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First name: Pat

Last name: Stucker

Organization:

Title:

Comments: GMUG Forest Plan Supplemental Comments

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We respectfully thank the Forest Service for the opportunity to provide additional comment to the GMUG Forest Plan regarding Species, Air Quality, and Aquatic and Terrestrial Ecosystems. Our family has owned an original homestead in Hubbard Park in the Gunnison National Forest since the original US patent issued in 1914. We have been active in working with the Forest Service, the State of Colorado and others to protect, enhance and improve this region of the Forest for the last several decades.

While the Terrestrial Ecosystem report provides detailed explanation of timber management in the GMUG, we are concerned about plans for timber harvest in the spruce forests near Hubbard Park in an effort to stay ahead of the spruce beetle infestations. Any proposed timber management in this area should recognize the road-less nature of this area and require management prescriptions which minimize impacts to wildlife, terrestrials and fisheries, including mitigations for hard road closures with reseeded.

The Forest Service mentions Climate Change in both the terrestrial and aquatic reports as a driver of ecological stress. Predicted warmer and drier conditions will leave plant species more vulnerable to insect infestation. However, oil and gas exploration is still being considered and performed on the GMUG. This is an important contradiction. If the FS recognizes that climate change is a reality which certainly will negatively impact the landscape, The Forest Service should minimize the extraction of fossil fuels in favor of good forest management activities to promote a healthy forest. We challenge the GMUG to do a better job considering the possibilities of renewable energy sources. The Forest Service must make a concerted effort to provide guidance related to managing the forest for climate change. How will this subject be described in the new plan?

The aquatic ecosystem report cites several of the concerns that are mentioned in Trout Unlimited comments such as stream connectivity barriers by roads, culverts, and dams, developing and improving quality fisheries, more specifically as they relate to the health of the threatened Colorado River cutthroat trout. The report states that a revision made to the new plan would be to focus on the health of fish and amphibians rather than continuing to use the traditional techniques of monitoring macro-invertebrate species. Several people and organizations have mentioned that they would like to see more habitat improvement for stream fisheries.

Page 7 of the aquatic ecosystem report states that "there is no evidence to suggest that current or future land management other than human impacts will affect the amount of habitat available to cold-water fishes at the forest scale." Later, on the same page, the report says "Future management activities may impact stream and riparian habitat conditions in streams

supporting aquatic species. It is likely that stream habitat surveys will be prompted by project proposals that include management activities which may affect streams and riparian areas." These two statements seem contradictory. I would like to see language in the report regarding specific methods by which the Forest Service require mitigation measures to monitor and therefore minimize impacts to aquatic health or consider reducing the number of the "proposal" which would negatively impact aquatic and stream health.

The aquatic report also mentions that anthropogenic stressors on the GMUG include diversions created from ditches and reservoirs. Trout Unlimited has mentioned that they would like to see the Forest Service monitor structural barriers in a number of stream associated with Overland Reservoir due to their witnessing significant decline in trout habitat in the Hubbard Creek watershed. The Forest Service has monitored stream temperature in Hubbard Creek over several years. These records show water temperature rising, specifically from water management activities of The Overland Ditch Company diverting water out of several streams.

What actions will the Forest service implement to protect these fisheries and aquatic life?

The terrestrial species report identifies species that are of concern in the GMUG, their general habitat, and the

reasons for their importance. The species in the report that are relevant to the Hubbard Park area are: pine martin, fringed myotis bat, goshawk, and purple martin. There is a large concentration of pine martin, goshawk, and purple martin observations near the Hubbard Park area, and a substantial amount of fringed myotis habitat in the area. What are the specific monitoring activities which the Forest Service will implement to insure protection of these species and the surrounding habitat?

We strongly urge the Forest Service to protect non-roaded areas with concentration on sustained recreational use. It is our understanding that "Multiple-use" does not mean that all uses should be considered in all areas.

Thank you,
Pat Stucker