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Comments: GMUG Forest Plan Scoping Comments

Mountain Coal Company, LLC provides the following scoping comments on the GMUG Forest Plan.

* In general, throughout past GMUG Forest Planning processes and Planning Rule processes and continuing today, there appears to be a lack of understanding of what a Forest Plan does and does not do. There also continues to be a lack of understanding of the different uses and management of National Forest System lands as opposed to National Parks or National Monuments, for instance. As such, it is important to reiterate at each stage of the GMUG Forest Planning process what a Forest Plan is and isn't, and that the GMUG is a National Forest, not a National Park or Monument.

* While coal produced from the Somerset coalfield is mentioned as a commodity that contributes to the local economies and communities, the plan should ensure that the public is also informed that the coal and other mineral extraction provides millions of dollars in federal royalty and tax revenue to the federal state and local governments, and is not just a Forest use.

* As has been shown by more than 30 years of coal mining at West Elk Mine, coal mining activities and many other uses have and can continue to occur together, including livestock grazing, hunting, hiking, horseback riding and ATV use, even with temporary administratively closed roads. The MUSYA has been successfully applied in the management of this area of the Gunnison National Forest and should continue.

* It is stated that the current Forest Plan management direction for wildlife is outdated and that a more adaptive direction for wildlife management incorporating conservation biology principles would be better. This statement gives the impression that the "old" science of wildlife biology and management was flawed and that the GMUG has been doing it all wrong all these years. Management of wildlife, timber, etc. most certainly can be enhanced with the best available science, but need not discredit or ignore what has worked (when funded) for many years.

* An exception of more than 19,000 acres of Colorado Roadless Areas (CRA) exists within the Somerset coal fields of the Gunnison National Forest for the building and maintenance of temporary roads for coal mining activities within the exception area. The CRAs and the exception area are adjacent to and by all appearances the same as the "regular" Gunnison National Forest in the area of the West Elk Mine. The Forest Plan needs to ensure that there is a clear understanding of the activities authorized by the Roadless Rule within the exception area and that the Forest Plan cannot, does not, and should not change those authorized activities, nor expand CRAs further.

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