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Comments: I have looked at a lot of the Draft GMUG Forest Plan and find a lot of it to be very interesting and reflective of people who care about the forest. Just to give you my two cents, I prefer Alternative D because it can be broadly described as the "special area emphasis" alternative, with more special area allocations, a smaller vegetation and fuels management program, more active and restrictive recreation use management, more non-motorized settings, and fewer areas allocated as suitable for timber production.

I have a few specific comments about the plan and they are below.

Timbering:

Alternatives B and C indicate that timbering is suitable throughout most of the Coal Creek watershed, above Crested Butte. In the early 1980s, the Town of Crested Butte adopted a Watershed Ordinance, in accordance with Colorado State law, to maintain water quality for the residents of, and visitors to, Crested Butte. Despite the use of best management practices, the production of timber and other forest products invariably reduces the quality of soils and watersheds and water resources to some extent (e.g., DEIS at pages 118, 120, and 127). These impacts also influence the condition of riparian management zones and groundwater-dependent ecosystems. Because timbering throughout the Coal Creek watershed, as depicted in Alternatives B and C, is inconsistent with the Town's four decade old Watershed Ordinance, which endeavors to maintain water quality, timbering suitability as indicated in Alternatives B and C should be discarded.

Alternative D indicates timber harvesting is suitable, throughout the north side of Coal Creek and Alternative A, existing situation, indicates timbering is suitable south of Coal Creek, in the vicinity of Splains Gulch and Lily Lake. Lily Lake is a very popular summer and winter recreation destination. On page 76 of the Draft Plan it states "Timber shall not be harvested on lands where soil, slope, or other watershed conditions may be irreversibly damaged, as identified in project-specific findings (36 CFR 219.11(d)(2))." (36 CFR 219.11(d)(2)) states "(2) Timber harvest would occur only where soil, slope, or other watershed conditions would not be irreversibly damaged;" Further on in (36 CFR 219.11(d)(2)) the document says, "the quantity of timber that may be sold from the national forest is limited to an amount equal to or less than that which can be removed from such forest annually in perpetuity on a sustained yield basis. This limit may be measured on a decadal basis." The document includes three paragraphs describing how this can be measured. The document does not state how soil, slope or other watershed conditions that may be irreversibly damaged, should be measured. Such a measurement system should be stated in the new GMUG Forest Plan. One such measurement should be maintaining a setback, from any timbering, of at least 500 feet, measured horizontally, from all creeks, rivers and water bodies. Such measurements should also include creating a baseline data set of water quality in all water bodies that could be affected by timbering, before the timbering occurs, and ongoing monitoring to document changes in water quality, to demonstrate that mitigation measures are, or are not, working and if not, additional effort needs to be made to bring water quality back to its pre-timbered, quality.

Wilderness:

The recommendations of the Gunnison Public Lands Initiative should be incorporated in the Draft GMUG Plan, except that a future trail between Gunnison and Crested Butte, on the west side of Whetstone Mountain, should not be a part of the GMUG plan because this is one of the few elk habitat areas that is not impacted by people.

Riparian Areas:

Page 18 of the Draft Management Plan, under Objectives, lists some actions that may be used to enhance riparian areas. One tool not listed is the removal of cows from riparian areas. The removal of cows from such areas should also be considered.

The highlighted portion of the Objectives section on page 18 says: "Where appropriate, integrate recreational goals into the restoration action." To help define "where appropriate," the following paragraph from RIPARIAN AREAS, Functions and Strategies for Management, Committee on Riparian Zone Functioning and Strategies for

Management, Water Science and Technology Board, Board on Environmental Studies and Toxicology, Division on Earth and Life Studies, National Research Council, NATIONAL ACADEMY PRESS, Washington, D.C., Copyright 2002 could be used:

"Although recreational use provides an excellent opportunity to foster stewardship of riparian areas, most recreational development in riparian areas lacks sound ecological assessment and planning. Future management should combine careful design using a landscape perspective, limitations on certain uses that are incompatible with preservation or rehabilitation of riparian areas, and involvement of the local community and other stakeholders. The goal of managing recreational activities in riparian areas is to perpetuate natural functions (e.g., wildlife habitat) while still allowing human use and enjoyment of these areas."

#### Native Species Diversity

The Native Species Diversity section, beginning on page 26, fails to address wolves, which were native, until eradicated by humans and which the people of Colorado voted a year ago, should be reintroduced. It seems this section should address the habitat necessary for the successful re-introduction of wolves.

#### Native Species Diversity:

The Standards portion gets very specific about installing vent caps for birds. The management portion talks about connectivity and working with the Colorado Department of Transportation, among others, to in part, avoid wildlife-vehicle collisions. Another specific tool could be construction of highway overpasses to allow wildlife to cross highways, without interference with cars and trucks. There are many areas where deer and elk are common, right along state and federal highways, which have high volumes of traffic. One particularly appropriate location may be over State Highway 135 where the highway creates a barrier between the Almont Triangle winter range for Rocky Mountain Sheep, deer and elk and the East River, a source of water throughout the winter.

#### Trails

In the trail section on pages 77 and 78, it seems a second objective could be added to the Objectives section, to be consistent with the Big Game Species section on page 29, such as the following:

\*New trails may only be approved in locations that provide necessary access while maintaining relatively undisturbed high-quality habitat blocks-greater than 0.62 mile (1,000 m) from open motorized system routes and 0.41 mile (660 m) from open non-motorized system routes-sufficient in size to provide necessary security areas for populations of big game and other species. Relatively undisturbed migration and movement corridors should continue to exist across the landscape that provide sufficient security and habitat quality to allow for relatively unabated movement of big game and other species.

#### Climate Change:

The Draft GMUG Plan does not adequately address climate change. For instance, timber sales should all document how much carbon will be released by cutting trees and how the Forest Service plans to keep the timbering from resulting in any increased carbon in the atmosphere. Wilderness areas will continue to sequester carbon and the amount of wilderness proposed in all Alternatives is therefore, inadequate, too small. In Appendix 2, Proposed and Possible Actions, Forest Plan Objectives, beginning on page 179, there is not one Objective to address climate change.

#### Mixed Uses:

The draft GMUG Plan should give more direction on how it will manage new mixed uses for recreational vehicles, including e-bikes, ATVs, side-by-sides and more.

Thank you for the opportunity to comment on this Forest Plan.