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Organization:

Title:

Comments: Dear Mr. Stewart:

As a resident of Gunnison County, a member of High Country Conservation Advocates, and a supporter of the Gunnison Public Lands Initiative, I am writing to comment on the Draft Forest Plan and Draft Environmental Impact Statement for the Grand Mesa, Uncompahgre and Gunnison (GMUG) National Forests.

I am concerned that Alternative B, the agency's preferred or "blended" alternative, recommends just 34,000 acres for new wilderness across the entire 3.16-million acre GMUG. Wilderness has intrinsic value and provides a wide range of benefits, including ecological, economic, aesthetic, recreational, spiritual, therapeutic, scientific, and moral values. Together with Howard Zahniser, the principal architect of the Wilderness Act of 1964, I believe that "we have a profound fundamental need for areas of the earth where we stand without our mechanisms that make us immediate masters over our environment." I also agree with Wallace Stegner, who famously wrote, "we simply need that wild country available to us, even if we never do more than drive to its edge and look in. For it can be a means of reassuring ourselves of our sanity as creatures, a part of the geography of hope."

Unfortunately, wilderness is threatened both nationally and globally. In the Anthropocene, we are witnessing the accelerating disappearance of self-willed, non-human nature. As humanity continues to inflict ecological wounds and wild places across the globe fall under the threats of resource extraction, energy and urban development, climate change, and privatization, it is my hope that our National Wilderness Preservation System can, with popular support, political will, and forward-thinking management, continue to form a refuge for plants, animals, and humans alike for many years to come. Globally, wilderness is the most endangered landscape, the least-sized, the one in shortest supply. Already we have lost so much. I think we should save all we still can. Here on the Western Slope of Colorado, we must grasp this opportunity of Forest Plan Revision to secure more wilderness before it disappears forever. In brief, I ask you to include significantly more wilderness recommendations in your final plan.

In addition, I am disappointed that the Forest Service does not adequately consider the Community Conservation Proposal painstakingly developed by a group of diverse stakeholders. For four years, residents in the GMUG region conducted field work and mapping, ran ecological analyses, and organized community conversations to identify those special places on the GMUG National Forests that deserve more conservation. The result is a Community Conservation Proposal. The Community Proposal, if adopted, would conserve ecosystems that are severely under-protected and vulnerable, protect key habitats for rare and imperiled species, enhance landscape connectivity for species movement and survival, safeguard regional drinking water sources, and provide great outdoor recreation. It includes a combination of recommended Special Management Areas and wilderness, and has been designed by local citizens to emphasize conservation values and sustain existing recreational uses. I urge you to better respect the hard work of community members in putting together this Community Conservation Proposal by incorporating its recommendations in your final plan.

Along these lines, I am concerned that the draft plan prioritizes logging over conservation. Alternative B identifies 948,200 acres of land as "suitable" for timber production, compared to 468,000 acres in the current plan. Indeed, every alternative in the draft plan posits a significant increase in suitable timber, which is a designation that can interfere with consideration of responsible management of the forests that allow uses other than timber production. We cannot log our way out of the beetle epidemic and out of fire risk. As you are aware, wildfire management is a highly nuanced issue that defies simple solutions, and logging is just one potential tool to address beetles and wildfires. Logging for the purposes of wildfire mitigation should be targeted around infrastructure and communities. Logging forests deep in the backcountry seems like a questionable strategy for

making communities more resilient to wildfires. Instead, we should mobilize resources to deliberately return fire to the landscape, allowing it to play its natural disturbance role in ecosystems whenever possible and appropriate. I hope you will reevaluate the balance between logging and conservation in your final plan.

Sincerely,

Tobias Nickel