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Comments: Objection/Comment on GMUG National Forests Plan

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I will begin by saying that this GMUG Forest Plan revision is far better than the Draft circulated previously. Many of the concerns I presented then are answered in a positive way - suggesting they must have been problematic for many others as well.

I am really glad to see that the climate crisis has moved more into the fore in this new iteration of the Plan, as a set of challenges to be actively addressed through management, rather than deferred until 'the science is better.' The 'Resistance, Resilience, Transition' model to guide management approaches found throughout the plan is a major improvement over the draft.

I am also glad to see the GMUG Forest Plan acknowledge the vital role of the GMUG NFs and their waters in the larger ecosystem(s) of the entire Colorado River Region (natural basin plus out-of-basin diversions) - up to 20 percent of the total water supply for 40 million people and 5.5 million acres of nationally important agricultural land flowing through and out of those forests. This was the source of most of my concerns with the Forest Plan Draft: I searched in vain for even a mention-by-name of the Colorado River, let alone any analysis of its present and future water supply - and the role of the GMUG forests in that supply.

This Final Plan, however, does much better in that regard - the waters of the GMUG are put into the context of the larger demands on the Colorado River (mentioned by name, several times!), and on the future of the river in a time of rising temperatures and declining snowpacks. A paragraph on the 'Sustainability of Water Resources' is an excellent addition to the Plan, one that could, perhaps should, lead to number of 'Management Approaches' - but doesn't seem to.

That leads to my 'objection,' which is not so much an objection as a plea, for the Forest Service to go 'back to basics' - back to the charge in the 1897 Organic Act 'that no national forest may be established except to improve and protect the forest, or to secure favorable conditions of water flows, and to furnish a continuous supply of timber.' Historically, and right up to and including the present Plan, the Forest Service has worked hard on 'furnishing a continuous supply of timber,' and it is good to see 'improving and protecting the forest' through ecosystem management as a primary goal.

But in the arid West - is the Forest Service really doing all it can in its management approaches - or doing much at all in a specific way - 'to secure favorable conditions of water flows'?

Back in the beginning, Gifford Pinchot fostered a 'myth' about forests and rivers, equating their relationship to the relationship between 'fathers and sons': 'no forests, no rivers.' This leads to statements like one in the Final Forest Plan: 'GMUG National Forests produce approximately 2.8 million acre-feet of water yield.' (Italics added)

The relationship between forests and the rivers that emerge from the forests is much more complex than that - is it not? The water in the GMUG forest boundaries is 'produced' from a snowpack that accumulates over the winter, above and in the forests. Before the water in the GMUG snowpack emerges as water in the Colorado River, it has to survive three powerful forces: the sun and the wind (which suck off as much a third of the snowpack through sublimation, vaporizing it before it even turns into water), and the thirst of the forests themselves. The forests do a lot to protect snow that accumulates below them from the sun and the wind, but snow caught on their branches is also mostly sublimated. And once the snow becomes water and soaks into the ground, the trees are heavy drinkers.

The question then becomes: What are the current management approaches doing to assure the optimal conditions of water flows, through and out of the forests? (Not the maximal flow, which would involve removing all

the trees, but optimal.) What do dense, over-mature stands that drink a lot but are still not healthy and are vulnerable to various infestations do to 'favorable conditions' for water flow? Can non-commercial and commercial thinnings of new stands be managed for 'favorable conditions of water flows' as well as 'a continuous supply of timber'? Or are there some 'either/or' decisions that need to be made there?

Admittedly, this is an area in which the science is sketchy. But could some test plots be done to test some ideas for increasing the quantity of water that makes it through the forests? The Department of Energy study at Rocky Mountain Biological Lab is engaged in - among other water-related studies - an in-depth, high-tech study of sublimation, both above and within the forests.

The Southern Rocky Mountains are not famous for the quality and sustainable quantity of the timber they are capable of producing. But roughly 90 percent of the water for the most over-used and stressed river system on the continent, if not the planet comes not from, but through the GMUG NFs. If there were ever a Forest Plan that ought to place a management emphasis and priority on 'securing favorable conditions for water flows,' it is this one.

As a freelance writer (and longtime lover of both these forests and the Colorado River), I write often on this topic, and if there are serious flaws in my thinking here, I would appreciate hearing about them, so I might write more fairly as well as passionately.

Thank you for reading this far.

(Signed copy attached)

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