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First name: Bill

Last name: Day

Organization: Black Canyon Audubon

Title: Conservation chair

Comments: Our comments are pasted and attached. Thanks, Bill Day

Black Canyon Audubon Society

PO Box 387

Delta, CO. 81416

May 30, 2018

RE: GMUG Plan Revision Scoping

Dear GMUG planning team,

Thanks for the opportunity to comment on the scoping phase. Black Canyon Audubon Society has approximately 392 members, almost all of whom live in the GMUG area counties of Delta, Montrose, Gunnison, Ouray, San Miguel, San Juan and Hinsdale.

Our vision for the future of GMUG (p.1 of the Scoping document) includes the following:

*Conscious planning for future conditions, realizing that it may take different management to give us what we enjoyed in the past. This includes planning for new economies, future climate, changing kinds of and increasing volume of recreating visitors, and best available science. Non consumptive recreation, such as mountain biking, hiking, camping, wildlife viewing, hunting and fishing, are more important economically and less damaging than commercial logging or energy development.

*Conservation biology principles, such as maintaining large enough core areas, and connectivity or corridors between them. This has to be in all elevations and habitat types and on a large landscape scale. And it has to be planned for with conscious decisions, not just an afterthought, after other uses have gotten what they want. Motorized travel should be planned to minimize fragmentation of natural habitat.

*Management areas for special places in all elevations and habitat types. Preserving old growth or late serial stage vegetation, especially in places where it seems likely to persist in future climate scenarios, should be considered in this. Ms. Staley's analogy during the webinar, comparing management areas to county zoning was good.

*Minimize long-term deleterious and often irreversible damage and irretrievable losses to public lands, water quality, wildlife habitat, T&E species, and wilderness values by eliminating new coal and mineral extraction activities and the expansion of existing mines. To address damage from past mining activities, abandoned mine sites should be prioritized for clean up and reclamation. Areas of critical importance to wildlife, those containing significant cultural resources, and those with protected status should be considered as candidates for future mineral withdrawal and designated as no lease or NSO for oil & gas development.

Following are additional comments on the scoping document:

Part II: Key Needs for Change.

Under Adaptive Direction, P 3, 2nd bullet: This is good, especially the part "incorporates conservation biology principles."

Under Ecological Sustainability, P 4, 1st bullet is good, especially the idea of planning "at a landscape scale". The following bullet, "prefer reservoir expansion over new reservoir construction" is good.

The 4th bullet, now P 5, discussion of climate change is imperative.

Also under Sustainability, logging that might be beneficial, such as the Uncompahgre Mesas and CFLR, and

parts of SBEADMR, should be discussed differently from commercial logging that is damaging to other uses. Under Plant and Animal Communities, P 5, is good. The 2nd bullet discussion of "relatively unfragmented big game habitat"...."and other wildlife habitat" is especially important, and has to be planned. The 3rd bullet, regarding rare ecosystems could include other riparian (willows, beaver dams) areas and edges of climax or pure aspens and parks.

Management Areas. P 7, Special Areas and Unique Landscapes. This should include the Mule Park Important Bird Area, mentioned in the revised Management Areas Assessment. We consider this area of pure aspen and open parkland habitat to be the most unique and one of the most globally important areas in the GMUG. Please note that this area has support (attached to HCCA, TWS, et al. Citizens Proposal) from local, statewide, and national entities that are knowledgeable about it. This Special Interest Area, and others, should be managed as not suitable for commercial timber production or industrial oil and gas development, with no new motorized routes allowed. We are pasting below our letter to the HCCA/ TWS Citizens Proposal coalition, supporting the IBA.

We also want to express our support for the Citizens Proposal comments regarding timber and fire, climate and carbon, wildlife and ecosystems, and management areas submitted by the conservation coalition including HCCA, The Wilderness Society, Western Colorado Congress, Western Environmental Law Center, Defenders of Wildlife, Western Slope Conservation Center, and others.

Sincerely,

Bruce Ackerman, President
Bruceackermanaud@aol.com

Bill Day, Conservation Chair
Billday@paonia.com

Black Canyon Audubon Society
P.O. Box 387, Delta, CO 81416

May 27, 2018

Re: BCAS support for Mule Park IBA

Dear Mr. Reed,

We are writing to express Black Canyon Audubon's (BCAS) support for the inclusion of the Mule Park Important Bird Area into the citizens' proposal as a Special Interest Area, in the GMUG Forest Plan Revision.

BCAS represents approximately 393 members in seven western slope counties that include most of the GMUG area.

We have been interested in this area, and especially in the Western Purple Martins that live there, since about 2001-2002 when the Rocky Mountain Bird Observatory began monitoring the Purple Martins there. We have had several field trips to the area, and we consider it to be one of the most important and irreplaceable places in the GMUG.

In 2015 we worked with Audubon Rockies to have the area officially designated an Important Bird Area. While there are 56 IBAs in Colorado, only Mule Park and Rocky Mountain National Park include large areas of aspen habitat. And only Mule Park IBA has the genetically distinct Western Purple Martins. It is also important to numerous other wildlife species, including many other cavity nesting birds.

We support the Mule Park IBA's designation as a Special Interest Area with management that protects the aspens and adjoining open parkland from commercial logging, additional motorized routes, and energy development.

Sincerely,

Bruce Ackerman, President
Bruceackermanaud@aol.com

Bill Day, Conservation Chair
Billday@paonia.com