

Data Submitted (UTC 11): 7/30/2019 12:43:15 AM

First name: Mary

Last name: Crowe Costello

Organization:

Title:

Comments: Dear Planning Team,

Thank you for the opportunity to comment on the working draft of the GMUG Forest Plan.

Below are some suggestions related to the protection of habitat, birds, and other wildlife, which I think should be a priority in the new plan, especially given the impacts of climate change.

### 1. Water Rights

Has the Forest filed for water rights in all watersheds, especially those key to fisheries, where there are no existing water rights? If not, other users such as mining companies may preempt the Forest from doing so. This should be a priority as demand for public water use increases with long-term drought. Water in our national forests should be prioritized for wildlife especially with climate change, and much is already being diverted for other uses.

### 2. Grazing

Cattle and sheep have deleterious impacts on habitat and water resources for birds and other wildlife. What plans does the forest have for recovering degraded soil, water, and vegetation? Grazing permit retirement should be a part of the new GMUG management plan.

### 3. Maintaining Biological Diversity and Viable Populations

The National Forest Management Act (NFMA) mandates are designed to provide for the diversity of plant and animal communities and maintain viable populations of native and desirable non-native plants and animals on national forest lands. Also, the Endangered Species Act established the conservation of individual threatened and endangered species and their critical habitats as national priority.

Habitats that add substantially to wildlife diversity are those with greater abundance of wildlife species; unique, obligatory faunas or specialized wildlife species; limited, disjunct, or shrinking distributions; and threatened, endangered, or sensitive species. In the Rocky Mountain Region, those habitats are wetlands, riparian woodlands and shrublands, aspen forests, pinyon-juniper woodlands, pure and mixed forests of ponderosa pine, and late-successional stages of other habitats (subalpine spruce-fir, and Douglas-fir). These habitats should receive conservation priority in the new GMUG plan.

Old growth harvest, forest fragmentation, structural simplification of clearcut stands, and snag removal can reduce the value of forests for birds and other wildlife and should be avoided.

A goal of the new plan should be increasing connectivity to manage biodiversity in response to climate change. Maintaining or improving the linkages between conservation areas provides the best opportunity for the natural adaptation of species and communities that will respond to climate change by shifting their distribution. Also, improving connectivity can improve the ecological integrity of conservation areas, thereby enhancing the resilience of ecosystems to changes in disturbance regimes characteristic of climate change in many places.

For birds and other cavity users, retention of large-diameter snags should be prioritized.

Due to the value of pinyon-juniper to wildlife and its overall limited distribution in the Rocky Mountains, it should receive special conservation efforts on the GMUG. "Management" of pinyon-juniper woodlands should never

consist of eradication or conversion into grazing lands. In addition, the effects of oil and gas development, fire suppression, and firewood gathering should be considered in managing this forest type. Old growth harvest, forest fragmentation, structural simplification of clearcut stands, fire suppression, and snag removal can reduce the value of forests for birds and other wildlife and should be avoided.

A requirement for direct monitoring of species, including indicator species should be incorporated in the new plan to assess the status of populations and understand the effects of management actions on populations. Monitoring of species-at-risk, such as those that are listed as threatened or endangered, as well as species that are expected to respond to management actions should be prioritized.

Thank you for your consideration of my comments.