

Data Submitted (UTC 11): 10/30/2023 6:00:00 AM

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Comments: [See Attachment]

USDA Forest Service, Rocky Mountain Region

Attn: Reviewing Officer/Regional Forester

C/O Director of Strategic Planning

2nd floor

1617 Cole Blvd. Building 17

Lakewood, CO 80401

Re: Grand Mesa, Uncompahgre, and Gunnison National Forests Plan Revision

Dear Objection Reviewing Officer,

Thank you for the opportunity to object to the GMUG Forest Plan Revision. I have several concerns with the preferred alternative, and am also happy with several other aspects.

Logging and Climate Change:

One of the aspects of the revised GMUG Forest Plan Revision that concerns me is the huge increase in acreage that is suitable for logging. Trees over 150 years old are the most beneficial for carbon sequestration and by increasing the availability of logging by 302,000 acres is unacceptable for this reason alone. Restocking with small trees often fails, and these smaller trees will not reach a size or age sufficient in enough time to combat climate change in a meaningful way. Intact soil and ecosystems sequester large amounts of carbon and with logging of almost any type, the ground is disturbed and the carbon released, increasing climate change. Forests that are alive are shady and cool, but after clearcutting the bare soil does not recover and these areas bake, increasing temperatures on the forest. [ldquo]The GMUG stores more than 125 million metric tons of carbon in its forests, wetlands, rangelands, and soils equivalent to the carbon emissions from 100 million passenger vehicles in one year. Carbon stored both in the GMUG and its harvested wood products helps to offset sources of carbon dioxide to the atmosphere, such as forest fires and fossil fuel emissions (page 3, GMUG Draft Record of Decision.) I disagree that harvested wood sequesters carbon, it releases it once a live tree is cut and processed. So to assist in the slowing of climate change, all live trees need to be preserved. The GMUG forest

has received \$20.8 million from the federal Inflation Reduction act for wildfire mitigation and supporting jobs in the forest industry. I believe the GMUG planning team focused on maximizing logging due to this and ignoring the long term effects on climate change, wildlife, recreation economies and the irreplaceable loss of our best asset, our forest.

The timber aspect of the plan does not follow the Biden Administration's recent Executive Order to identify, protect and conserve old growth and mature forests. There should be no logging until the inventory of old growth is complete.

The Draft Record of Decision states [Idquo]All alternatives adhere to the principles of multiple use and the sustained yield of goods and [bull] provide sustainable levels of products and services[rdquo] (page 46 Draft Record of Decision). This amount of available land for logging is absolutely not sustainable, approximately 1/3 of the total GMUG forest. This is far too much allocated to one stakeholder on the forest.

Many of the areas added as suitable for logging to the GMUG Forest Plan Preferred Alternative are unacceptable as well. Strand Hill, the area surrounding Pittsburg and Slate River headwaters, and areas of Mt Emmons are all unacceptable due to the incredibly negative impact on Crested Butte's tourist economy, which is based on beautiful views, pristine forests, mountain streams and outdoor activities. It is unacceptable that supplying unsustainable logging mill which employs around 100 people for a limited period of time (until the logs run out) would take precedence over a valley wide industry that drives the entire economy of Crested Butte and Marble, and much of Gunnison's economy as well. East Cement Mountain, the southern boundary lands next to the West Elk Wilderness, areas adjacent to Fossil Ridge Wilderness and SMA, Escalante, Robideau and McKenzie areas, and many areas of Taylor Park are also unsuitable due to the amount of wildlife that winters or summers in these places, or migrates through in spring and fall. Many of these places have prized hunting and tourism as well. Logging will negatively impact all wildlife habitat. All of these areas need to be greatly reduced or removed from the suitable logging inventory.

No areas of steep lands greater than 30 degrees should be logged unless carefully with Ponsse equipment so as to avoid damage to surrounding trees and groundcover, and erosion. No lands over 40 degree slopes should be logged at all. No lands adjacent to creeks, rivers, wetlands, or waterbodies should be suitable for logging. We need every water source to be protected as drought continues in Colorado year after year. The GMUG is a critical headwater of Colorado, more than 20% of the Colorado River Supply. (page 2 of Draft Record of Decision). Intact forest and ground cover shade waters and keep them intact. (page 8,9 of my previous comments address watershed protection.)

Historically the percentage of the GMUG that is affected by logging is small compared to effects of wildfire and insects (page 211, Final EIS volume 3 comments report.) However, if this amount of acreage of suitability for logging stands, it is possible we will lose so much more to logging. Combined with losses from fire and insects, we can't afford this. Also fire often affects regrowth in logged forests more than pristine forests and is more likely to burn catastrophically, even with beetle kill.

The plan can also be improved by not listing logging suitability in any lands that were inventoried as having high wilderness characteristics, nor lands adjacent to any current or proposed wilderness, nor in any important wildlife summer or winter habitat, or any migration corridors, nor on or near any important recreation or view shed areas. I also believe absolutely no live trees should be cut, and when cutting dead beetle kill the Ponsse method used on Monarch Pass as a test can only be used. The GMUG Forest needs to maximize carbon sequestration and storage in the forest and prioritize this over the logging industry. I respectfully disagree with Presiding Officer Stewart. I believe that there are absolutely no ecological benefits to logging forests, this is outdated management view based on maximizing logging in the GMUG. Intact forests protect climate, water, from soil erosion, wildlife

habitat. Logging could be properly applied around infrastructure and by thinning and clearing only dead trees to protect from wildfire. There is absolutely no sound science that logging prevents forest fires, actually regrowth is much more likely to burn catastrophically.

According to the Draft Record of Decision, page 41, climate change forecasts, adaptation, and mitigation are of critical interest to the public and agency. The Rocky Mountain Regional Climate Change Coordinator for the Forest Service USDA Forest Service consulted with national USFS climate change experts to update the carbon and climate portions of the final EIS and to better integrate currently identified climate adaptation tools into the revised plan. The plan revision team fully integrated tools from the 2022 USFS Climate Adaptation Plan. The plan revision team relied on best available climate vulnerability assessments for the Gunnison Basin[hellip], (page 41, Draft Record of decision.) I read this as best available science is required in plan, however I object to nearly doubling suitable timber as it is also a direct contradiction to this.

I previously commented on climate change and logging suitability in the initial comment period on page 1, 4 & 5 of my comments.

#### Wilderness and GPLI:

Wilderness is very important to me, and to many locals and visitors. Wilderness best protects our air, headwaters, wildlife habitat and protects against climate change. It best supports persistence and diversity of our native species, and I am very disappointed in the forest draft plan[rsquo]s to include such a small amount of suitable lands for wilderness. Only 46,000 acres are added to the revised plan as opposed to 261,000 acres found to have a high degree of wilderness characteristics suitable for wilderness in the 2018 inventory by the forest service. The Conservation Coalition recommended that 300,000 additional acres be recommended for wilderness, and several other citizen groups and counties support more wilderness, as they realize how important it is for the above reasons, and also because it is a major driver of the economy of many of the towns within the GMUG forest area. I object to the amount of lands suitable for wilderness that have been withheld, and believe all suitable acres should be recommended as wilderness and managed this way.

The GPLI represents hundreds of hours spent by a diverse group of local stockholders interested in the forest. It has been adjusted many times to include all groups who use or have interest in the forest, or live near it. A lack of inclusion of the GPLI[rsquo]s recommendation in the GMUG Forest Plans preferred alternative is concerning to me. I believe all the recommended areas for wilderness should be included as suitable and managed as wilderness. I believe this is the best way to protect our lands forever for their own sake and for the sake of generations to come who live and visit the GMUG area. I am glad to see some WMA[rsquo]s but prefer the simpler and stronger designation of wilderness in all areas possible.

The GMUG forest plan should reflect the local peoples and governments values and protect as much wilderness as possible by recommending all x acres for wilderness. I submitted comments on the GPLI and wilderness on pages 3,4,5. Please include the GPLI[rsquo]s recommendations in the final plan.