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Organization:

Title:

Comments: Please find my comments in the attached file
GMUG_DraftManagementPlan_Comments_AGallensky.pdf

[COMMENTS COPIED BELOW.]

November 26, 2021

Grand Mesa, Uncompahgre, and Gunnison National Forests Attn: Plan Revision Team

2250 Highway 50

Delta, CO 81416

Submitted via the Online Feedback Tool

Dear GMUG Planning Team,

Thank you for providing this opportunity to comment on the Draft Forest Plan and Draft Environmental Impact Statement documents. I appreciate how open you have been through this process and the extensive schedule of public meetings and webinar sessions.

I work as the Principal Conservation Geographer at the organization Rocky Mountain Wild and have provided GIS mapping and analysis services to the coalition of conservation organizations that created the Community Conservation Proposal. However, I am submitting these comments as an individual and not on behalf of any organization.

In my comments I address three topics:

[middot] Input from non-local forest visitors

[middot] Community Proposals for Recommended Wilderness and Special Management Areas

[middot] Climate and Biodiversity Crises

Input from Non-Local Forest Visitors

I live in Colorado's Front Range, in a suburb of Denver. I moved to the Colorado Front Range from the Eastern United States almost 30 years ago. Since I moved here, I have visited the GMUG National Forest many times and created amazing memories. I've camped near Telluride, hiked above Ouray, picnicked and enjoyed the fall foliage on the Grand Mesa. My typical summer road trips were cut short by the COVID pandemic in 2020, one of my favorite memories and the furthest I traveled from my home last year was to visit and picnic at the Taylor Reservoir.

Along with establishing my connection with the GMUG National Forest, I bring this up to discuss the importance

of non-local voices in Forest Planning. I appreciate the importance of listening to the voices of the people who live and work close to the forest. However, I want to also emphasize the importance of listening to the large number of people, like me, who may not live close to the forest but are regular visitors and who will be impacted by the management decisions you will make. For example, is not appropriate to ignore conservation-oriented input because of lack of support from County Commissioners. I urge you to listen to all local voices and not to discount the input from those of us from further away who enjoy the amazing landscape that you manage.

Community Proposals for Recommended Wilderness and Special Management Areas

I was disappointed that none of the alternatives in the Draft Environmental Impact Statement fully analyzed the Community Conservation Proposal for Recommended Wilderness and Special Management Areas. I worked closely with the individuals and organizations that crafted these recommendations. I observed first hand the close attention to detail in crafting the boundaries and I was personally involved with numerous revisions to ensure that the boundaries matched the on-the-ground conditions. I appreciate the creativity of defining Wildlife Management Areas to line up with the proposed boundaries in the Special Area Emphasis Alternative, that does not capture all of the management recommendations in the Community Conservation Proposal.

I was also disappointed that the recommendations from the Gunnison Public Lands Initiative (GPLI) were not incorporated into the Draft Plan. While I did not participate in the GPLI process, I have been extremely impressed by the this collaborative process and how it created a comprehensive vision for a large portion of public lands in Gunnison County that is supported by ten community groups representing diverse interests including ranching, water resources, motorized use, conservation, mountain biking, recreation, and hunting and angling.

I fully support the recommendations in the Community Conservation Proposal and the Gunnison Public Lands Initiative. These recommendations should be analyzed it in the Environmental Impact Statement and incorporated into the Final Management Plan.

Climate and Biodiversity Crises

The unprecedented impacts of climate change and the worldwide loss of biodiversity are a major challenge of our time. Fortunately, public lands such as the GMUG National Forest, if they are managed appropriately can play an important role in addressing both of these issues. I am glad that the Draft Management Plan includes specific desired conditions addressing ecosystem resilience and connectivity. However, I am disappointed that you are not being more proactive in this planning process to identify areas that are predicted to be resilient to climate change (climate refugia). The plan should support managing resilient refugia areas and connections between them to maintain the characteristics that will keep those lands healthy and resilient into the future.

I have created the following three maps to demonstrate the wide variety of research results that identify areas important to protect in the face of a changing climate to combat global warming through maintaining biomass and that are predicted to be important as resilient refugia and for connectivity. All of the maps show currently protected wilderness areas along with the outlines of areas in the Community Conservation and Gunnison Public Lands Initiative Proposals.

[middot] The Forest Biomass map on page 4 below shows data from the USDA Forest Service of areas across the GMUG region with moderate to high concentrations of biomass, a measure of carbon storage. I downloaded the biomass data shown on this map from <https://data.fs.usda.gov/geodata/rastergateway/biomass/> on 11/22/2021. This data is described in this article: J.A. Blackard, M.V. Finco, E.H. Helmer, G.R. Holden, M.L. Hoppus, D.M. Jacobs, A.J. Lister, G.G. Moisen, M.D. Nelson, R. Riemann, B. Ruefenacht, D. Salajanu, D.L. Weyermann, K.C. Winterberger, T.J. Brandeis, R.L. Czaplewski, R.E. McRoberts, P.L. Patterson, R.P. Tymcio, Mapping U.S. forest biomass using nationwide forest inventory data and moderate resolution information, Remote Sensing of Environment, Volume 112, Issue 4, 2008, Pages 1658- 1677, ISSN 0034-4257, <https://doi.org/10.1016/j.rse.2007.08.021>.

[middot] The Climate Refugia and Corridors map on page 5 below overlays areas of climate refugia and corridors that have been identified at The Center for Biological Diversity by a suite of different models. This

modeling is described in the article: Dreiss, L. M., Lacey, L. M., Weber, T. C., Delach, A., Niederman, T. E., & Malcom, J. W. (2021). Targeting current species ranges and carbon stocks fails to conserve biodiversity in a changing climate: opportunities to support climate adaptation under 30x30. bioRxiv.. In press.
<https://www.biorxiv.org/content/10.1101/2021.08.31.458416v1.full.pdf>

* The Resilient and Connected Network map on page 6 below shows a proposed conservation network, identified by The Nature Conservancy, of representative climate-resilient sites designed to sustain biodiversity and ecological functions into the future under a changing climate. I downloaded the Resilient and Connected Network data shown on this map from

<http://www.conservationgateway.org/ConservationPractices/ClimateChange/Pages/RCN-Downloads.aspx> on 11/26/2021. The modeling techniques used to create this Network are described in a number of reports by The Nature Conservancy including: Anderson, M.G., M. M. Clark, A. Olivero, and J. Prince. 2019. Resilient Sites and Connected Landscapes for Terrestrial Conservation in the Rocky Mountain and Southwest Desert Region. The Nature Conservancy, Eastern Conservation Science.

<https://tnc.app.box.com/s/cqz4dp69e34mptqml7anfr5ezy94hcyu>

If you have any questions about these comments, about the maps, or about the data shown on them, please feel free to contact me.

Sincerely, Alison Gallensky

Westminster, CO 80031

[MAP: The Forest Biomass]

[MAP: Climate Refugia and Corridors]

[MAP: Resilient and Connected Network]