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Comments:

Thank you for the opportunity to comment on the working draft of the revised GMUG forest plan. I do appreciate the willingness of the GMUG staff to listen to the concerns and thoughts of members of the public related to the forest planning process and direction. Let me just say that I support the information and proposals contained within the Community Conservation Proposal and wish more of the content it contains was reflected in the working draft proposal.

It seems to me that the draft is woefully inadequate when supporting wilderness designation for areas that qualify as wilderness. A number of the areas that received wilderness recommendation in the 2006 plan as well as other documented endeavors such as the Community Conservation Proposal are not recommended now. I see no reason to not proceed with wilderness designation for Kelso and Unaweep as both areas in their present condition clearly meet the required characteristics.

The areas that the draft describes as qualifying for wilderness designation are all contained within the San Juan Wilderness area. Wilderness lands are one end of a continuum of land classification. Wilderness lands protect to a greater degree the natural state of the land, protect biodiversity of all living beings within a land area, and give scientists and trained staff a representation of what might occur on the lands when they are not impacted by humans. To not have wilderness designated areas within the Grand Mesa, Gunnison and Uncompahgre plateau region of the forests means that there is no naturally occurring end point to measure against in examining land health for the majority of the GMUG forests.

Colo. Roadless area (MA3.1) is described in the plan, but there are no standards that would guide maintaining that status. 197,000 acres are to be protected with wildlife management area designation, but again there are few if any standard to ensure protection and demonstrate if conditions are such to meet the designation. It is unclear what the process was for identifying these areas and what the guidelines are for successful management of them.

On pg. 19 and 20 STAD- RMGO-19, GDL-RMGO, GDL-RMGD-12 and GDL-RMGD-20 should all be Standard which would provide measurable criteria to protect riparian areas.

GDL-IVSP-05 should be a Standard because reseeding the first year after a disturbance greatly enhances the possibility that native plants will be reestablished -- rather than invasive weeds.

Native Species Diversity needs Standards to set mandatory practices to protect bird species, big game, boreal toads, Canada lynx and native plant species. It took me quite a while to find information related to Gunnison Sage Grouse. After reading what I did find, it seems there needs to be a Standard that could be used to reflect the success or failure at maintaining and growing a larger population of the Gunnison sage grouse.

Watersheds - Watershed protection is a paramount concern and needs Standards to maintain the clear water that supports life. While I greatly appreciate the intent to provide protection and conservation of watershed networks, without Standard to measure I don't believe it can be done. The national forests are a source of clean water which is essential for everyone, for all beings. A watershed of particular concern for me as I live in Grand Junction is the Kannah Creek drainage. That area is designated as a wildlife management area which certainly is needed, but I didn't find guidelines or Standards to reflect maintenance of the high level of water quality which is now found within the drainage area.

Climate change direction is almost non-existent in the draft. What I had hoped to find were strong recommendations that would address the effects of climate changes on the forest and rangeland, plant and animal species.

Monitoring - As you well know the only way to determine if conditions in the forest are meeting guidelines or

Standards is to monitor those conditions regularly. The draft seems to have very little mention of needed monitoring . I hope additional description for monitoring protocol and frequency will be added.

I do appreciate the opportunity to comment on the working draft, am grateful for the information I obtained at the open house, and for conversation with several staff members which helped me gain more understanding of the intent of this document.