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Comments: Thank you for the opportunity to comment on the preliminary Grand Mesa, Uncompahgre, and Gunnison National Forest management plan. I am glad the USFS is considering ways to protect important natural resources like wildlife habitat, domestic and irrigation water, wild and scenic rivers, air quality, and recreation. In particular, I support the designation of recommended Wilderness areas and special recreation management areas as mentioned in the Community Conservation Proposal, as well as the Lamborn/Landsend area. These will preserve habitat connectivity, wildlife corridors, undeveloped open space, and recreation opportunities within our region.

I urge the USFS to consider including the Community Conservation Proposal as its preferred alternative in its Draft Forest Management Plan. The Community Conservation Proposal includes protections for wildlife, recreation, wilderness-quality lands, air, and water. It would preserve scenic viewsheds that local communities and economies depend upon. I have a vision for the future that embraces our natural resources instead of exploiting them, and I recommend the USFS consider when drafting a Forest Management Plan. The USFS must adopt a final plan that makes important wildlife habitat, recreation areas, and sensitive air, water, and viewsheds off-limits to energy development.

Management areas:
Unfortunately, almost the entirety of the Upper North Fork/east Grand Mesa falls into either General Forest or Colorado Roadless Management Area. The General Forest designation provides no additional protections for certain areas within the North Fork Valley that hold incredible scenic, wildlife, and wilderness values. In addition, the lack of prescription and emphasis on maximum agency flexibility sets a bad precedent for the future forest-wide oil and gas leasing analysis. Please include additional management area designations as proposed in the Community Conservation Proposal, specifically in the North Fork region, in the Draft EIS.

Recommended Wilderness - MA 1.2 (RECWLD)
Only 22,400 acres at most across the entire GMUG are recommended for wilderness, all of it in areas contained within the San Juan Wilderness bill. This ignores tens of thousands of acres that were recommended by the GMUG in 2006 in the last public revision process, as well as endeavors such as the Community Conservation Proposal. I would like to see the recommended Wilderness areas proposed by the Community Conservation Proposal included in the draft EIS. Personally, I'm most familiar with the Coal Mountain/Mt. Lamborn area (GMUG Wilderness Evaluation rated this as HIGH in Wilderness characteristics); Electric Mountain Roadless Area; Chalk Mt and Elk Park area; Munsey Ruby Stock Trail area.

Colorado Roadless Areas - MA 3.1 (CRA)
The plan creates Management Area 3.1, which integrates the Colorado Roadless Rule's direction into the draft revised plan. However, there is only one desired condition, and no standards. In addition, it is not clear how well almost 197,000 acres of roadless lands will be protected under the Wildlife Management Area designation where the two overlap. More plan components are needed in the draft EIS for the Wildlife Management Area to ensure roadless lands are protected, as required by the Colorado Roadless Rule.

Wildlife Management Area - MA 3.2 (WLDF)
The Working Draft only specifies one desired condition and one standard for wildlife management areas on the GMUG. It is unclear, when looking at the Working Draft, how specifically Wildlife Management Areas will be managed for the wildlife within them, apart from road and trail density. Furthermore, more Wildlife Management Areas should be included in the draft EIS, specifically in the North Fork region, to protect the critical wildlife

habitat and range, as well as recreation opportunities in Game Units 411, 52, 521, 52, and 54, which are major economic drivers for our community.

Water, Watersheds, and Aquatic Species:
The plan proposes to establish conservation watershed networks to protect watersheds and sensitive species like trout and boreal toad, but provides no detail on how these networks would be applied and maintained. I like the concept of conservation watershed networks, which have "high-quality habitat and functionally intact ecosystems that contribute to and enhance conservation and recovery of specific target species". However, without more plan components, especially standards, it is hard to see how such networks will be maintained to achieve this desired condition. Furthermore, I appreciate the GMUG Planning Team for including an updated definition on Riparian Management Zones, however a clearer definition of what is and what isn't allowed within each zone is needed.

Wildlife
Wildlife Management areas must have specific guidelines for managing those areas specifically for wildlife, not just for managing trail densities within them. Despite our recommendations in the Community Conservation Proposal, no special management areas were included in the Working draft in the North Fork Valley. Big game habitat connectivity guidelines are included in the Working Draft, but no management areas are proposed to foster connectivity within the North Fork Valley watershed. The Working Draft only creates standards for domestic and bighorn sheep, with no objectives or guidelines for wildlife corridors on the Forests. Guidelines for protecting big game (deer, elk, bighorn sheep) on calving grounds and winter range are voluntary in the Working Draft, and they need to be mandatory. The Working Draft also allows for timber harvest in high-probable Canada Lynx use areas, which cannot be allowed, and seems to contradict it's desired condition for the species.

Timber
Approximately 971,000 acres of land on the Forests have been identified as suitable for timber production in the Working Draft Forest Plan. It appears that about 100,000 more acres would be suitable for timber harvest under this plan versus the 1991 amended plan. The suitability of an area should be informed by previous timber harvests or economic feasibility. This means more timber could be cut during the life of the new plan, creating more disturbances within our natural forested areas and may cause ecosystem harm at the expense of letting timber companies have more range throughout the forest. The plan also allows for 100 acre clear cuts of aspen stands on the Forests, which can have larger impacts on wildlife habitat and food availability, and is also way above the 40 acres allowed for all other species of trees. This has little benefit other than to allow timber companies free range throughout the forest.

Recreation
Thank you for taking the time to include the High Use Recreation Management Area within the Working Draft of the GMUG Forest Plan. However, I feel that Kebler Pass receives enough daily use to be included as a priority area. Also, the Recreation Opportunity Spectrum for the Summer and Winter range in the North Fork Valley should be changed to manage more for non-motorized primitive recreation throughout the Forests, due to the impacts that motorized recreation has on the landscape such as soil loss, vegetation disturbance, and more widespread effects on wildlife. The Summer ROS Spectrum would manage a significant portion of the northern Gunnison NF and eastern Grand Mesa NF for increased motorized recreation, which is not adequate for what is happening currently on the ground. The Winter ROS Spectrum would manage the Lamborn and Landsend Peak area for non-motorized recreation, which is a good addition to the Forest Plan, and additional protections for these areas should be included in the draft Forest Plan. Furthermore, recreational impacts on wildlife should be considered within the Recreation Opportunity Spectrum. Outdoor recreation in general, including both non-motorized and motorized recreation, can have negative impacts on wildlife. Outside of the recreation emphasis areas as noted in FW-DC-REC-02, wildlife impacts should be considered and monitored through the life of the plan.

I want to thank the GMUG Forest Planning team for releasing a Working Draft of the Forest Plan revision, however some changes are needed. Most importantly, more management area protections are needed for the incredible wildlife, wilderness, water quality, and recreation values the GMUG National Forests provide surrounding the North Fork Valley. Our community survives based on the values encompassed within the National Forests that surround us, and our ability to access those public lands. I would like those values to be protected in the GMUG Forest Plan.