thundering waterfalls, dramatic cliffs and golden aspen in autumn qualifying Bear Creek for a Scenic ORV, which the GMUG recognizes in its Chapter 80 analysis. Geologic features including volcanic tuff pinnacles, iron-rich intrusions and fossilized ripple marks qualify this segment for Geologic ORV. Recently published research by Dr. Dave Gonzales, a geology professor at Fort Lewis College, provides evidence of an Eocene paleocanyon cut into the San Juan Formation volcanoclastics. (Gonzales et al. 2021.) In addition, the mineralized waters of South Fork of Bear Creek possess that aqua quality similar to the Little Colorado and Havasu Rivers. Our members are not aware of another example of this feature in the region. The Bear Creek National Recreation Trail (NRT) that climbs and follows the creek is undoubtedly river-related; Broads would argue that the NRT would not have been designated without the magnificence of cascading waterfalls, dramatic cliffs of the gorge, and sections of bubbling flow over massive boulders. Consequently, Bear Creek should be recognized as having Recreation ORV. Finally, Broads is concerned that Bear Creek was found eligible in the GMUG[rsquo]s 2005 Wild and Scenic Comprehensive Assessment, but not in the current draft forest plan. Although we acknowledge that the 2005 assessment was never adopted, still there is no evidence or explanation in the draft plan that conditions along this segment have changed diminishing Bear Creek[rsquo]s ORVs. We strongly support Bear Creek as Wild and Scenic River eligible and emphasize that Ouray County and the Town of Ridgway endorse this recommendation.

Broads appreciates your attention to the following comments regarding plan components and prescriptions.

Wildlife Management Areas (WMAs)

Broads is committed to preserving unfragmented wildlife habitat and wildlife corridors, and the management type called Wildlife Management Area makes an excellent addition to options for protecting specific areas for their wildlife values. Such protection cannot be overemphasized during these times of drought, wildfire, extinction trends, decreasing biodiversity, and increasing recreation use and abuse. Broads is grateful to Colorado Parks & Wildlife (CPW) for envisioning and proposing WMAs. We are aware that CPW's list of polygons worthy of WMA status covered 50% of the GMUG Forest.

This fact is a reality to be celebrated and embraced by land managers. Our forest possesses such exceptional quality wildlife habitat and should be managed to preserve and enhance these values as well as the ecosystem services afforded by these lands. However, instead of accepting and endorsing CPW's recommendation in the draft plan, the GMUG chose to select only half of CPW's proposed WMAs to include in the draft.

Our members value wildlife and venture onto public lands specifically with wildlife watching as a purpose. Furthermore, our organization participates in numerous wildlife community science projects to further understanding of species' populations and trends and to contribute to the databases available to researchers, decision-makers, land managers and the general public. We oppose the reduction of WMAs from 50% of the forest to 25%. We strongly recommend that the GMUG re-evaluate their decision and include more acreage as WMAs in the final plan as proposed by CPW - the state's wildlife experts. Broads is committed to the CCP, and wherever Alternative D's wilderness and SMA recommendations overlap with the WMAs identified in Alternative B, of course, we support the stronger management prescriptions that Alternative D's wilderness and SMA areas provide. Broads wholeheartedly supports the concept of WMAs and asks that this management type be retained in the final plan. We advocate that WMAs be more effectively protected and managed via addition or revision of the following plan components:

[middot] Broads supports the one-mile per square mile route density threshold in MA-

STND-WLDF-02 and wants to emphasize that generally new routes should be prohibited in these areas for non-emergency uses. It appears this standard does not apply to administrative routes, and therefore WMAs need an additional plan component, preferably a standard that reads: [ldquo]Construction of temporary roads in WMAs should be severely restricted and full closure and obstruction of all temporary roads immediately following use is required.[rdquo]

[middot] Guideline: [ldquo]Lower route densities will be retained in WMAs. Even in circumstances where a WMA has an existing route density less than 1

mile/square mile, consideration of additional routes within the WMA should be scrutinized.[rdquo]

[middot] Guideline: [ldquo]Preservation of 500-acre or more parcels that are devoid of routes in specific big game habitat are prioritized to ensure wildlife viability and meet desired condition MA-DC-WLDF-01.[rdquo]

[middot] Standard: [ldquo]Any vegetation treatment project proposed in a WMA must be solely

for the desired objective of improved wildlife habitat. Commercial timber harvesting is strictly prohibited in WMAs.[rdquo]

[middot] Standard: [ldquo]Any re-vegetation efforts in WMAs must use only native plants.[rdquo]

Finally, Appendix 12 references Zone of Influence with regard to MA-STND-WLDF-02 however the implications of the Zone of Influence are not clear as to preserving unfragmented habitat. Clarification is needed.

Imperiled Species and Species of Conservation Concern (SCC)

Much discussion has transpired before and during the comment period regarding the interpretation of SCC guidelines, and Broads thanks the GMUG for holding a special open house webinar to address concerns. We are in agreement with many other conservation and wildlife advocacy groups that numerous imperiled species are not on the GMUG[rsquo]s SCC list.

Forest Service Handbook FSH 1909.12 Land Management Planning Handbook Chapter 10 (page 38) under 12.52d [ndash] Species to Consider when Identifying Potential SCC states:

3. Species in the following categories should be considered:

- a. Species with status ranks of G/T3 or S1 or S2 on the NatureServe ranking system. See exhibit 01 for description of NatureServe Conservation Status Ranks.
- b. Species listed as threatened or endangered by relevant States, federally recognized Tribes, or Alaska Native Corporations.
- c. Species identified by Federal, State, federally recognized Tribes, or Alaska Native Corporations as a high priority for conservation.
- d. Species identified as species of conservation concern in adjoining National Forest System plan areas (including plan areas across regional boundaries).
- e. Species that have been petitioned for Federal listing and for which a positive [ldquo]90-day finding[rdquo] has been made.
- f. Species for which the best available scientific information indicates there is local conservation concern about the species' capability to persist over the long-term in the plan area due to:
 - (1) Significant threats, caused by stressors on and off the plan area, to populations or the ecological conditions

they depend upon (habitat). These threats include climate change.

- (2) Declining trends in populations or habitat in the plan area.
- (3) Restricted ranges (with corresponding narrow endemics, disjunct populations, or species at the edge of their range).
- (4) Low population numbers or restricted ecological conditions (habitat) within the plan area.

It appears the GMUG is relying solely on (f) above and deciding that a species needs to meet all four criteria in (f) to be considered a SCC. There is no indication above that (f) is intended to use [and] rather than [or] in that list of criteria. The DEIS neither justifies nor references the Regional Forester's justification for the requirement of a species to meet all four criteria for listing as a SCC. We would argue that, if a species meets even one, but certainly two or three, of the four criteria, then that species should be designated a SCC. Furthermore, for many species, the GMUG does not possess sufficient data to determine if a population is declining, and yet it appears insufficient data equates to [no declining trend] in the analysis. This illogical conclusion must be addressed in the final draft. Furthermore an objective must be added to update [historic] data (i.e. greater than 20 years old) within 5-10 years with perhaps a shorter timeframe for potentially imperiled species. Criteria (a) through (e) above are critical and any one of them alone would qualify a species for SCC. Therefore in keeping with these arguments above, we recommend that the following fauna species be added to the SCC list in the final plan: American marten, Rocky Mountain bighorn sheep, desert bighorn sheep, northern goshawk, boreal owl, flammulated owl, peregrine falcon, Lewis's woodpecker, black swift, white-tailed ptarmigan, western bumblebee, green-lineage Colorado cutthroat trout and several species of potentially imperiled bats including but not limited to little brown bat & Townsend's big-eared bat. Broads supports recommendations in CPW's letter of June 29, 2021 for additional species.

Given our organization's focus on the Ouray County region, we want to elevate, in particular, the urgency to list bighorn sheep as a SCC. As you are well aware, the RBS- 21 herd is a Tier 1 herd with little to no genetic introduction. This herd is extremely vulnerable to the transmission of a respiratory disease carried by domestic sheep and goats. There is valid justification for bighorn sheep qualifying as a SCC under the eligibility components (b,) (c,) and 3 of the 4 (f) criteria above. (b:) Colorado Parks and Wildlife (CPW) has designated bighorn sheep as Species of Greatest Conservation Need (SGCN) in the State Wildlife Action Plan (SWAP). (c:) Rio Grande National Forest (RGNF) (which borders the GMUG) has designated bighorn as SCC in their forest plan. Furthermore the Core Home Range of RBS-21 includes both the RGNF and the GMUG and bighorn do not recognized forest boundaries. The GMUG claims that bighorn do not qualify for SCC since they do not meet #3 of (f) above since bighorn in the GMUG are not at the edge of their range. However, we argue that bighorn need not meet all four criteria under (f) given their imperiled status AND that either (b) or (c) alone would qualify bighorn for the SCC list. When a species meets this many criteria in the FSH list, we find it irresponsible of the GMUG to omit bighorn from the SCC list. If given all this justification, the GMUG and Regional Forester are still unwilling to list bighorn sheep as a SCC, the most stringent plan components must be drafted to provide the greatest protection possible for bighorn. Broads supports the plan components in the comments submitted by CPW and Rocky Mountain Bighorn Society during the draft plan comment period.

STND-SPEC-13, requiring separation of bighorn sheep and domestic sheep must remain a standard. Nevertheless, draft plan components are insufficient to ensure effective separation. In reality, to guarantee

effective separation between domestic and bighorn sheep, domestic sheep grazing and trailing would need to be eliminated from upper Bear Creek and the Cow Creek tributaries as this entire area is bighorn range.

Furthermore, observations document bighorn forays of over 20 miles. Research has demonstrated that best management practices are NOT sufficient to guarantee effective separation. The most recent version (2012) of the Western Association of Fish and Wildlife Agency's Recommendations for Domestic Sheep and Goat Management in Wild Sheep Habitat states: "Effectiveness of management practices designed to reduce risk of association are not proven and therefore should not be solely relied upon to achieve effective separation."

As a result, Broads strongly recommends an additional standard: "The GMUG must employ quantitative risk analysis using the best available science (currently the Risk of Contact Model) when evaluating risk of contact between domestic and bighorn sheep and must utilize this data when considering permit renewals." The Risk of Contact Model was developed jointly by the USFS and BLM and represents the best available science to date for evaluating the risk of grazing domestic sheep in close proximity to wild sheep. Modeled annual contact rates, produced by Risk of Contact (ROC) analysis, that result in predicted disease intervals more frequent than considered allowable to maintain herd viability should result in closure of those high risk grazing allotments.

Regular ROC assessment and stringent application of the results to inform grazing permitting are critical to the viability of bighorn in our region.

Another standard should read: "Grazing permit renewals must undergo a NEPA process." Use of FLPMA for renewals to circumnavigate a public process is unacceptable. Broads is aware of grazing permits that have been automatically renewed for decades without a NEPA review.

Broads appreciates FW-STND-LSU-06 to not grant permits for requests for new apiaries within the GMUG boundary as such apiaries create competition for native bees/pollinators. We are pleased to learn from Project Eleven Hundred that there are currently no existing permits for apiaries on the GMUG.

Broads appreciates and supports the GMUG including an objective and standard (FW- OBJ-SPEC-04 and FW-STND-SPEC-05) to prevent bird entrapment through the use of vent screens on USFS facilities. This measure will help all populations of birds across the GMUG.

Broads finds it totally unacceptable that the draft plan weakens protections for the federally threatened Canada lynx. The spruce beetle outbreak radically altered lynx habitat on the GMUG diminishing quality habitat. The current 1983 plan has strong protections for what was once considered the best lynx habitat on the forest before the large-scale tree die-offs. However, the draft plan opens up what is now the best remaining habitat for lynx to significantly more logging, without any scientific justification. This unjustified impact to lynx must be rectified in the final plan. The draft also removes a key standard that protects lynx habitat from excessive timber harvesting and salvage logging. It allows salvage logging to exceed the existing 15% harvest limit within a Lynx Analysis Unit in a 10-year period. The standard protecting lynx habitat from logging must be restored and strengthened in the final plan. The remaining quality lynx habitat must be deemed unsuitable for timber in the final plan, and the

plan must consider the effects of current and future beetle infestation and climate change on this species. Connectivity of habitat is critical to this lynx recovery. Linkages across the landscape must be protected and management direction provided in a standard.

Vegetation management and motorized recreation should be limited in connectivity corridors. The first management approach for lynx on p. 35, to evaluate and update lynx

linkages, must be a standard and a time frame of 2-3 years must be associated with this standard.

Gunnison sage-grouse (GSG) is another federally threatened species whose portions of critical habitat have been found suitable for timber management in the draft plan. These acres should not be included in the suitable timber base since timber management is incompatible with management of this species. The plan requires the Forest, within 10 years, to identify and permanently or seasonally close redundant and illegal roads that are within 2 miles of known leks. Since there are only 15 known leks on the Forest, and this is a Federally threatened species, this objective should be accomplished within 1-2 years, not 10. OBJ-SPEC-38 should be a standard and closure and obstruction of redundant and unneeded routes within two miles of GSG leks should be accomplished as soon as possible and within less than 5 years. Another plan component should also require monitoring of habitat for new illegal routes. 230 miles of roads and motorized trails are located in occupied habitat and 164 miles in unoccupied habitat making the current route density in GSG habitat greater than the metric proposed for WMAs. This is unacceptable and route density must be reduced as soon as possible. OBJ-SPEC 40 regarding fencing in occupied GSG habitat should be elevated to a guideline and accomplished within 3 years of plan release (not 5.) GDL-SPEC 43 must be a standard for active leks, and the buffer for prohibition on surface disturbance must be greater than the draft plan's one-mile distance from leks. Given the literature review by Manier et al. (2014,) the recommended buffer for sage grouse generally is 4 miles, and Aldridge and Boyce claim 6 miles or greater is warranted for GSG in particular. Finally, adherence to the GSG Recovery Plan and Recovery Implementation Strategy must be a standard (rather than a management approach.)

OBJ-SPEC-54 and STND-SPEC-55 see Priority Watersheds and Conservation Watershed Networks below.

Regarding imperiled plant species and botanical SCCs, Broads is in agreement with and fully endorses the comments submitted by professional botanists Peggy Lyon and Gay Austin. Please refer to their submission for our comments on botanical species. We also fully support the Colorado Native Plant Society's submission dated November 8, 2021 that addresses plan components related to botanical values in the draft plan.

Suitable Timber

Alternatives B, C, & D in the draft plan all propose a significant increase in acreage beyond the current plan. We recognize that this increase is, in part, due to the 2012 Planning Rule; however Broads argues that the abundant acreage found suitable for timber is still excessive and jeopardizes carbon sequestration, soil health, wildlife habitat, biodiversity, water quality and the agency's mission of multiple use. We ask that the GMUG utilize the discretion within your authority to arrive at a more reasonable and realistic acreage of suitable timber in

the final draft. Moreover, the draft plan does not provide a reasonable range of alternatives given that all alternatives significantly exceed the no action alternative and the blended Alt B does not differ remarkably from the commodity/active management Alt C. Under no circumstances should slopes

greater than 40% be found suitable, and this restriction must be included in the plan as a standard. Though Broads recognizes that the 2012 Planning Rule does not require consideration of economic feasibility when evaluating suitability, we argue that finding as suitable those lands that cannot be harvested economically, or in some cases, that cannot realistically be harvested at all, leads to artificially inflated calculations for sustained yield limit, projected timber sale quantity, and projected wood sale quality.

Such metrics are therefore deceptive and could mislead 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. Please re-evaluate both your process and lands found suitable in the draft to generate a more authentic representation of lands suitable for timber in the final draft. Specific to Ouray County, please see comments above regarding specific landscapes (Baldy, Bear Creek, Hayden, Abram.) Note also that, due to recreation and scenic values, there should be no lands deemed suitable for timber along Nate Creek Trail (western edge of Cimarron Ridge Roadless Area) nor along the Dallas Trail (north of Sneffels Range and adjacent to Mount Sneffels Wilderness and Whitehouse Roadless Area. (Note: A majority of the Whitehouse RA is included in the CORE Act's Whitehouse Addition to the Mount Sneffels Wilderness.) Finally, all critical habitat and potential climate refugia for Gunnison Sage Grouse and Canada lynx, two federally threatened species, should be removed from acreage found suitable for timber.

Range and grazing

Broads finds it very disturbing that 80% or 2,382,269 acres of the GMUG is managed for livestock across 223 allotments. Though Broads and our conservation coalition commented on this topic during scoping, we were informed by the GMUG that a thorough review of the grazing program during this plan revision was not warranted. Broads recommends there be a preliminary determination of land suitable for livestock grazing at the forest plan level, just as there is for timber production. Suitability should be determined for capable rangeland, based on the management areas and forest-wide plan components. At a minimum, areas in and near populations of rare plants and habitat for bighorn sheep, Gunnison prairie dog and Gunnison sage grouse should be unsuitable for livestock grazing. Although rangeland condition has improved over the past two decades, 29 percent (more than 400,000 acres) of rangelands are in fair or poor condition. These metrics are unacceptable and must be addressed in the final draft with stronger plan components. Rangeland health has been a concern of our organization since its founding over 30 years ago. Many of our members are active hikers, backpackers and wildlife watchers. They often report erosion, overgrazing, and excessive feces due to livestock grazing where they recreate and camp in the backcountry. To that end, we recommend the following revisions to plan components:

* First, thank you for recognizing the critical need to preserve wildlife forage in DC- RNG-01.

* We appreciate the prohibition on salting in STND-RNG-06 and recommend

addition of Gunnison prairie dog habitat to the list of sensitive areas.

* STND-RNG-07 is very concerning as Broads does not consider livestock grazing as a strategy for rehabilitation treatment due to grazing's often deleterious effects on water quality, soil health, and biodiversity. Any use of livestock grazing as a

[treatment] should be extremely limited and allowed only following thorough review from range

conservation experts. We question the purpose and validity of this standard.

* Broads appreciates the GMUG's effort to limit utilization, however STND-RNG-08

misrepresents the definition of moderate utilization. Utilization over 50% is considered heavy grazing. Broads strongly recommends this standard limit grazing to 30% of current above-ground biomass and 25% under drought conditions. This conservative utilization of 30% (i.e. leaving 70% of the plant by weight) has been documented to be economically sound and ecologically beneficial. (Holechek et al. 2006.) Furthermore, STND-RNG-08 is undermined by the multiple exceptions referenced. If this standard is to be effective in its implementation on the ground, exceptions must be drastically reduced and only applied when substantiated by science and thoroughly reviewed by appropriate experts who have personally inspected the allotment under consideration.

* The following guidelines need to be standards as they are critical plan components to ensure ecological health of allotments and all relate back to our

organization's concerns re: erosion especially in riparian areas, overgrazing, excessive feces and preservation/enhancement of biodiversity: GDL-RNG-09, GDL-RNG-10 and GDL-RNG-11.

* The phrase "Watershed Conservation Practices Handbook should be followed" in

GDL-RNG-09 should be changed to "Watershed Conservation Practices Handbook must be followed."

Broads also strongly recommends addition of the following plan components:

* Objective: Within one year of plan approval, publish a list of processes available for public participation in livestock management decisions, and how concerns raised by the public will be processed. Currently to our knowledge, the GMUG does not provide the public with formal avenues for communication by which the public can expect a response to grazing problems observed or documented and submitted to the GMUG. Furthermore the GMUG provides no process for responding to suggestions from the public regarding better livestock management on public lands. We recognize the limited capacity of the Forest Service, and therefore strongly recommend that partner organizations and the public are provided with a clear, defined process to contribute information and can rely upon the GMUG's response and potential action commensurate with concerns.

* Objective: Within 2 years of plan approval, develop processes by which permittees may apply for (a) reduced use for conservation and restoration

purposes (while retaining existing permit numbers); and/or (b) voluntary closure of all or part of an allotment based on ecological values, location within wilderness, conflicts with other forest uses, and/or lack of sufficient production for economic sustainability. Permittees who might want to reduce their livestock use in response to conditions on the allotment for which they have a permit are reluctant to do so, in fear of being cited for not running cattle at near-permit limits or having their permit numbers reduced. Amid rising temperature and frequent below-normal precipitation, the current policies provide disincentives for

conservation and restoration by the permittee.

* Objective: Within 8 years of plan implementation, all Allotment Management Plans (AMPs) that are older than 10 years will be revised.

* Standard: All Allotment Management Plan (AMP) revisions will be completed with

NEPA Environmental Assessments or Environmental Impact Statements. Renewal of grazing permits and AMP revisions using FLPMA are prohibited. (See comments re: STND-SPEC-13 above.)

* Standard: Seeding of perennial, non-native species for forage is prohibited.

* Standard: Livestock Annual Operating Instructions must recommend non-lethal methods of avoiding predator depredations (e.g., guard dogs, portable electric fencing and fladry, herders, range riders, etc.), especially during high-risk time periods (e.g., calving/lambing).

* Standard: Predator control to protect livestock cannot be undertaken without documentation of the failure of predator avoidance efforts by livestock operators. There are well-developed and effective herd management methods that enhance co-existence between carnivores and livestock. See the organizations Working Circle <https://www.workingcircle.org> and Wood River Wolf Project <https://www.woodriverwolfproject.org>

* Standard: Livestock cannot enter a pasture for the season of use until permittee- maintained fences, water developments, and other livestock developments are in

functioning condition. Wherever fences are down (which is, unfortunately, frequent,) cattle wander into springs, neighboring allotments, or other areas where they are not authorized.

* Standard: Improvement to riparian ecosystem health will be achieved within 3-5

years of plan release by restricting or prohibiting livestock grazing in sensitive riparian areas. Livestock grazing can have significant impacts to riparian and wet meadow ecosystems. The current vegetation condition and ecological integrity of all wet meadow and riparian shrub and woodland ecosystems on the GMUG are moderately departed from reference conditions. Of particular concern is the cottonwood riparian ecosystem with significant departure in vegetative condition. The draft forest plan has no specific grazing standard to protect or restore these sensitive riparian and wetland areas.

Broads sees an obvious need for boots on the ground monitoring of allotments by USFS personnel or qualified volunteers (and like Broads commitment to solitude monitoring on the Ouray District, we would be more than willing to assist!) To that end, we suggest the following standard: Allotments in fair or poor conditions and those showing degradation over time must be surveyed/monitored every 2 years and improved range conditions must be achieved within 3 years of the survey.

Climate change

One of our national organization's three priorities is: "To make public lands part of the solution to climate change." Currently, if US public lands were a country, they would rank fifth among all nations for greenhouse gas emissions.

[Figure Excerpted from original letter]

Therefore, we consider the GMUG Forest plan revision an opportune time to address climate concerns with climate-relevant desired conditions and robust plan components. Broads appreciates that the GMUG has given some consideration to climate impacts and mitigating climate change in aspects of the draft plan, particularly the intent to identify refugia. However, we believe overall the plan is weak in its prescriptions and could be more specific, timely, and encompassing in its efforts to address climate concerns throughout the plan. By protecting more landscapes as recommended wilderness, special interest (or management) areas and WMAs as

suggested, in part, in Alternative D, the plan would contribute significantly to America the Beautiful (aka 30 X 30) initiative to protect 30% of US lands and waters by 2030. Given that the GMUG Forest is fortunate to possess within its boundary so many pristine ecosystems, relatively unfragmented habitats, wildlife corridors, and diverse elevation landscapes harboring biodiversity, the revised forest plan should protect as much acreage as possible with management areas and strong plan components to maintain or enhance natural values. It is long past time that the USFS prioritize ecological values and ecosystem services above corporate interests and recreation demands. The pressures for development will continue to exist and likely increase, nevertheless a planet that sustains life is of far greater value than one which elevates Gross Domestic Product.

To that end, we ask that the final plan:

- [middot] Maximize recommended wilderness, SIAs/SMAs and WMAs
- [middot] Identify climate refugia for protection in 2-5 years (rather than the 10-year timeline in the draft plan)
- [middot] Use the GMUG's discretion to re-evaluate the acreage deemed suitable for timber to include an analysis of carbon sequestration and impacts on water quality and quantity
- [middot] Thoroughly review the carbon storage potential of the GMUG and recognize carbon sequestration as a critical ecosystem service, develop a baseline for current carbon sequestration capacity and include plan components to require an analysis of emissions versus sequestration when evaluating future projects
- [middot] Consider the GMUG's significant role in ecosystem services including but not limited to the contribution to twenty-one water suppliers for domestic and agricultural use
- [middot] Apply the approach recently developed by Rocky Mountain Research Station scientists to estimate carbon stocks in rangeland (Reeves, 2020)
- [middot] Evaluate the grazing program within 5 years of plan release to determine the carbon budget of grazing across the GMUG
- [middot] Include management direction (and plan components) to increase carbon sequestration and to develop a monitoring protocol for use at the project level with a goal of increasing carbon storage consistently and quickly to address the urgency of our climate crisis. The Social Cost of Carbon and the Social Cost of Methane should be used in this analysis.
- [middot] Demonstrate how the GMUG will reduce fossil fuel emissions from operations on the Forest.
- [middot] Analyze the effects of prescribed fire and slash burning on the regional carbon budget
- [middot] Include plan components relevant to meeting agency direction of the National Roadmap for Responding to Climate Change

Recreation

As an organization committed to preserving and enhancing wildlife habitat and connectivity, Broads considers Alt D as the preferred alternative for balancing wildlife needs and recreation demands. Our recommendations for revisions to plan components follow:

[middot] Given the sizeable acreage of alpine ecosystems across the GMUG and the dramatic increase in recreation use and deleterious impacts in recent years, OBJ-REC-04 must either reduce the number of years from 10 to 3-5 to accomplish enhanced resiliency of 100 acres of alpine ecosystems or increase the number of acres to be enhanced over a 10-year period.

[middot] OBJ-REC-06 must either reduce the number of years from 10 to 2-5 for the

elimination of two unauthorized motorized travel routes or increase the number of routes to be decommissioned over 10 years while starting the process within one year of plan release.

[middot] Broads urges STND-REC-11 omit [ldquo]existing fire rings[rdquo] to read Campfires in alpine ecosystems shall only be permitted in fire pans.

[middot] Broads endorses two new standards for recreation recommended by BHA[rsquo]s Report: 1.) All classes of electric-assist bicycles (e-bikes) will be authorized on open roads and motorized trails only. 2.) Colorado Roadless Areas (MA3.1) and Wildlife Management Areas (MA3.2) will have minimal trail development or be managed for Primitive ROS.

[middot] The final plan must address Over the Snow Vehicles (OSVs) and must include relevant plan components that consider impacts to wildlife, sensitive areas, soils, and quiet, human-powered use.

[middot] GDL-REC-12 (prohibition of motorized use off designated routes) must be a standard.

[middot] CPW and diverse stakeholders recently spent years and resources revising the handbook Planning Trails with Wildlife in Mind. Broads believes it is imperative that this science-based document serve as a guide for all land management agencies and trail proponents. To that end, we urge the GMUG to include a guideline that states, [ldquo]All proposed trail development projects must abide by the scientifically supported guidelines and methodologies in the Planning Trails with Wildlife in Mind handbook when considering, designing and constructing trails.[rdquo]

[middot] The final draft should identify Recreation Emphasis Corridors by name, and

estimate length and width of the corridor allowing for variability in size based upon use and demand.

[middot] Broads supports the most restrictive plan components relevant to unmanned

aircraft systems (aka drones) due to their impacts on fauna (including avian species) and the disturbance to quiet users. Even though the FAA has ruled that flying drones over people is safe, Broads believes that our public lands are for all users and the use of drones over visitors is intrusive and incompatible with a quality experience. We appreciate the prohibitions included in STDN-REC-09 and recommend addition of the following management areas to those prohibiting drones: existing and proposed (in Alt D) Special Management Areas, Colorado Roadless Areas, and Wildlife Management Areas. We appreciate the GMUG convening a special meeting to discuss drone use on the GMUG and plan components. Our participating member in that meeting took note of and was alarmed by the number of attendees from out of state advocating for less restrictive plan components related to drones. These individuals included commercial drone pilots and instructors, realtors, professional photographers, drone manufacturer and sales representatives, and for-profit business employees. Many of these

attendees profit personally or represent corporations that profit from the use of drones. Many of them seemed to know each other and sit on advisory councils and boards together. It was disturbing that the discussion was dominated by drone advocates who do not live within or near the GMUG Forest region and stand to benefit financially from use in and over our national forests. Furthermore, Broads would contest that drone footage on social media has contributed to overuse and abuse of some scenic areas within the GMUG.

Priority Watersheds and Conservation Watershed Networks

Given that the GMUG contains 242 watersheds with 79 identified as Class 2 (and thankfully no Class 3!) the draft plan only identifying one priority watershed seems

under-ambitious. Headwaters within the GMUG boundaries are source water for multiple rivers ultimately flowing to the Colorado River. Our region relies on these watersheds for ecological services, ecosystem health, and water supplies for municipalities and agriculture. Surely, the GMUG can commit to restoration of more than one watershed in the final plan (regardless of the draft indicating additional priority watersheds will be identified during the life of the plan.) Broads strongly recommends revisiting the analysis of watersheds for identification of additional priority watershed to be included in the final draft. Please note that Broads supports the Watershed Conservation and Fen comments submitted November 8 by the Colorado Native Plant Society. Other suggestions for revisions to plan components include:

[middot] OBJ-SPEC-54 should require completion of two watershed plans within 5 years and a minimum of 4 within 10 years (doubling the goals in the draft plan.)

[middot] There exist no standards or guidelines in the Watersheds and Water Resources section of the draft plan. At a minimum, the management approach for incorporating the Watershed Conservation Practices Handbook and National Core Best Management Practices (p. 42) should be rewritten as a standard to ensure that best available science is applied consistently at the project level to protect watershed and water quality.

[middot] Riparian management zone (RMZ) STND-RMGH-07, needs to be strengthened. The minimum width should include wetlands less than one-quarter acre as it is

likely many wetlands on the GMUG are smaller than one-quarter acre. Furthermore, the 100-foot minimum buffer should be increased as evidence shows riparian habitats can be negatively impacted by activity beyond a 100-foot distance.

[middot] The GMUG should include specific plan components to reduce road density as well as limit road density in RMZs.

[middot] FW-OBJ-RMGD-06 needs strengthening by increasing the acreage (from 2500 acres) and streambank miles (from 15 miles) to be enhanced or restored within a 10-year period after plan approval OR the time frame for the acreage and streambank restoration must be reduced from 10 years to 3-5 years.

[middot] FW-OBJ-INFR-03 should set a goal of one action per year to be completed, rather than only five actions in a decade.

[middot] The 15% of subwatersheds in FW-OBJ-WTR-04 should be increase to 30-40%.

If the GMUG is serious about maintaining and enhancing watershed health and integrity, water quality and associated habitat, the plan must include more robust direction.

The draft forest plan identifies 12 sub-watersheds with high quality habitat and functionally intact ecosystems as Conservation Watersheds for protection of green-lineage Colorado River cutthroat trout or boreal toad. However, the only standard (FW- STND-SPEC-55) to protect Colorado River cutthroat trout is a limitation of ground-based equipment within the streams or adjacent riparian areas during spawning and rearing periods, generally June through August. This standard is insufficient to protect sensitive spawning beds from sedimentation, which negatively impacts reproductive

success; FW-STND-SPEC-55 must be changed to prohibit operation of motorized vehicles and equipment both within streams and within RMZs year-round.

Beaver are a critical species related to riparian habitat health and water quality, and Broads appreciate the GMUG identifying beaver as a focal species in the monitoring section of the plan. However, the Monitoring section is weak. Broads supports the comments submitted by the conservation coalition/Matt Reed to which we have signed on and contributed. We specifically want to note the omission of green-lineage Colorado cutthroat trout as a focal species and the excessive time frames (10 years in many cases) to rectify concerns and the infrequency of monitoring. Since the purpose of the monitoring program is to assess ecological conditions, Broads also recommends the addition of the following species to the list of focal species with the associated plant community in parentheses: purple martin (aspen and snags/course wood), flammulated owl (ponderosa pine), and marten (late successional forest). This Monitoring section requires revision to be more timely, focused and robust if an adaptive management approach coupled with regular monitoring is to be effective in assessing ecological health and protecting landscapes and watersheds and the species that inhabit them.

Tribal Consultation and Cultural Resources

Broads has contacted GMUG staff via email and raised concerns during open houses and conservation coalition meetings with staff regarding what appears to be inconsistent and possibly minimal attention to Tribal Consultation. We recognize the challenges to engaging Tribal leaders and staff during the pandemic and the many barriers to effective communication including diverse world views and a history of colonization fraught with physical, psychological and cultural genocide, forcible removal and displacement of Indigenous communities, breaching of treaties, violence, and more.

Regardless of challenges, we encourage the USFS to make every [ldquo]reasonable and good faith[rdquo] effort as required by law to hold regular Tribal Consultations. Moreover, our organization supports Free, Prior and Informed Consent that affords Tribes greater decision-making authority and elevated rights. We have confirmation that at least one meeting took place on September 30, 2021 between Ute Mountain Ute[rsquo]s Tribal Preservation Officer and GMUG staff. We sincerely hope and expect that the GMUG will facilitate continued dialogue, and more importantly, site visits with Tribal leaders and staff from all three Ute Tribes and will schedule regular, consistent communication throughout the planning process and into the future when analyzing future projects.

Broads believes strongly that traditional knowledge combined with western science will improve management of our public lands. We ask that Indigenous wisdom, knowledge and experience be integral to the final forest plan.

The plan components related to Cultural and Historic Resources (pages 42 & 43) are weak and inadequate. Broads suggests the following improvements and these are by no means exhaustive:

[middot] The 5-year window to meet two proposed objectives (FW-OBJ-CHR-02 and FW-

OBJ-CHR-03,) related to mapping the occurrences of the plant osha (*Ligusticum porteri*) and culturally significant locations, seems longer than needed given the

availability of existing data on these topics. The time frame should be reduced to 2-3 years for each objective.

* Indigenous communities have many uses for additional forest resources that are not addressed within the plan including but not limited to willow, herbs, and medicinals.

* The plan does not address Indigenous people's connection to place regardless of

specific identifiable structures or species visible on the landscape. Perhaps this notion is alluded to in the management approach (p.43) that prioritizes inventory of [ldquo]Areas indicated to have high cultural value.; Areas of importance to traditional communities[rdquo] but the references are vague and lack clarity of purpose and intent.

* The final management approach: [ldquo]Identify, evaluate, and protect areas acknowledged as traditional cultural properties. Work with associated

communities to collaboratively plan management for these areas by developing programmatic agreements, memoranda of understanding, or other management tools.[rdquo] must be a standard.

Thank you again for receiving and considering these comments and working diligently to incorporate our recommendations into the final plan. Our members are passionate about preserving public lands for their intrinsic values, ecosystem services, and future generations. We are relying on you and the forest plan to achieve this overarching conservation goal.

Robyn Cascade, Peggy Lyon & Sallie Thoreson Northern San Juan chapter

Great Old Broads for Wilderness

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