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Comments: Thank you for the opportunity to comment on your draft Revised Forest Plan of the GMUG forest management. Your staff have obviously put in a lot of time and effort in gathering the information, analyzing the data, and arriving at your draft plan. I would like to comment on a few of the issues that I am most familiar with.

The plan revision provides the perfect opportunity to adopt community supported conservation protections while helping the nation reach the goal for protecting 30% of our lands and water by 2030, a priority of the Biden administration. While 19% of the GMUG is protected as wilderness, many of the forest remains unprotected by wilderness or other land designations.

The preferred alternative's 34,000 acres of recommended wilderness is a small reflection of lands that should be recommended. Our Wilderness resources in the North Fork are worth protecting, and GMUG Forest must prioritize these resources before they are lost forever.

The Forest Service does not adequately consider the designations in the Gunnison Public Lands Initiative (GPLI) or Community Conservation Proposal. Takeaway: These must be better reflected - and incorporated - in the final plan - especially due to the threat of Climate Change. Gunnison, Ouray, San Miguel, and Hinsdale Counties united to submit a letter to the GMUG stating that "at this time we cannot support the pre-Draft plan and Preferred Alternative B as presented." One of their four reasons they stated was the lack of management policies related to Carbon Sequestration.

Per GMUG DRAFT EIS Volume 1. Page 90
Climate Change - Decades of research shows the Earth's climate warmed rapidly during the 20th century and this trend is expected to intensify in the future (USDA Forest Service 2016, Furniss et al. 2010). These changes result in impacts to ecosystem processes including the timing, amount and type of precipitation, invasive species encroachment, shifts in fire regimes and intensity, insect infestations, carbon storage, and species health and resilience (USDA Forest Service 2016, Peterson et al. 2011). As such, climate change is a major ecological stressor in the GMUG.

Page 253:
Climate change-driven extreme weather events will likely have rapid, dramatic effects on ecosystems.

My first area of concern is in regards to recommended wilderness:

Coal Mountain:

The GMUG's Wilderness Evaluation rated this area with a HIGH degree of wilderness characteristics, which I agree with. Yet the Alternative B does not include this as recommended wilderness. It is included in Alt. D. I've hiked just about every part of the established trails in this area and have climbed most of the surrounding peaks - including the top of Coal Mt from the Inter-Ocean Pass. This entire area certainly meets every criteria that qualifies it for wilderness.

There is extraordinary wildlife. For instance, it's importance as a wintering and migrating elk range. Little Coal Creek and Minnesota Creek contain Colorado Cutthroat Trout. This Roadless Area has minimal conflict between

humans and its abundant wildlife.

The main trails through this area are mostly rugged and have much solitude - its main use is during hunting season. And the accessibility to the 3 main trailheads are pretty difficult, thus enhancing the primitive recreational appeal. The local community seems to be quite receptive to trail stewardship.

The historic grazing rights should not be changed with this Wilderness designation. With its bio-diversity, the naturalness and its size, this would be a great addition to the adjacent West Elk Wilderness.

Electric Mountain:

Electric Mountain area should be considered as a HIGH degree of wilderness characteristics. Your evaluation came up with Moderate. I recommend it be included as recommended wilderness.

It certainly has the naturalness. The only trail that cuts through from west to east does allow Mechanized Vehicles, but due to its ruggedness and difficulty, it doesn't seem to get any of that activity once you get into the current actual roadless area.

The area is surrounded by private lands and infrastructure - such as FR701. But those would be outside the boundaries of this area. Likewise, the only cherry-stemmed road that I see on the map is just outside the roadless area.

Your evaluation does mention improvements such as fences and ponds and ditches. But they, as you note, do not distract from the naturalness of the landscape as a whole.

Chalk Mountain and Elk Park:

The Chalk Mountain area and part of the Elk Park area are not included in Alternative B's recommended wilderness. They are included in Alternative D.

Chalk Mt area is bordered on every side with either trails or forest roads that form a perfect boundary for the rugged Chalk Mountain area. In my frequent travels here, I've observed no evidence of access of motorized or mechanized vehicles along this entire route. In fact, it is tough enough to just hike into this remote place. It certainly contains all the criteria for HIGH wilderness consideration.

Likewise, I've explored along the Elk Park Trail west of Overland Reservoir up to the ridge line above the Leroux Creek drainage. It also seems to contain a HIGH degree of wilderness qualities. It is the source of the Main, Middle and West branches of Hubbard Creek - an important water source for the North Fork Valley. It is rugged country, with very little, if any, access once you get off the Elk Park Trail.

My recommendation is to go with Alternative D and include both Chalk Mountain and Elk Park in your recommended wilderness.

McClure Pass/Munsey Ruby Stock trail:

Alternative B includes a small section of this trail in your Recommended Wilderness, whereas Alternative D includes a much larger portion. I support your Alt. D recommendation. This narrow strip of land would be adjacent to the current Ragged Wilderness land, and just to the east of The Ragged Trail. It shares the same characteristics as the adjacent wilderness.

Mendicant Ridge:

Alternative B does not include this area in your recommended wilderness, whereas Alternative D does. It is adjacent to The West Elk Wilderness western boundary and has the same wilderness characteristics. I spent 4 days this summer with my feet on the ground - from Bald Mt. Reservoir down the entire Mendicant Ridge; also from the Piburn Trail to Curencanti Creek down to Trail Creek Trail; and then back up to that trailhead. So I basically had a first-hand look along much of this recommended wilderness. Most of it border on the West Elk Wilderness land. As my hiking partner stated - "If this isn't wilderness, I don't know what is?".

I strongly support the Alternative D that would include not only this Mendicant Ridge area, but also Coal Mountain, Chalk Mt, Elk Park and the Munsey-Ruby areas. All deserve this protection - which would be an important step in the 30X30 initiative. Hopefully your final plan will include these as written in the Alternative D.

Logging:

Every alternative in the draft plan adds a significant increase in suitable timber, which is a designation that interferes with consideration of responsible management of the forests that allow uses other than timber production. I am very interested in ensuring any type of timber harvest does not impair other values such as wildlife, Wilderness or water resources. Logging for the purpose of wildfire mitigation should be targeted around infrastructure and communities.

The GMUG contributes to Delta County's economy in various ways, especially through recreation and agriculture. Based on Delta County's reliance on the recreation industry and its dependence on recreation opportunities (including scenery and other natural amenities) the GMUG provides, plan area direction has the potential to have meaningful impacts on the local economy. Our local wildlife populations attract many hunters, anglers, and bird watchers to the North Fork each year. Providing management structures to protect these resources is critical for local communities.

Alternative D goes a long way to prioritizing our recreation and Agriculture economy. But I'm concerned that the significant increase in suitable timber will have a negative impact on the future of the North Fork Valley and it's scenic characteristics and diverse economy.

The Forest Service's former deputy chief, Jim Furnish, criticized the agency as too focused on timber production and too slow to react to climate change, to the detriment of the forest. Disagreement within the agency over whether there was too much logging culminated in a report this April by scientists from the forest service's research branch that was unequivocal in the Black Hills Forest : this forest logging needs to cut back by at least half, possibly more, to be sustainable. Like the Black Hills, the GMUG forest has changed due to climate change but your Draft plans are actually increasing the logging rates.

Thank you for your hard work, it is much appreciated.