

Data Submitted (UTC 11): 11/16/2021 1:31:44 AM

First name: Ryan

Last name: Leonard

Organization:

Title:

Comments: Dear Local Forest Service Leadership Team,

Thank you for the opportunity to comment on the Draft Forest Management Plan for the GMUG national Forest. My family and I are avid forest user of the GMUG National Forest. For the past year 14 years, My family average over 150 user days within our public lands. As the Forest Service plans the future of this important National Forest networks, I am writing to urge you to base decision making on science and using a rubric such as S.M.A.R.T. to help guide The Forest in clear communication in the setting of management objectives. The letters specific, measurable. Achievable (or attainable), realistic, and time-bound.

With this as our rubric, this land management plan MUST have more focus on people / recreation management than its past Forest Management plans due to greater demands by the user. Below are items I feel the plan must address.

The Plan should:

The Forest Service first priority for this management plan should be protection of large system functions, such as forests, ecosystems, wildlife habitat and corridors. Then The Forest Service must look at your own active management and ask, are you doing more harm to these important systems?

Funding:

Have written plans to address deferred maintenance. Recreation in our forests is one of the largest economic drivers in the valley. With so much deferred maintenance, users and abusers. The Forest Service needs to develop a continual, fair funding source from ALL users that is not derived from the federal government budget but rather its user base. I propose an annual forest pass, \$100 per vehicle per year, and \$200 per trailer or \$20 per day for a day pass which should start as soon as possible.

Fund source for deferred maintenance of recreational facilities, trails and trail systems camping, bathrooms, and roads.

1. Hire more Law enforcement
2. Develop new sites: address the need for more recreation user sites / or create more designated areas for concentrated recreational opportunities such as, develop more camping options from campgrounds with services to dispersed recreation.
3. Need to develop concentrated trail systems that have numerous trails that serve all users. Similar to Skyway Skiing Trailhead, 18 Road or Ridgeway Trail System.
4. Hire more trail crews for a living wage.
5. Improve overall recreation opportunities, such as provide better visitor education, visitors contacts with information and interpretation so that all visitors better understand how to act responsibly, trails systems, maintenance, more camping opportunities (development and undeveloped), at trailheads and parking areas.

Subsidies: As a tax payer, I believe we should all pay our fair share to enjoy our public resources, our National Forests. The Forest Service plan needs to address and have justifiable criteria for its fees or lack thereof, and have justifiable criteria leaving them below current fair market value. An AUM is NOT justified in 2021, and is one of the reasons for so much deferred maintenance. I believe this is important because the review should provide a cost benefit to each management activity: horses, skiing, grazing, hunting, hiking, Mnt biking etc) and financially show their true impacts to our public lands (damage, rehabilitation, management process). Areas that should be reviewed: Legacy users and super utilizers (grazer- a true cost of damage from road maintenance, habitat damage, trail damage, nonnative vegetation species spreads and remove), permittees, and legacy fees. Funding

needs to be realistic to meet the first objective of addressing backlog maintenance. An example, My family goes camping for 2 nights. I'll spend at a NF campground ~\$40 + for 3 days of recreation while a cow and calf is a fraction of that amount and causing exponentially more resources damage and negatively impacting wildlife as well. They should be paying their fair share. This plan needs to address this inequity.

The GMUG Forest Plan needs to address / plan for population growth and over usage. The plan needs to expand all opportunities to spread out usage across the 3 forest systems.

1. The plan needs to address lack of law enforcement to protect the forest from illegal activities (logging, motorized vehicles off trails (ATV), dumping, poaching, drug cultivation, and squatters, to name a few).
2. Create a permit system for popular areas.
3. The plan needs to address areas of possible closure by providing better management by create more opportunities for recreation, not less. The Forest Service lack of resources is not justifiable means to close an area to our public access. The general public will make their own opportunities elsewhere on the forests causing more harm. Be a land manager or they will manage it for you.
4. What is the Forest Services plan for wolfs? Does this plan account for wolfs / human interaction? As a land manager, are you being proactive or reactive to this traditional predator regime? What about poaching and poisoning of these animals, and the other animals that will eat them? I didn't see this in the draft.

Climate change. This plan needs to address climate change and how it directly will effect active management. The plan should address its effects on the ecosystems within these forests by active management. This must be justifiable. One of the first ecosystem wide climate change events that I have seen occurred in the early 2000s on southern exposures of aspen stands. The Battlements are a great example of a massive decline of old growth aspen species due to drought and global warming.

Plan should address current and future climate predictions to mitigate:

-Ecosystems

-Water resources /sheds

-Forest fire mitigation

-Forest pollution, activities and or groups using the national forest. (camp fires, non-motorized, motorized, grazers, hunters, logging, oil, gas and mining). For example, the National Forest allowing a timber sale of beetle killed trees on a southern aspect. Will they grow back, or is the site too hot and dry because of climate change. What about in 10 years? Or should it have been planted to promote regeneration. Or maybe even promote woodpecker and flicker habitat to increase predation on beetles rather than removing its habitat. All new complexities should be addressed or mitigated for any active management. The GMUG plan should be promoting future-thinking to account for global warming to ensure no more habitat loss or continued declining in species.

Modernization

This plan needs to address modernization. After reading some of the draft I feel like it is a copy and paste of prior plans. How the Forest Service operation is antiquated, technology could really help. Your website is poor for modern standard, permit system is rather unfriendly and really needs updating. The plan needs to address heritage users, grandfather "in" type management and reevaluating permittees. Does the plan account for wolfs? This plan must address cost benefit analysis to see if heritage users meet the future management objectives. The Forest Service must develop justifiable criteria based on current data, cost benefit analysis, and global warming. The plan needs to see if heritage users / permittee meet the management objectives and goals. In my opinion, there has been too much logging in the plan and it has the wrong emphasis (more logging in wetter higher elevations and less vegetation management in lower drier areas). It is time that the FS acknowledge that logging as presently practiced is a subsidy to provide a few jobs and little benefit. These projects all cost the taxpayer. Some logging is necessary for forest health in certain locations but when it occurs, the taxpayer should be rewarded with improved forest health, by adding fire treatment to improve seeding. In addition, this plan does not acknowledge that most scientific studies indicate that beetle-killed areas are NOT more fire-prone. Many logging operations cause more beetle issued due to lack of removing slash and poor management causing

additional blow down events. Logging should be performed only when selectively leaving a mosaic of species, salvage event sales (blow down and fire event) and mixed ages of trees. Tree planting should be performed in these areas to create wind buffers, mixed aged stands and faster regeneration.

Roadless

Over the past 14 years, I have seen motorized activities explode on the National Forest, mostly destructive. From reckless driver speeding out of control, pushing me off FS roads, Atvs playing into all hours of the night (noise to wildlife), damaging trails / barriers that limit them, chasing wildlife, Motorized hunting pressure/ poor hunting stewards, Atv crashes with chemical spills in the forest, to UTV and ATV going wherever they please. I have reported this kinds of actives numerus times, including pictures, licenses plates to the Forest Service and Mesa County Sheriff's Office with NO response. This is a major problem, because of ir-repairable damage to the resource (a new path for others to explore.) I am asking that motorized sports must have annual prerequisite education. The Forest Service needs to manage motorized impacts, better ways to report illegal activity and use of more trail cameras. Motorized users need to be accountable, pay their fair share by a permitting and licensing as well as limiting pollution. (Air, land noise) . The forest needs many more law enforcement to enforce management objective, paid by user fees. In areas with road less, manage all our remaining road less areas to protect their wild, non-motorized character. Protect Fish, Wildlife and Native Plants from hunting pressure, motorized and livestock damage. The Plan needs stronger conservation standards to more fully protect and define vulnerable and at-risk species. For example, what is the Forest Service doing for the 20 year decline in Mule Deer? Has it looked in domesticated livestock, their diseases and their detrimental causes to the National Forest (riparian areas).

Fire and Forest ecosystem health. The new GMUG plan provides an opportunity for the Forest Service to update its approach to managing fire to better protect both our forests and our human communities. Science has shown that the way to lessen the risks associated with forest fires is actually to allow for carefully managed natural fires and purposeful controlled burns, and to proactively create defensible space around homes and communities. Yearly fuels treatment work. The threat of fire is not reduced by logging of large trees. Large, mature trees provide important habitat for birds and mammals. The Forest Service should make it a priority to protect large trees that are 24 inches in diameter or larger for habitat. Numerous wildlife species rely on these big trees. Our communities will be safer and our forests healthier if the Forest Service emphasizes the removal of surface fuels, liming, brushing and small trees that help spread fires into the forest canopy. Forest Service should look at charging fire protection fees in urban interface to modernize and to incentivize being fire wise. This plan needs to address current and future development in wildland urban interface. At a minimum standard that every new structure is fire wise or 2021 International for a code. This would include fire wise educate for everyone. Forest Service should look at charging fire protection fees in urban interface for these stakeholders.

Partnerships.

In these tight-budget times, the agency can work to better monitor, maintain and protect recreational opportunities and the health of the National Forest by fostering strong partnerships and cooperation between Forest Service employees, local communities, non-profit organizations, businesses, and other partners. Such as, Access fund, western colorado climbers coalition, Powderhorn, COPMOBA, Grand Junction off road community, Nordic council, Grand Valley Audubon, Backcountry hunter and anglers.

The Final GMUG Forest Plan should be looking more to the future and less towards old legacy management practices. The new plan should be an economic driver for our community-based on recreation. It should also include additional details on how the agency will hold itself accountable to creating and fostering the partnerships that are so vital in these tight federal budget times. The GMUG National Forest is very important to me and my family. I'm glad to be able to comment on the Draft Plan for the GMUG National Forest. It is important to me that this document contains important protections for critical wildland ecosystems, to safeguard our valuable water resources, fish and wildlife habitats and sustainable recreation. I support a stronger, more modernization science-based plan that will more fully protect and provide: 1) protected habitats (air,food, water and cover) for

fish, wildlife and plants & effect from global warming. 2) high quality outdoor recreation with funding / enforcement; 3) Provide forest managers with funding so we all pay our fair share; 4) Update the management plan to include climate change, modernization, evaluate grazing, legacy user and fees. 5) Providing community and ecosystem protections through a more natural role for fire in our national forest. Lastly, make more partnerships to help manage our resources