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Comments: FW: [External Email]Fwd: Forest Plan Revision

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From: Mary Chapman <mmchapman3@gmail.com>

Date: Fri, Nov 26, 2021 at 11:04 AM

Subject: Forest Plan Revision

To: mary chapman <mmchapman3@gmail.com>

Please see attached.

[Copied from Attachment]

Dear Supervisor Stewart and Planning Team;

Thank you for providing individual, unaffiliated members of the public the opportunity to provide feedback on the release of the Draft Forest Plan. We also thank you for working with Delta County and other Counties individually. Since cofounding the Public Lands Partnership 25 years ago (defunct for four years now) the GMUG has become very adept at public involvement, adaptive management, and working with Counties. Therefore, County input should be elevated in importance among responses, including ours. After all, they are the only entities that represent ALL local residents.

We strongly support the Preferred Alternative, or alternative B. We especially appreciate the elevated role of grazing. It not only promotes the needs of healthy, sustainable public lands through holistic grazing, but promotes the agricultural open space, profitable ranching, including guide-and- outfitting as a significant component. The first two of these activities lead to regrowth and significant carbon sink. Delta County's modest tourism activity—modest when compared to most neighboring Counties—is NOT a significant driver in our local economy. More specific socio-economic data would show that. We also very much appreciate the elevated role of timbering in this Plan alternative, and like the fact the GMUG is using it to achieve multiple objectives ranging from creating better landscape mosaics, fire breaks, treating beetle kill, to benefiting local mills, haulers and processors. We have learned a lot about logging as a tool to help prevent erosion in the last decade, including erosion that can otherwise flood major river ways, municipality intakes and other water structures. Not least, properly done, these activities create healthier habitat for wildlife. In short, we believe this activity is recognized and employed for a myriad of uses that benefit the forests and our accepted contemporary tool in ecosystem management. We applaud the GMUG for turning this once political albatross into a contemporary tool for creating and maintaining forest health.

The preferred Alternative embodies broad multiple use of forest resources. This is still the most reasonable ecological, and economic answer to the needs of our environmental and community well being.

Tourism/recreation is part of this multiple use spectrum but should not be prioritized above unrestrained [ldquo]industrial tourism/recreation" bringing negative impacts to forest health and communities. Also, data such as that showing increased recreational use off the forest, is misleading. Much increased usage can be contributed to Covid and the desire to recreate outdoors where it is thought to be safer. This too is supported by research if one chooses to look. As a rural economist who has spent considerable time analyzing tourism for the Center for the New West, it is my strong belief that the entire document is weak, if not flat out inadequate in its analysis of tourism, the fastest growing segment of forest use. In fact, socioeconomics in general is very weak throughout the page document. Pieces of it are woven throughout, but the overall lack of transparent and understandable (not anecdotal) data is flat missing. This detracts from the overall quality of the document.

Three other general issues remain relevant to the whole of the Document. The inadequate treatment of water is the first to be addressed.

By every current account in 2021 and beyond, the Colorado River system is in crisis. The GMUG, being one of the major headwaters of National Forests on the Colorado River, should have a specific objective to be a leader in water quantity and quality management for multiple uses. One could argue that every management objective in the revised forest plan needs to be evaluated through the analytical prism of water quantity and quality. In this way watershed health is not "an objective" in the plan, it should be "The objective". Colorado law on prior appropriation of water rights and interstate Colorado River Compact law are critically important to this objective. They should not be sidelined in favor of the federal supremacy doctrine in a revised forest plan.

Adopting watershed health and water quantity /quality will hopefully lead to a forest plan with practical management considerations. For example, is the expansion of new wilderness management classifications helpful or harmful to water quantity and quality? Limiting forest management choices in designated or planned wilderness areas could be a major impediment to insuring water quantity and quality through the impact of wildfire on forest water systems. Conversely, expanding forest management through vegetative management can produce increased water quantity and quality. These are critical considerations for the next forest planning timeline.

The second issue is this, and it too applies to the overall Plan. In Delta County and throughout the region we now have numerous externally funded special purpose private organizations that coordinate messaging meant to impact the USFS to adopt their environmental ideology. They do not represent the majority of our regional population. But they loudly and aggressively represent their ideology and selected science facts related to forest management. And, when not getting their way, these groups often rely on litigation and federal court made forest management. These special purpose organizations do not generally collaborate with other community, business or other special purpose organizations who don't reflect their views. Common ground and consensus input into forest planning has therefore become a rarity. We realize you know this well, but would encourage you to give special attention to input that is diversely comprised and collaborative in nature. Collaboration seems to have begun to be a positive asset in some court cases.

The third general issue that applies to the whole of the forest plan is climate change. One fact that is certain, but ignored in the climate change discussions, is that natural forces are at work in climate change. Every modern ideological argument seems to forget that there are scientific factors at work in our forests that fall into the classification of "the natural range of variability" regarding forest health. Saving the polar bears, eradicating methane and red meat, and promoting electrical vehicles will not change the natural range of variability in our forests.

In concluding multiple broad multiple use of forest resources, as illustrated in Alternative A, is still the most reasonable ecological, and economic answer to the needs of our environment and community wellbeing.

We appreciate the opportunity to comment on the draft GMUG forest plan.

Dr. Mary Chapman,

Rural Resource Solutions

Co- founder Public Lands Partnership

Stephen Schrock

Delta County Resident

Co-founder Public Lands Partnership