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Comments: The draft GMUG Forest Plan and supporting Draft EIS is a well constructed and logical approach to forest-wide planning. In many ways the 2012 Planning Rule is a more comprehensive and detailed approach to forest planning than the ill-fated 2005 Planning Rule and more precise than the existing GMUG Forest Plan. I commend the planning team for their efforts.

There are many good ideas and well designed strategies contained in the Desired Condition, objectives, standards, and guidelines approach for each of the major Management areas. With that said, the point of having public review and comment is to identify flaws, omissions, and suggested additions to the Draft Forest Plan with the idea that such public input will make for a better Forest Plan.

My specific comments of the Draft Forest Plan are first addressed by Management Activity and then with some general comments on the Draft EIS alternatives.

Conservation Watershed Network: There is an inclusion of the 12 or so sub-watersheds that address aquatic species objectives or emphasis but there does not seem to be a link between those objectives and ultimately the designation of Priority Watersheds.

Reference to the Colorado Cutthroat Conservation and Recovery Plan would be appropriate in this section, as it is the commitment the Forest Service has made to managing that aquatic species.

There is also no reference in the guidelines to the process of utilizing the Colorado Instream Flow program whereby the Forest Service can and should make definitive recommendations to the State for instream flow water rights to ensure adequate flows for aquatic species on NFS lands. The GMUG has been the leader in Region 2 in working with the State on making Forest specific instream flow recommendations and this should be the guidance for this Forest Plan.

Watersheds and Water Resources: While this is essentially my area of expertise, I believe this section of the proposed Forest Plan is quite inadequate. Reference to the National Forest Service mandate to provide for "favorable conditions of flow" is not mentioned specifically it should be and is the underlying desired condition for all National Forests. It is worth including under this management activity.

It is clearly stated that allocation of water resources is a State of Colorado function, the water rights process does not preclude the Forest Service from conditioning Special User Permits so that aquatic species are not adversely impacted and favorable conditions of flow are maintained. Special Use Permits are required for the conveyance and storage of water facilities on NFS lands irrespective of State water use authorizations (water rights and conditional water rights).

The GMUG worked collaboratively with numerous stakeholders back in 2001 through 2005 under the banner of the Pathfinder Project to identify and develop strategies to would provide for adequate instream flows, water diversion management, water storage and operations management on GMUG NFS lands. Yet there is no reference or mention of these Pathfinder strategies. The Pathfinder Report was the basis of the US Forest Service Region 2 and Colorado Department of Natural Resources MOU (referenced in this Draft Plan) on water resource management. Both the Pathfinder strategies and the referenced MOU need to be included in this management activity section as either a standard or at the very least guidelines.

Additionally I believe there is a need to identify road density as a critical metric to assess watershed health and

condition. Road density (miles of road/acre) in a watershed is critical to sediment yield, erosion and water quality. There should be objectives for acceptable levels of road density on the GMUG. That information is readily available and was one of the basis for evaluating watershed health in the 2010 forest planning effort. That exercise conducted by the GMUG Forest aquatics and hydrology team seems to be lost or omitted. While the Forest Service Watershed Condition classification system is recognized as a Forest Service standard, it is a weak evaluation criteria (additional comments on that system under Priority Watersheds). The GMUG resources staff used more detailed metrics in its 2010 forest planning effort to evaluate watershed health. This information is available in Forest Service and GMUG records and databases.

Special Use Permits; Again the Pathfinder report outlines strategies and management approaches to providing for favorable conditions of flow and instream flows. There are more avenues available to the Forest Service than just the State's instream flow program. As stated the GMUG has more water diversions permitted on this National Forest than almost any other Forest in the nation. There is a need to provide more objectives for water resource related special use permits and identification of strategies contained in the Pathfinder report in the guideline section of this management activity.

Conditions and requirements contained in Special Use Permits are one of the strongest tools the Forest Service has to providing favorable conditions of flow and aquatic species protection. Asserting those authorities are not popular with water users nor the State of Colorado water rights authorities, but that was the focus of the Pathfinder Project, to find to those strategies acceptable to stakeholders, the State and the Forest Service. Again reference to that process is needed in this section.

Priority Watersheds: Utilization of the Forest Service watershed condition classification system is inadequate to identify watershed problems and potential restoration efforts to improve watershed condition. Analysis of watersheds at the 6th level HUC is really too coarse of a filter to provide meaningful watershed condition or to provide direction for possible watershed restoration work. The previous GMUG watershed team found that invasive species over powered such metrics as road density, mine discharge and steep slopes in evaluating watershed health. Also projects to alter invasive species ratings are too large and expensive to improve 6th level HUC conditions.

There are at least 7 or 8 watersheds that can be identified as Priority Watersheds on the GMUG. These 7 or 8 sub-watersheds at the 6th level HUC classification are lost. When evaluations are made at the 7th level HUC those sub-watershed can provide meaningful insight to where watershed restoration projects and land management decisions regarding timber harvest, road construction, and recreation (travel) can complement improved watershed conditions. It is those 7th level HUC watersheds that should be considered in developing a list of Priority Watersheds for the GMUG. There is no reason not to identify more than one Priority Watershed for the GMUG in a landscape that has the need for watershed restoration objectives in more than the Oh Be Joyful 6th level HUC. The objectives for Priority Watershed restoration needs to be more encompassing of the more adverse metrics than can be defined at the 6th level HUC watershed condition classification system.

Timber Sale Quantity: The alternatives addressed under this management activity are really just a numbers game. Higher levels of possible cut appease the timber industry and politicians and the lower numbers seem to placate environmental groups. The Forest Plan should realistically address what can be harvested from the GMUG given current staffing and what the landscape can sustain without adverse resource impacts to wildlife, watersheds, wetlands and range.

Again from a watershed/water quality perspective alternatives advocating higher levels of harvest will ultimately involve new roads. Whether roads for timber harvest are permanent or temporary (which the GMUG has a poor track record of closing once done harvesting timber) these features increase road density, a major contributor to erosion, sedimentation, and wildlife habitat degradation. The staffing and infrastructure associated with the various levels of harvest needs to be fully assessed and addressed in selecting an alternative for this Forest Plan. I

do not believe the Forest Service has done an adequate job addressing those impacts associated with timber harvest quantities.

Also in this section there is a statement that states harvesting on slopes in the 40% range is possible because new techniques. No way. Even in the Pacific northwest where aerial logging operations occur the impacts on slopes in the 40% range are considerable, particularly related to erosion and sedimentation. Colorado has no infrastructure available in the private sector to do aerial logging. This alternative is essentially pie in the sky planning.

Also playing around with the criteria for suitable timber is again a numbers game aimed at providing some artificial range of alternatives. There is clearly a need to address an aging forest stand on the GMUG, but that should be addressed directly with objectives and not playing around with the suitable timber criteria in the Forest Plan. Over-mature forest stands aren't necessarily a bad thing from an ecological perspective. Efforts to salvage diseased timber has been a reasonable focus on the GMUG for the past 6 or 7 years, but the future should not look to maintain that level of timber harvest.

Quick Guide: Wonderful document. Nicely done and helpful for the public to digest a complex planning effort.