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Organization:

Title:

Comments: To: The GMUG Supervisor and Planning Team

From: Joan May, private citizen, public land owner

Re: GMUG plan revision comments

November 26, 2021

Dear GMUG team,

You are tasked with a monumental goal: To plan for the future of three large forests under one management scope. Since the Grand Mesa Uncompahgre and Gunnison's plan was adopted in 1983, and amended, but as yet never revised, so much has changed on the forests of the western slope of Colorado. Obviously the climate has changed in ways that forest managers of 40 years ago couldn't have imagined in their wildest dreams. It's incumbent upon current planners and managers to address how our forests can be frontline leaders in carbon sequestration to keep heat-trapping gases in the ground and in vegetation, and out of the atmosphere.

Additionally the size, character and economic drivers of human populations have changed in transformative ways since 1983. The financial security of communities on the western slope are-especially in forest-gateway communities- as reliant now on outdoor public lands recreation as they once were on timber and mining.

According to Colorado's Office of Economic Development and International Trade, Colorado's outdoor recreation economy generates \$37 billion in consumer spending annually, and contributes 511,000 direct jobs. Economic studies, referenced in the comments you received from the Outdoor Alliance, determined that human-powered outdoor recreation in the GMUG generates \$392 million annually.

The forest plan must recognize, address and incorporate this drastically altered socio-economic condition into the revised Plan.

With some of the healthiest wildlife habitat in the state, and some of the highest growth in demand for preserving the wild character for more and more recreational visitors, along with the imperative need to utilize our only remaining large swaths of land for carbon sequestration and habitat protection, the GMUG is clearly best suited for a conservation approach. Yet all of the alternatives in the draft EIS emphasize timber production over every other use. Species of Conservation Concern analysis, specifically required in the 2012 Planning rule isn't adequately utilized in the draft Plan. Bighorn sheep among other important species (including those listed in the comments of Defenders of Wildlife) must be included as science dictates.

I know that emotional pleas don't change forest plans, but I have to share my dismay at the direction the revision process has gone. My perspective, as someone who has lived on the boundary of the GMUG for 34 years. As such, I have been involved in each step of the GMUG plan revision since participating as the Executive Director of Sheep Mountain Alliance in the 2005 "Mountains to Mesas Citizen Alternative," which became the building blocks of the San Juan Mountains Wilderness (now CORE Act.) I then participated as the local government official on the 2012 Planning Rule FACA committee for five years. And, along with my fellow board members on the San Miguel County Board of Commissioners, we thoroughly reserved and subsequently submitted the San Miguel County conservation-minded comments to the 2018 draft revision. I have been driven in each of these steps, and now as a private citizen, by deep appreciation and reverence for the importance and value of public lands to be managed in ways that don't alter the landscape to the degree that even the so-called "conservation" alternative in the Draft would change our forests.

The 2012 Planning Rule recognized that land management planning for National Forest System lands cannot

occur in isolation: the resources, species, and issues for which those lands are managed are often cross-boundary in nature. Plans should provide a collaborative and science-based framework for land management planning in order to sustain and restore ecosystems and watersheds, protect wildlife, respond to a changing climate, and connect people to National Forest System lands. To include 757,800 acres of suitable timber, even in your "conservation" alternative (Alt D), represents almost 300,000 more acres than is found suitable in the current Forest Plan. This is a giant step backwards, not forward, in protecting our climate, supporting local economies, and enhancing quality of life. This potentially huge amount of acreage to be cut is incompatible with many other uses of the GMUG. In areas of the draft where production isn't shown to be compatible with desired future conditions and objectives of the plan, the land should not be included as suitable for timber production.

Chapter 60 of the 2012 rule specifically states that "Lands on Which There is No Reasonable Assurance that Lands Can be Adequately Restocked within 5 Years of Final Regeneration Harvest should not be found as suitable." In many areas listed in the Draft as suitable, there lacks sufficient evidence that erosion would make reforestation possible.

Chapter 60 of the rule also states that "Lands on which Technology to Harvest Timber is Not Currently Available without Causing Irreversible Damage" should also not be found as suitable. Many areas found as suitable in the Draft are not adequately justified in the draft. These areas are outlined in the High Country Conservation Advocates et al comments, and I won't repeat them here.

One of the fundamentals in effective use of scientific information is transparency in how it is used. The 2012 Planning Rule requires the Forest Service to document and summarize how the universe of best available scientific information was identified and how it informed the planning process. Justification for forest thinning isn't adequately explained for the different conifer species in the Draft.

Another area of the Draft that is especially troubling is the reduction in wilderness recommendation. To reduce the amount of recommended wilderness to 34,000 acres from the 2007 draft recommended 125,000 acres is unsupported and is presented in the draft without scientific justification. One can only assume that political influence has informed the wilderness inventory findings. The 2012 planning rule is explicit that public input-not just local government input-and Best Available Scientific Information, should be taken into account in wilderness recommendations. The DEIS should take into account the well-researched wilderness recommendations from the Citizen's Conservation Alternative. By all these standards, the Gunnison Public Lands initiative (and other suitable areas) should absolutely be included in the Draft.

Sixty percent of the county where I live (San Miguel) is public lands. Public lands recreation and tourism are virtually our only economy in this and neighboring counties, an economy that is booming. Yet most people probably don't know what jurisdiction oversees the land on which they are recreating. As human population growth continues to explode on the western slope of Colorado, as climate change continues to transform the landscape in ways that were unimaginable just a short time ago, and as new toys take people further and further into the backcountry, this planning process and our public land managers must be extremely forward thinking in envisioning desired future conditions of the land. Conservation should be the guiding principle of this Plan. Yet what all the alternatives in the Draft propose is the opposite: More lands suitable for timber than is justifiable by science or socio-economic values; less wilderness protection, and, in the Forest Service's preferred alternative, insufficient acknowledgement of the need for Special Management Areas.

Specifically, the East Beaver and Lone Cone areas of the Uncompahgre Forest should be included in recommended wilderness as was brought forth by the San Miguel County Commissioners in their 2018 comments. These areas have high characteristics that comply with important habitat and size requirements of wilderness. Compelling scientific basis for not including them is not explained. Social arguments to leave these out of the recommendations also do not exist: The Norwood Parks and Recreation District has been clear in its deference to the GMUG planning process and have stated that they will plan for recreational trails that will work

with conservation efforts. Indeed, it makes more sense to build new trails outside of a recommended wilderness boundary, closer to existing roads, where trail-building is more feasible.

Ophir should remain semi-primitive and non-motorized for winter travel and recreation. Extensive negotiations between the Norwood District Ranger, Town of Ophir, and citizens over many years have concluded that over-snow motorized travel in east Ophir poses extreme avalanche risk, disrupts the character of Ophir, and would have negative impacts on species such as endangered Lynx. Additionally, an east Ophir snowmobile destination doesn't make sense as an out-and-back route that doesn't connect to other recreational areas.

The use of e-bikes and demand for allowance of e-bikes on trails will surely explode in the very near future (as it already has in Europe.) The Forest Service must be decisive in creating clear limits for e-bikes that can have negative impacts on the lands, animal and plant habitats, and the enjoyment of human-powered recreationalists. Simply, the forest service should only allow e-bikes on roads and trails where motorized vehicles are already allowed.

I implore you to prohibit the use of drones in most conservation and recreation management areas. They are a nuisance to wildlife and to human rights to privacy.

The 2012 Planning Rule was designed to incorporate the concepts of adaptive management, scientific basis, and public participation into forest planning, acknowledging the need for flexibility and agility during times of change, and providing a stronger commitment to involving the public throughout the planning process. I appreciate the Forest Service's efforts to include the public and I hope that continues as the plan is amended over the coming years. The rule was also designed to require a holistic and integrated approach to management, recognizing that management needs for ecosystem resources are interrelated, and that management for ecological, social, and economic objectives are also interrelated. This needs to be better implemented in the GMUG Plan Revision.

In closing I'll note that I fully support the comments presented from the Conservation Coalition (HCCA, Defenders of Wildlife et al), Sheep Mountain Alliance, Great Old Broads, CO Department of Natural Resources, San Juan Citizens Alliance, and Outdoor Alliance who ask for far more emphasis on conservation and less timber suitability, as well as the letter sent to you from Gunnison, Ouray, San Miguel and Hinsdale Counties who opposed Alternative B.

Thank you for the opportunity to comment on this important planning effort.

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