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Comments: GMUG COMMENTS
These comments represent the approximately 400 members of Grand Valley Audubon Society (GVAS) in Grand Junction. Our members live within, near, and recreate throughout the GMUG. We appreciate the opportunity to comment. We also acknowledge the complexity of developing a plan for such a large area and diversity of users.

Many of our members are long-time residents of the area and we deplore what we have observed as an overall general and continued degradation of much of the GMUG. For this reason, we support the Community Conservation Proposal (CCP) developed by numerous conservation organizations, local stakeholders, and members of the public. Accordingly, we support Alternative D, with the addition into the Forest Plan of all the wilderness areas and Special Management Areas included in the CCP.
oWe recommend that the Preferred Alternative include the Wilderness and the Special Management Area designations included in the CORE Act.
oAs documented in the Community Conservation Proposals, these spectacular areas possess wilderness qualities and should be categorized/mapped accordingly into the Forest Plan:
oBear Creek & Baldy Mountain as additions to the Uncompahgre Wilderness
oHayden Mountain as wilderness
oAbrams Mountain as Special Management Areas (or special interest area)
oKelso Mesa recommended wilderness

Furthermore, Grand Valley Audubon has five overarching comments that the USFS has not adequately or specifically addressed.
1.The plan must state how the historical problem of insufficient funds for enforcement of long-recognized regulations will be addressed. Perhaps an annual forest pass should be proposed.
The plan should acknowledge that historic enforcement funds have not been sufficient and will need to increase. For example, a few years ago one of our members called the office in Collbran to complain of a cattle salt lick set up next to a creek on the GM-in violation of the permit. The response received was that "this office has xxx thousand acres to patrol and we cannot get to everything."
Perhaps, the biggest enforcement problem is the continued expansion of areas used by vehicles, especially ATVs. Every time one sets a track off the approved trail, someone comes along later and goes a little further. Soon there is a "road" or, at least, an increased area of denuded vegetation. Enforcement needs will increase as population increases.
Additionally, semi-permanent hunting camps that include "built" structures often persist for weeks without any oversight.
2.The plan should comment on the imbalance of funding and fees. An example is camping which may cost several tens of dollars for a weekend. Yet, a cow/calf unit can use the resource for months and pay less. A single cow/calf pair on a section of the forest may cause more damage to roads, fences, and wetlands than other uses combined. The entire fee/permittee structure should be recommended for review and revision. An example is "Hell's Hole" on the GM. There is a trail to this area and down to the creek. Cattle have destroyed most of the native vegetation. Houndstongue and thistle have made the area virtually unusable in the summer. It is not multiple use when locations are made unusable for others.

3.The role of logging in the forest needs revision. The plan needs to address how it complies with the vision recently reported by The President at the recent climate conference. President Biden said the following: "Preserving forests and other ecosystems can and should play an important role in meeting our ambitious climate goals as part of the net-zero emissions strategy we all have. The United States is going to lead by our example at home and support other forested nations and developing countries in setting and achieving ambitious action to

conserve and restore these carbon sinks."

The logging that is proposed in the draft plan would provide local jobs but these will still come at an ultimate loss for taxpayers. That the logging is subsidized should be acknowledged.
a)Logging should address climate change from the standpoint of carbon storage, but also from the standpoint of successional change. For example, there are locations on the GMUG that were severely affected by Sudden Aspen Decline (SAD). Some of these areas are regenerating, but some are not. There are locations along the East Brush Creek trail on the GM that are now only piles of dead aspen logs. These are areas where snow cannot accumulate to provide a source of long-term seepage from above. Snow accumulation is expected to continue to decrease. Hence, how does this plan address the uncertainty that logged forest can be regenerated as climate changes? It should be noted, that until the last decade, the Western Purple Martin was common in these areas but appears to be no longer present.
Additionally, against this backdrop, why does the plan not ban any logging or additional development in Boreal owl habitat? This owl is only found in the highest, coolest, wettest locations of the forest-those areas most at risk from climate change.
For that reason, old-growth, in particular, should not be logged. The expectation that old-growth Ponderosa, for example, will return in 100-years must be well-supported before any is cut. Specifically, the plan must justify these cuts with research that supports the probability of re-growth.
b)GVAS supports logging that is performed from the viewpoint of forest health and safety. Neither are addressed sufficiently in the draft plan. For example, a reading of the literature suggests that beetle-killed forest, after a year or two, is not more fire-prone. If the forest planners do not believe in these published results, then specific justification must be supplied in the plan to ignore them. Logging to prevent fires is not a justification in most cases. Logging to develop a resilient mosaic of species and mixed-aged stands can be a justification. The plan should address this issue explicitly.

c)Logging's effects on sensitive species are not adequately addressed. An example is a project a few years ago that removed extensive Ponderosa along the road to Columbine Pass. Formerly, this area had a large population of Flammulated Owls. A member of Grand Valley Audubon once counted ~30 in one evening. After the logging, two GVAS members repeated this protocol and found none in the logged area.

The literature (Flammulated Owl Life History, All About Birds, Cornell Lab of Ornithology) indicates a total breeding population of only 5,500. How can any removal of potential breeding territory for a species with so few members be justified?

4.The Forest plan is too dismissive of declining species. It is disingenuous for the USFS to continually state that a single project or small number of projects have an insignificant impact. The problem is that "insignificant impacts", performed all over a species' range, add up to a significant loss. As noted in the reference cited above, Flammulated Owls are both declining and have a small population. Similarly, Olive-sided Flycatcher numbers have declined ~80% in the past few decades. Grace's warbler, an obligate of Ponderosa forests has declined more than 50% (Grace's Warbler Life History, All About Birds, Cornell Lab of Ornithology). Yes, the causes of decline are multiple. But if the USFS is going to "set an example," as stated above by President Biden, the plan should justify why there are not specific projects to enhance these species.
The discussions for many of the species are incorrect and lack depth. The errors and omissions suggest there is little credibility to the discussions. Here are a few examples: (a) the draft says there were only two sightings of Lewis Woodpecker and the latest was 2014. Irrespective of this species population trends, there are far more sightings. The ebird data base shows several each year along portions of the Divide Road. Those were found with a minute or two of looking. There are likely a lot more. (b) The dismissal of Boreal Owl because of the number of sightings discounts the fact that many birders statewide and national now have annual goals for number of birds seen and heard. Because the Boreal Owl is "possible" in the GMUG, many people come from other parts of the state to hear one. The ratio of effort to number of reported sightings is very high. Discussions with local birders indicate that Boreal Owls have become more difficult to find. Yet, people persist because the

species is so local and so much desired. In this way, statistics on sightings can be very misleading. (c) The flammulated owl discussion does not take into account that the bird reproduces more slowly than other owls and has a breeding population estimated at only 5500 pairs (Allaboutbirds on-line database). Habitat requirements for the bird are very specific, requiring old-growth that is very desirable for both timber and recreation. As noted elsewhere in these comments, the USFS needs to address the near-term future of Flammulated Owls in the light of both climate change, the logging that is suggested by the plan, and the overuse in portions of the forest where this bird is still common. (c) The Black Swift has undergone enormous population declines and to dismiss study of this species because it has a "broad range," is disingenuous. The bird has specific habitat requirements. It breeds only in areas that are cool, wet, and shaded-typically behind waterfalls. The climate change models all predict higher temperatures and greater aridity for the four corners. In consort with the large population decline already underway, how can the USFS dismiss this species and not include it as a species of concern. Specifically, the determinations that many species listed in Table 51-53 in Appendix 9 of the Plan with unknown population trends are precluded from meeting the SCC List because they do not show "declining trends in populations or habitat in the plan area" is a "cop-out." (Listing indicator 2 from page 237 of Appendix 9 in the Plan). Considering that where data exist, the species are declining throughout their range, the lack of data on population trends should be considered a threat to the population, until refuted by updated information. In contrast, Colorado Parks and Wildlife (CPW) handles this issue for their designated Species of Greatest Conservation Need (SGCN) proactively in the State Wildlife Action Plan (SWAP). The SWAP in Chapter 2 lists "lack of scientific knowledge" as one of the criteria for Urgency of Conservation Action. Throughout Table 7 in Chapter 5, CPW includes a threat designation of "Population trend unknown" or "Lack of data on population trend," with recommended General Conservation Actions of "Research & Monitoring", and specific recommended Conservation Actions that include researching population parameters and monitoring population status to Improve understanding of species/habitat distribution.

We ask that the FS include a separate Table (using data from Table 53) which classifies/lists species with unknown population levels or unknown trends in population levels. This will identify to the FS the species where research and monitoring before determining SCC listing.

Secondly, the Management Approach for At-risk Species on page 31 of the Plan should be made into one or more Objectives for research and monitoring of species with unknown population trends within five years, AND an objective to reevaluate the species inclusion as SCC in the Plan. The FS can ask for cooperation from its many partners, including The Colorado Natural Heritage Program and organizations such as the Audubon Society. Since the Plan is meant to cover the next 10 to 20 years, it is imperative the FS commits to examining population trends where that data does not currently exist.

Botanical Species of Conservation Concern (SCC)
We support using Colorado Natural Heritage Program (CNHP) data as one of the best available scientific resources for plant species of concern. However, 60% of the current CNHP records for the GMUG are more than 20 years old. Consider how rapidly the problems with Sudden Aspen Decline (SAD) occurred. Hence, these data are unlikely to reflect current status of botanical species. As we have stated above for wildlife SCC, plant species with statements that no population trend data exists should not automatically preclude the species from listing as a SCC.

We ask that the FS add the following to the Plan:
a)Reclassify the botanical species in Table 53, Appendix 9 in the Plan with designation of no population trend data into a separate table.
b)Include as objective(s) under At-risk Plants (page 31 of the Plan) to complete population trend inventories of the plant species in this new table within the next five years, with the plan to reassess these species for possible inclusion into a updated version of the Plan.

5.The plan does not sufficiently address current and expected overuse. Why aren't projected population

increases for the area surrounding the GMUG addressed? What criteria will the USFS use to decide that an area is over-used? Why not address some of these problems now with the permanent plan? Attempts to control these usages later will add to the delay and most likely ensure more damage if not inaction. For example, how does the USFS plan to address overuse along Divide Road from Jack's Canyon to Columbine CG? This area is very popular for "at-large" camping. The degradation of the understory worsens each year, and, indeed, is accelerating as larger camping rigs and larger groups abuse the area. This past May, GVAS members drove the road to listen for Flammulated Owls. Instead, in many locations, there was loud music and even strings of blinking lights that had been set up in the trees. As many as four large camping vehicles, along with equal numbers of truck-mounted campers and tents, were crowded together. There are too many people in one location. How does the USFS justify allowing so many people in so many locations camping in this manner? Other areas submitted by our members as severely overused include along the road to Mule Park and Muddy Pass. Those areas, besides harboring Flammulated Owls and Olive-sided Flycatchers, are strongholds for the Western Purple Martin.