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Organization:

Title:

Comments: I have lived in Montrose County for 34+ years. I enjoy hiking, birdwatching and backpacking in the GMUG. I am most interested in quiet, non mechanized recreation. This allows me to see birds and other wildlife, identify and appreciate wildflowers, recharge my mental health, and enjoy the outdoors with small groups of family and friends. I enjoy seeking out the unique and undisturbed areas of the GMUG, especially to observe unique native plant species. This includes searching for fens.

I appreciate that the Forest Service has an understanding of the uniqueness and fragility of fens. As stated on page 99 of the Draft Forest Plan, "There are approximately 4,000 acres of fens in the GMUG. Compared to other aquatic and riparian ecosystems analyzed in the 2018 assessment, fens have the highest sensitivity to physical disturbance." In fact, the Draft Forest Plan mentions fens 53 times, and there are 23 mentions in Volume 1 of the DEIS. These high altitude aquatic areas contain many plant and animal species that are rare and may be endemic to the fen. The threats to these plants and fens come from roads, livestock grazing, heavy trail use especially by all-terrain vehicles, and climate change. More needs to be done to protect these areas.

I respectfully disagree with the conclusion on page 99 of the Draft Forest Plan that "The condition of fens in the GMUG is generally good." I do not see evidence that the GMUG has completed enough inventory of fens in order to draw that conclusion. Therefore, I ask that the Management Approach that the FS "continues to inventory and evaluate fens and springs"(page 20 of the Plan) be changed to an objective to be completed in the next three years.

I feel that the following three statements from the Draft Forest Plan, which rely on different references, are somewhat contradictory. A better analysis of fens and their vulnerability to climate change is needed in the Final Plan/EIS.

"As grouped in the broader category of high-elevation groundwater-dependent wetlands, fens are expected to be low to moderately vulnerable to climate change". Page 99

"Fens in the GMUG face an uncertain future due to climate change. Changes in groundwater levels can have a large impact on fens, but changes in precipitation level can take time to translate into changes in groundwater levels." Page 99

"Fens in the GMUG are known to be moderately vulnerable to impacts from climate change, likely in the form of changes to precipitation regimes." Page 139

Iron fens are particularly unique. The Draft Forest Plan in Table 55 on page 142 states, "Iron fens, often with unique plant communities, are the only type of wetland with strongly acidic yet high calcium content groundwater support in the Rocky Mountain region." I bring to your attention the fact that the Ironton Fen above Ouray is divided by Highway 550. A fen divided is not well protected. I ask that the Forest Service consider the best protection for this fen.