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Comments: Dear GMUG,

Thank you for the opportunity to comment on the GMUG Working Draft of the Forest Plan. I have several specific comments.

1)Regarding the Riparian Management Zones and Groundwater-Dependent Ecosystems, please consider including mandated language:

a.Regarding FW-GDL-RMGD-12, indicate that refueling activities, equipment storage, etc. shall be located outside of the riparian management zones. This is imperative. Of all the immediate dangers that can happen to aquatic systems and the associated riparian areas, toxins, gasoline, spills, compaction from equipment are paramount. These impacts should be kept out of riparian impacts. If equipment must cross riparian areas, wetlands, etc. mats and other appropriate methods shall be used to work in these areas.

b.Regarding, FW-GDL-RMGD-13, temporary incident management facilities shall be located outside the riparian management zones.... And when no practical alternative exists, all appropriate measures shall be used.

c.Regarding, FW-GDL-RMGD-15, please include the word "filling" in your list of impacts to avoid in fens and wetlands. Discharge of fill material to fens and wetlands, in many cases, requires permitting through the Clean Water Act. By not including the word "filling" the forest plan dismisses adherence to the Clean Water Act.

2)Regarding Aquatic Systems, please include mandate language in the following:

a.Regarding FW-GDL-AQTC-07, to maintain stream channel stability.... large wood shall not be cut or removed. Large woody debris is critical to the structure and function of stream systems and should not be removed.

3)Regarding Invasive Species, please include mandate language in the following:

a.Regarding FW-GDL-IVSP-05, it is important to reseed with a mixture of plant species native to the context area, but the native mix should not be so exclusive to make it impossible to seed the area as soon as possible. Leaving bare ground is worse than ensuring a plant seed mix that represents the immediate area eco-type. In other words, get something on the ground immediately to prevent invasives.

4)Regarding Enhancement Emphasis Areas, please consider the following:

a.Regarding FW-GDL-FFM-04, consider reconciling the average of less than 2 snags per acre with the needs of wildlife and terrestrial vegetation. This guideline appears to be in conflict with maintaining wildlife needs. See FW-GDL-SPEC-13.

5)Regarding Native Species Diversity, please consider the following mandate language:

a.For FW-GDL-SPEC-10, include.... pesticides shall prevent population-level impacts to pollinators. Our pollinators are important for food production, our local wildflower production, research and general ecosystem health. Use of pesticides must be carefully considered.

6)Please consider adding to Soil Resources under guidelines:

a.To reduce impacts to hydric soils when permitted to work (fill, excavate, etc), pads for moving heavy equipment across wetlands shall be required. Compaction and damage to hydric soils can be avoided by using mats.

7)Under Part III, FW-OBJ-CHR-04, please change Ligusticum porter to Ligusticum porteri.

Darn spell catcher. This is a very interesting objective, worthy of a student project, and would constitute a huge project.

8)Regarding Range, please consider adding the following in:

a.For FW-GDL-RNG-08 add range riding as a means of preventing concentrated livestock use in riparian management zones. Ranchers should be out there every day moving cattle out of riparian areas to uplands,

where there can be abundance of forage that is under-utilized.

b. For FW-GDL-RNG-11 include bighorn sheep in the last sentence. It might not make sense here, but efforts shall be made to separate domestic sheep from bighorn sheep on GMUG forest lands. Currently, separation of domestic and bighorn sheep on BLM lands is an issue. The GMUG should be pro-active ensuring that overlap of the sheep species does not occur. See proposed monitoring program, adaptive management actions on p. 71 of Forest Plan.

9) Regarding Timber and Other Forest Products, why mandate a maximum limit on opening size of 40 acres when there are so many caveats. Must the 40-acre minimum be the standard, and instead state that even-aged management (clearcutting) does not occur unless..... followed by the caveats. Timber cuts are necessary as are wildfires as are benign management, and must be reviewed site specifically as presented in Appendix 8.

I also want provide specific comments regarding two areas south of the West Elk Wilderness that include Beaver Creek (West Beaver Creek trail area) and the Sunspot or Sun Park area. The Beaver Creek Area north of the Gunnison State Wildlife Area is primitive, supports a single tract trail above the dam built to separate native trout from other fish species. This is an area that provides a primitive experience and the area should be addition to the West Elk Wilderness. The boundary should exist from rim to rim and extend south from April Gulch to the FS boundary. No logging should occur here, but trail maintenance is a must. Dead standing timber is a problem, but should not be cleared except of trail maintenance.

I don't support logging in the Sunspot area, and I indicated that on one of the comment sheets, though I did not clarify why. This area, if I can understand the map correctly, supports trails and has scenic qualities. Though standing dead trees are a problem, this area should remain as is.

Thanks again for the chance to comment.