

Data Submitted (UTC 11): 11/25/2021 6:29:16 PM

First name: Tony

Last name: Hoag

Organization:

Title:

Comments: I stand firmly opposed to the lack of guiding principal and lack of actions for the forest in terms of ecological sustainability and the effects of climate change in the recent Draft proposal for the GMUG Forest. Throughout the document there are inconsistencies, generalities and plans that do not fit a changing hotter, drier world due to climate change. There are also long term plans for forest management- tree cutting and harvesting- that clearly illustrate this point.

The plan is to cut 3000 acres per year on various habitats including steep slopes. The plan does not address the fact that in the same document the long term trend for the forest is the potential to have dramatic habitat change and potential loss of 50-99% of the forest habitats in 50 years (someone might say well that is a long time and this document doesn't plan for that long of a period of time- well the old plan covered management on the forest for 36 years! Plenty of time to see the dramatic changes on the forest take place.

In the first pages of the new plan this phrase was written:

Ecological sustainability is the foundation of the plan, which is why it is featured in Part 2 of the draft revised plan, ahead of ecosystem services and multiple uses.

If this statement was true the GMUG Plan would have addressed the effects of climate change on the forest habitats, ways to combat climate change on the ground from small sites to watersheds and the forest. There would be guiding language for the GMUG Forest employees so they knew ecological sustainability was the standard and not just a catchy phrase thrown in the leading paragraph of the plan.

The Plan also inserted this language:

In addition to their own intrinsic value, these ecosystems also support critical services-such as clean water, clean air, and healthy soil-and multiple use opportunities, the continued provision of which necessitates managing and maintaining their structure, function, and composition.

As a function of water management the plan states:

Protecting and sustaining these watersheds provides a high-quality, local source of 1.9 million acre-feet of water that is consumed by the population of western Colorado and the southwestern part of the United States and sustains the region's ecosystems and wildlife habitat.

How is the Forest going to protect the 1.9 million acre feet of water the forest watersheds produce? Are there action items identified to enhance water absorption in the watersheds? Will cutting 3000 acres of timber per year going to have a (-) effect on watershed water holding capacities? Are there plans identified in this document to increase natural water storage in areas of large scale vegetation treatments? NO!

Riparian areas are critical water storage areas and act as corridors for wildlife. Are there actions identified to protect riparian areas from the hotter, drier effects from climate change?

Prohibiting grazing in or around riparian areas to protect the fragile resource, to keep riparian communities functioning and storing the decreasing amounts of available water? In light of climate change does the plan need to protect more of the riparian areas to capture and store water in its natural aquifers. Is there any language in the plan that addresses this management technique?

Reintroduce beavers that could naturally dam local creeks expanding water holding capacities of the watershed

much like Leopard Creek has been doing above Placerville is one management activity that could have long term water impacts on the forest.

Mapping and identifying fragile resources in a watershed where vegetation management/logging activities should be sharply limited or prohibited to protect the watershed resources is another planning tool.

Healthy soil

Climate change will have a strongly (-) effect on soils as the temperatures rise and precipitation events are less predictable and more droughts occur. Intact plant communities maintain much healthier soils. Degraded ecosystems of weeds, annuals, and decreased native species cannot hold soil resources in place.

What has the GMUG Plan specifically identified in terms of action items to protect this most valuable resource- soil- of which all other life on the forest is dependent?

Many more activities like the ones proposed above would fall under a guiding principal of Ecological Sustainability if the Forest. The GMUG Forest must put forth this principal and use it to guide management activities on the ground for the coming years.

The GMUG has one of the largest rangeland resource bases (nearly 2.4 million acres) of any national forest in the United States, with about 51,000 permitted cattle and 27,000 permitted sheep. The GMUG's grazing program contributes to the economic feasibility of ranching and the socioeconomic sustainability of local communities

How has the GMUG adapted language in the plan for ecological sustainability while managing 78,000 animals use of the forest? Granted the GMUG Forest plant communities are in better shape than they were in the early 1900's, but is their structure and composition representative of a community that can be grazed with a drier and hotter climate? Was the forest managed effectively to sustain ecological integrity in recent years? Many sites throughout the Forests have been grazed so long and to such a degree that the native plants have been replaced by invading species and earlier successional species. In terms of riparian communities the grazing community has been allowed to remove a large proportion of the woody/shrubby community along creeks (willows etc) and many of the streams do protect stream banks.

This plan needs to provide management direction for long term ecological sustainability in terms of grazing management. The forest lands are the public lands and the permittees are the renters of our land. The GMUG Forest MUST put in plans that allow management activities to sharply control or prohibit grazing practices wherever they are identified as ecologically unsustainable. Components of water, vegetation and soil must be accounted for in these plans and grazing needs to be 'SECONDARY' to the ecological health of the forest. This is even more important as the climate continues to be hotter and drier.

Table 1. Desired conditions for seral and structural stage distribution and fire regime by ecosystem at the Forestwide scale Lack of recognition of any vegetation type other than Tree/shrub communities. How is the Forest Planning to achieve the 'desired' conditions and seral stages?

FW-DC-ECO-03: Despite changing and uncertain future environmental conditions, ecosystems maintain all of their essential components. Areas of rapidly changing climate support functioning ecosystems dominated by species native to the context area¹, though perhaps new to that specific location. Areas of climate refugia continue to support species historically present; have high ecological integrity, are resilient to future conditions, allow for species migration, and have low or no undesirable anthropogenic impacts.

Climate change is recognized in the document, but no actions for sustaining ecosystems/vegetation communities/wildlife populations due to climate change are included in the plan even though Ecological sustainability is identified as the foundation of the plan. Climate change is happening now and steps to counter it

are important to identify and ways to ameliorate the effects on the GMUG Forest need to be planned for NOW. These steps to identify, and plan for climate change are a necessary and critical component that is seriously lacking in this Planning document.

In addition I would like to :

Support Baldy and Bear Creek as recommended wilderness (additions to the Uncompahgre Wilderness)

Support Bear Creek as Wild and Scenic River eligible

Oppose the excessive acreage found suitable for timber harvest/logging

Support the identification of bighorn sheep as a Species of Conservation Concern.

I support the wilderness and special management proposal put forth by the citizens conservation proposal.