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Comments: Hi Folks,

Thanks for all of your hard work in putting together this Draft Forest Management Plan and for the opportunity to comment on it. As a retired land management professional I know how hard it is to put together an effective plan. Here are some observations and comments that I hope may be useful.

As stated, the overall purpose of the Forest plan is to provide the vision and strategic direction needed to move the forest toward ecological, social and economic sustainability. It is not meant to specifically identify a large number of management actions. Instead it attempts to describe the natural and management conditions you feel are appropriate to manage the forest in a sustainable way. Then any future management actions that are proposed are compared against the ecological conditions they are trying to maintain.

One concern I have is that this approach has the potential to result in a more reactive Forest Plan rather than a proactive Forest Plan. In other words your focus seems to be to make sure that future activities do not degrade the overall condition of forest resources beyond where they are now. There are some management objectives or actions that are meant to improve current conditions but all in all there isn't a strong focus on addressing current problems or improving current conditions. In general, I think there is room for more proactive strategies in the Plan.

Specific observations on the Draft Revised Forest Management Plan as described in Volume 1.

Pg 14 - FW-DC-ECO-3 you talk about the need to inventory and monitor areas of Climate Refugia. These are, I assume, places where the effects of climate change may be less noticeable. They may serve as a place where native species can find refuge from the effects of climate change. Perhaps it is hoped they could also serve as a source for native species to spread out from if we ever figure out how to reduce the impacts of climate change. I am not sure of the value of this strategy. What may be a refugia today will be less likely to function as a refugia in 10 or 20 years unless we can resolve the underlying problem of climate change. The Management Approach mentions specific goals in areas of Bristlecone and Limber Pine communities which is a very small part of the overall forest.

Pg 32 - FW-GDL-SPEC-22 - calls for restrictions against disturbance to known breeding areas for Boreal Toad. I am uncertain whether the Forest Service has an adequate inventory of breeding sites for this species to be able to effectively implements this Guideline. If they don't then you need another action to complete an inventory.

Pg 33 - FW-OBJ-SPEC-28 - calls for identifying places where illegal motorized use is impacting At-Risk plant species within 3 years. It then says they should fix those problems within 10 years. That doesn't seem like a very ambitious goal. There shouldn't be that many areas where this conflict exists. Once they are found the typical remedies of blocking off illegal routes signing and occasional monitoring patrols are not difficult or expensive. It doesn't take much illegal vehicle use on sensitive plant species to impact them significantly. This Objective should be moved up to a 3 or 5 year timeframe.

Pg 36 - FW-OBJ-SPEC-38 - says within 10 years to identify and close (seasonally or permanently) motorized routes that are duplicative, redundant or illegal that are within 2 miles of Sage Grouse leks. The transportation plans should have done this already so there shouldn't be many of these. Again, these are not difficult or expensive to close so the time frame should be shortened.

Pg 39 - FW-STND-SPEC-55 - talks about limiting ground based equipment in perennial streams or adjacent

riparian areas in certain areas to protect Green Lineage CO Cutthroat Trout. This is to prevent sedimentation from impacting breeding, incubation and emergence. Knowing that sedimentation is a big problem after wildfire do we need another Standard that prioritizes BAER operations in these areas after a wildfire?

Pg 54 - FW-DC-LSU-01- Land Conveyances - Bullet 1 - says that one of the criteria that can be considered for disposing of Forest land is to support the development of affordable housing. Clearly there is a need to support affordable housing in the region. But there is the potential for a slippery slope here where conveyances can be justified to support sprawling development in surrounding communities. There is a value in having municipalities learn to live within their limits without cutting into Public Lands to resolve their problems. Such development also has the potential to increase the wildland urban interface exposing more residents to wildfire danger.

Same area - A section should be added to address Trespass. Structures and facilities built on Forest Lands without authorization should be removed at the trespasser's expense and the area should be reclaimed to a natural condition as much as possible. Clearly there are some cases, such as access to private property, where the mechanism is there to authorize access. If the Forest would be inclined to normally permit the activity then the trespass should be brought under compliance. But the FS should not be very generous in resolving trespass situations where it is incumbent on the trespasser to survey the boundary of their property and ensure that their activities stay on private lands.

Pg 55 - FW_GDL-LSU-04- last Bullet - Historic access should be defended when possible. Such corridors should be proactively identified and historic records should be compiled to be able to document historic use to make such cases easier to defend.

Pg 60 - FW-OBJ-REC-06 - eliminating 2 unauthorized motorized travel routes over 10 years time is not a very ambitious objective. The rules about what is open and what is not are clear. There isn't a complicated need for decisions and public input. The longer an unauthorized route is used the more of a constituency for its existence is developed and the harder it is to close. I would encourage you to aim for a more ambitious closure of 2 routes each year for the life of the plan.

Pg 63 - FW-GDL-REC-14 - requires overnight visitors to use Bear Proof Containers for food and refuse 'when and where necessary'. This seems like a ridiculous and unenforceable standard. How is the public supposed to know when and where BPCs are necessary? Bear activities and problems change from year to year and place to place. The FS clearly doesn't have enough enforcement capability to apply this rule. A smarter guideline might be for the Forest Service to place a priority on informing the public with signing at trailheads and online information when they know there are bear problems in a particular area. When campers know this they are much more likely to voluntarily tie up their food or use BPCs. There is no sense in making rules the public has a hard time figuring out and the FS has a hard time enforcing.

Pg 63 - Table 8 - For summer recreation it appears that Alternatives B and C reduce Primitive and Semi Primitive Non Motorized acreage down from the No Action Alternative. There is an accompanying increase in Semi Primitive Motorized and Roaded Natural ROS acreage. It is not clear why. Alt D shows a significant increase in Primitive and a drop in SPNM though again I am not sure why. I think travel planning has been done on most of the forest units so there shouldn't be a lot of changes with new road building that would change ROS settings.

Pg 64 - Table 9 shows numbers for winter ROS goals. Pristine stays the same across alternatives. Primitive is the same from A to B, down in C and significantly up in D. SPNM is up in B, down in C and way up in D. SPM is down in B, up in C and way down in D. Roaded Natural is down a bit in B and D and up in C. I am not sure why you are setting goals for winter ROS settings for the Gunnison RD when they don't have a Winter Travel Management Plan done. It seems like the desired winter ROS settings should come out of a WTMP. At the very least they should be able to say that the winter ROS settings could change depending on the results of WTMP.

Pg 72 - There is no mention under Recreation - Forest Wide Guidelines of the need to develop a winter travel management plan for the Gunnison National Forest. That guideline should be included.

Pg 73 - FW-GDL-SCNV-05 - Timber harvest activities have the potential to significantly disturb scenic quality. Timber sale guidelines should require that contractors reduce slash and leave loading pads and other high impact areas in good condition by the time they leave - not only on Concern Level 1 routes but other routes too.

Pg 76 - FW-STND-TMBR-07 - this section says that clearcutting may be used when determined by the responsible official to be the optimum method. I am not sure this is specific enough. If you define optimum as what is cheapest and easiest for the contractor then you may end up with undesirable results. If you define optimum as necessary for natural regeneration or to achieve worthy ecological goals that may be acceptable. This needs to be defined better.

Pg 81 - MA-OBJ-WLDN-07 - calls for five wilderness boundary areas adjacent to motorized routes be signed within 10 years. That isn't a very ambitious goal. The FS should know where these areas are. Putting up signs is pretty cheap and easy. The Forest Service should do more projects in a quicker timeframe. They should also include places where mechanized incursions into wilderness is a problem not just motorized use. Since signs like that are regularly torn down by the public the standard should also include replacing or maintaining signs and not just a one time call for installing new ones.

Pg 89 - this portion of table 18 talks about standards for locating and designing roads in Designated Wilderness for authorized activities. I can't think of many activities outside of emergency fire fighting that would require the development of new roads within designated wilderness. Is a Minimum Tool Analysis required to ensure that roadbuilding, which is a clearly nonconforming use, is absolutely necessary?

Pg 98 - the Guidelines for Ski Area Management does not have any guidelines regarding the amount that local streams can be dewatered for snowmaking. In the Desired Conditions on the previous page it says maintaining the recreation values and Public Safety are priorities. Maintaining the integrity of natural processes is secondary. Climate change seems to be causing drier winters which means there is more desire to make snow to keep ski areas running. Dewatering local streams to make snow has impacts far down stream. At what point does it become too ecologically disruptive to dewater streams to try to make up for less and less snow?

The voters of Colorado approved a measure to re-introduce wolves into Western Colorado. It is reasonable to assume that some or all of the GMUG Forests could be identified as suitable habitat and could be the sites of re-introduction. Wolves would likely be considered a Threatened or Endangered Species requiring special management. I haven't found any mention of the need for management for the species, a suitability analysis of the best areas for re-introduction, the need for coordination with CPW for monitoring and management or the need to coordinate with ranchers to reduce possible predation etc. There should be a thorough discussion of this.

Pg 122 - in the section on monitoring Wilderness it is generally implied that the FS will monitor to protect wilderness conditions. One common way that wilderness rules are violated or wilderness conditions are degraded is encroachment by motorized or mechanized vehicles. I don't know if it should be stated as a separate monitoring goal or just mentioned under this goal but wilderness boundaries should be regularly monitored to detect unauthorized vehicle use and take management actions to curtail it.

For Alternative B you say that most salvage logging will be done in the first 5 years after the Forest Plan is completed. I am not sure it is reasonable to assume beetle kill will subside and salvage harvest will not be necessary after five years? You say you expect beetle kill to go down in most cover types but don't say why. Climate change is not going away anytime soon. It is higher winter temperatures and drought that seem to be major factors fueling beetle outbreaks. There are no indications that these trends are likely to change in the

future so why should beetle damage diminish?

Under this alternative they also call for harvesting 500 to 1250 CCF (Hundred Cubic Feet of wood) per year on lands classified as not suitable for timber production. Why? If it isn't suitable for production then there should be no production on those lands. You may be thinking of firewood gathering. If so, that should be stated.

Pg 180 - Forest Plan Objectives for Fuels - the standards for fuels reduction and Wildland Urban Interface (WUI) buffer zones may have been made years ago. As climate change has made conditions hotter and dryer I wonder if the standards have been updated to reflect the more extreme fire behavior we now see.

Pg 180 - Species at Risk FW-OBJ-SPEC-29 - encourages placing cameras to monitor wildlife impacts on endangered plants and possible mitigation. It seems important to include livestock and recreation in the monitoring and mitigation program as they can have significant impacts on endangered plants too.

Pg 191 - Appendix 4 - discusses protection and management strategies for Lynx. There is no mention made of wolf reintroductions and the possible effects this could have on Lynx. There is some evidence that wolves could prey on Lynx. Studies at Oregon State suggest wolf reintroduction may have a positive affect on Lynx by reducing coyote populations which compete with Lynx for food. Can Wolf reintroduction be managed to also benefit Lynx?

Pg 239 - The listing of numbers on Brown Capped Rosy Finch show only 4 records with the most recent in 2008. This data is ridiculously incomplete. This species inhabits places that your biologists rarely get to. I have personally helped to band several hundred Brown Capped Rosy Finches in the Gunnison area during the winters of 2017 and 2018. Similar efforts were made in Telluride and Ouray. It is a safe bet that a number of those came from the nearby FS lands. CPW is conducting more in-depth breeding studies on this species and may be able to help you update your information. Ebird lists dozens of sightings of this species in the plan area including very recent ones.

Pg 337 - FW-OBJ-REC-03 - called for attention to trails and trail heads for 14 ers. This was removed because you said you didn't have the funding. 14ers are popular and get high use which will likely increase over time. It doesn't make sense to ignore these needs and hide behind lack of funding. What strategies to address these needs are within their budget or capabilities? How about partnerships with the Colorado 14ers Initiative or the Colorado Mountain Club or Volunteers for Outdoor Colorado? There aren't that many 14ers. Surely you can come up with something that can be done to accommodate use or resolve resource conflicts.

Comments on the Draft EIS Volume 1

Pg 15 - Issue 8 - Mountain Resorts - in Alternatives B and D Snodgrass is removed from consideration for ski area expansion because a variety of studies on avalanche and soil stability determine it be unsuitable for a ski area. But you leave it open for expansion in Alternative C - why? The avalanche danger and soil stability problems haven't changed. The natural hazards suggest it should be unsuitable in all alternatives.

Pg 17 - Elements Common to All Alternatives - 3rd Bullet - makes it clear the plan won't make travel decisions. It says "site specific travel decisions needed to bring travel plans in these areas into compliance with a revised forest plan would occur later". But the plan doesn't mention winter travel planning so there isn't a directive to do it. Isn't that contrary to nationwide direction that all units should complete winter travel plans?

Pg 23 - Second to last line - there is an obvious typographical error - SPNM should be changed to SPM.

Pg 29 - Forestwide Travel Management Decisions - says that specific travel management decisions are outside the scope of the Forest Plan. Summer travel plans are already in place but there isn't a winter travel plan in place

for the Gunnison NF. The plan shouldn't make winter travel decisions but should set guidance or standards that all units on the Forest should develop winter travel plans within a reasonable timeframe.

With regards to wildfire management something I didn't see was goals for rehabilitation after a fire. Climate trends suggest we should expect hotter and dryer climate conditions which has the potential to spark more wildfires on the forest. Given heavy fuel loads in some areas it seems like it is only a matter of time before we have to deal with a large wildfire on the forest. Do we need to spell out guidelines for rehab of burned areas to reduce erosion, promote regrowth, protect streams and water sheds, avoid weed infestations etc.? Are those things clearly laid out in BAER guidelines or do we need to spell out priorities for the forest?

Pg 117 - conclusions about the integrity of aquatic, riparian and wetland ecosystems seems to leave out lakes as an aquatic component. How many acres of lakes are on the forest? How are acidity levels and water quality? How natural are biotic components? How are they impacted by recreation, sedimentation and rising water temperatures?

This section also identifies several problems for aquatic and wetland ecosystems - roads and trails as stressors, departed connectivity, invasive species and vegetation conditions departed from norms particularly in lower altitudes. But the plan doesn't seem to propose any actions to improve these factors. It mainly says to take steps to prevent further deterioration. The plan may not make specific travel decisions but it can set an objective that in future travel planning the mileage of roads and trails in riparian areas be reduced or reconfigured to reduce impacts.

As water becomes a scarcer commodity as a result of climate change there will be more efforts to appropriate, capture and divert water from Forest watersheds. Does the Forest Plan need to spell out priorities or actions to at least carefully evaluate and oppose, if appropriate, efforts that would significantly diminish or degrade aquatic or riparian ecosystems?

Pg 118 to 127 - the comparison of environmental impacts on aquatic and riparian systems seems incomplete. It ranks alternatives based on their relative impacts. For example it simply says D has the least impact, then B has more, then C has the most impact. There is no analysis and very little description of what the actual impacts are. Is our understanding of potential impacts to important aquatic and riparian ecosystems really so poor that we can't make any attempt to quantify the differences in effects across alternatives?

Pg 139 - Top box. The associated species for Alpine Talus, scree, rocky slopes should include Brown Capped Rosy Finch.

Pg 147 - Table 77 - The Uncompahgre Fritillary Butterfly should be listed somewhere in this table depending on the level of confidence you have for its situation. The same species should also be listed in Table 79 on pg 148.

Pg 157 - Discussion of Lynx habitat and competing species should include a discussion of the effects of probable reintroduction of the Gray Wolf into this area.

Pg 216 - Impacts to wildlife for managing for Semi Primitive Motorized, Roaded Natural and Rural Settings should all include the potential impact of vehicles bringing in and spreading invasive species that can diminish the quality of habitat for wildlife.