

Data Submitted (UTC 11): 11/21/2021 8:22:48 AM

First name: Susan

Last name: Enzinna

Organization:

Title:

Comments: Thank you for the opportunity to provide comments on the Draft Revised Forest Plan and Draft Environmental Impact Statement that will guide future management for the Grand Mesa, Uncompahgre, and Gunnison national forests (GMUG). As a Coloradoan who cares deeply about the GMUGs 3 million acres of public land, I believe the draft plan is a good start but could be improved in the following ways:

The draft plan proposes a significant network of Wildlife Management Areas (WMAs) intended to provide secure habitat for wildlife by minimizing the disturbance from motorized and mechanized vehicles through a cap on new routes. This is an important step, but the Forest Service should also limit route development to its existing density and reduce route density in WMAs where the cap is already exceeded. In addition, vegetation management within WMAs should occur only for the primary purposes of habitat restoration or improved ecological function. These actions are an essential step toward conserving movement corridors for big game and other wildlife species.

A key mechanism by which the Forest Service can ensure the continued health of important watersheds which is required by agency regulation is evaluating rivers potential eligibility for designation under the Wild and Scenic Rivers Act. Of the thousands of miles of rivers in the GMUG, the draft plan identifies only 14 river segments and some of their tributaries as eligible, although the agency has data showing that many more rivers qualify for this designation. The Forest Service should reconsider eligibility determinations for streams including, but not limited to, Horsefly Creek and Anthracite Creek on the Ruby Fork and the Forest Service should identify additional rivers as eligible for wild and scenic protection in this plan.

Despite the economic significance of the GMUGs undeveloped backcountry to wildlife and local economies and significant support from numerous community-based organizations and county commissions the draft plan recommends only 34,000 acres (just over 1% of the GMUG) for wilderness designation, even though the forests contain over a million acres of roadless lands. For example, Kelso Mesa (the largest roadless area on the Uncompahgre Plateau) and the Beaver area northwest of Gunnison (whose creeks support Green lineage Colorado River cutthroat trout) were not included in Alternative B despite being evaluated as possessing high degrees of wilderness characteristics and public support for their recommendation. Recommending more acres as wilderness would acknowledge their contributions to wildlife and communities and help conserve them until Congress decides whether to include them in the National Wilderness Preservation System. The Forest Service should reassess its wilderness recommendations to reflect the many high-value areas and the broad community support for these lands.

These improvements would help the GMUG for years to come and ensure robust conservation measures for the forests sustainable lands, rivers, wildlife, and communities.