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Organization:

Title:

Comments: Dear Forest Planning Team,

November 5, 2021

Thank you for the opportunity to comment on the GMUG Draft Forest Plan and Draft EIS. I know Forest staff members have been working on developing this for several years and appreciate the effort that went into its development.

I have lived in the Grand Valley since 2012 and spend most of my recreational time on the GMUG National Forest: camping, hiking, kayaking, fishing, cross-country skiing, snow-shoeing and bird watching. The quality of forest habitats for wildlife, water quality and recreation is vitally important to me and to the Grand Valley.

I have a M.S. in Zoology and spent 30 years working on natural resource issues on public land for the Forest Service, Bureau of Land Management and The Nature Conservancy, including developing three Forest Plans, and reviewing Forest Plans as a national appeals coordinator. I am very familiar with the planning process, including the new planning rule.

While I appreciate the economic value of timber management and livestock grazing to local communities; the greatest economic benefit from the Forest, as the plan states, is recreation. During this time of rapid climate change, the importance of the Forest watersheds to produce a sustainable source of water for domestic and agricultural use and to sequester carbon to mitigate the effects of climate change far outweighs any other benefit or output.

Climate Change

The draft Forest plan has a limited discussion of climate change effects and strategies, focused primarily on protection of infrastructure. With southwestern Colorado a national "hot spot" for climate change, more consideration of the GMUG forest as a carbon sink as well as for its contribution to 21 water supplies should be included in the plan analysis. An article in the Washington Post (August 7, 2020) identified the Western Slope of Colorado and the three adjacent counties in eastern Utah as the largest "hot spot" in the lower 48 states that has already exceeded a rise in temperature of 2 degrees Celsius, double the global average.

According to the article in the Post, this change in temperature, along with a 20-year drought, has resulted in a 20 percent drop in average flow of the Colorado River over the past 50 years. This trend is expected to continue, and yet the draft Forest Plan does little to acknowledge this reality. The focus of the Forest plan over the next 15-20 years should be on protecting watersheds and habitats for imperiled species, and sequestering carbon, rather than on

maintaining traditional lifestyles and economies, none of which are likely to survive under forecasted continued changes in climate.

What impacts will timber harvest have on water quality and quantity? How can the forest be managed to improve carbon sequestration? What impacts do prescribed fire and slash burning have on the regional carbon budget? How will the GMUG National Forest meet agency direction of the National Roadmap for Responding to Climate Change? These are some of the many climate-related questions that should be addressed in the final plan.

Timber Management

Every alternative in the draft plan posits a significant increase in suitable timber from current management (Alternative A: 468,00 acres) by including acres that were not previously considered feasible for timber management. Alternative B considers 948,000 acres as suitable; Alternative C: 975,000 acres; Alternative D: 757,000 acres. Designating these additional acres as "suitable" conflicts with consideration of responsible management of the forests for uses other than timber production, such as conservation of biodiversity and watershed protection.

[bull] Acres that are unfeasible for management should be considered unsuitable for timber production.

[bull] Steep slopes (greater than 40%) should not be considered suitable for timber production.

[bull] Lands uneconomical to harvest should not be found suitable for timber production.

[bull] Critical habitat for Gunnison Sage Grouse, a Federally threatened species, should be removed from the acres considered suitable for timber management.

Finding suitable those lands that cannot be harvested economically, or in some cases, that cannot be harvested at all during the life of the revised plan, leads to artificially inflated calculations for sustained yield limit, projected timber sale quantity (PTSQ), and projected wood sale quantity (PWSQ). It misleads the timber industry and the public, as well as present and future agency staff, about how much timber can or should be cut on the GMUG. It could lead to lands with trees actually suitable and feasible for timber production being overcut to meet an inflated PTSQ or PWSQ that was based in large part on thousands of acres of lands that cannot or should not be harvested during the life of the plan.

Rare and Imperiled species in the GMUG Forest Plan: Under the planning rule, the Forest Service is required to identify species of conservation concern (SCC), species that are imperiled but not listed under the Endangered Species Act, and provide ecological conditions to maintain their viability. The GMUG designated the boreal toad, brown-capped rosy finch, Nokomis fritillary butterfly, Gunnison's prairie dog, pronghorn, and 24 plants as Species of Conservation Concern. However, the draft plan fails to include several vulnerable species that deserve this designation. Some of these species include those whose habitat have been significantly altered by the spruce beetle outbreak and/or are threatened by logging, such as the American marten, northern goshawk, boreal owl, Lewis's woodpecker, and flammulated owl.

Canada lynx (Federally threatened): The draft plan weakens protections for Canada lynx. The spruce beetle outbreak radically altered lynx habitat on the GMUG. The current plan has strong protections for what was once considered the best lynx habitat on the forest before the large[shy] scale tree die-offs due to the beetles. The draft plan opens up what is now the best remaining

habitat for lynx to significantly more logging, without any scientific justification. The draft also removed a key standard that protects lynx habitat from excessive timber harvesting and salvage logging. It allows salvage logging to exceed the existing 1S% harvest limit within a Lynx Analysis Unit in a 10-year period. That provision

on top of the effects of beetle outbreaks could render existing lynx habitat unsuitable for lynx for many decades.

Gunnison sage-grouse (Federally threatened): The draft plan designates some critical habitat for Gunnison sage-grouse as suitable for timber management. These acres should not be included in the suitable timber base since timber management is not compatible with management of this species. The plan requires the Forest, within 10 years, to identify and permanently or seasonally close redundant and illegal roads that are within 2 miles of known leks. Since there are only 15 known leks on the Forest, and this is a Federally threatened species, this objective should be accomplished within 1-2 years, not 10.

Rangelands, Forage and Grazing

Although rangeland condition has improved over the past two decades, 29 percent, more than 400,000 acres are in fair or poor condition. The draft forest plan allows grazing utilization of up to 60 percent, with exceptions for higher utilization levels allowed. In general, grazing of more than 50 percent during the grazing period slows plant recovery and results in diminished grass growth. With the effects on vegetation from 20 years of drought, grazing utilization should not exceed 50 percent. Allotments in fair or poor condition should not allow utilization exceeding 40 percent during the grazing season to allow for recovery during these continued drought conditions. livestock grazing can have significant impacts to riparian and wet meadow ecosystems. The current vegetation condition and ecological integrity of all wet meadow and riparian shrub and woodland ecosystems are moderately departed from reference conditions. Of particular concern is the cottonwood riparian ecosystem with significant departure in vegetative condition. The draft forest plan has no specific livestock grazing standard to protect these sensitive riparian and wetland areas. A standard to limit livestock grazing, trailing and trampling stream banks within the riparian zone would go a long way in protecting these vulnerable areas. Reference to guidelines in a handbook do not offer the same measurable protection that a specific standard would.

Conservation Watersheds

I support the concept of Conservation Watersheds, however, additional standards to protect these watersheds are needed. The draft forest plan identifies 12 sub-watersheds with high quality habitat and functionally intact ecosystem as Conservation Watersheds to protect specific rare aquatic species. Eleven sub-watersheds are designated to protect the resiliency of green-strain Colorado River cutthroat trout and one to protect boreal toad. The only standard provided to protect Colorado River cutthroat trout in these watersheds is a limitation of ground-based equipment within the streams or adjacent riparian areas during spawning and

rearing periods, generally June through August. This standard is insufficient to protect sensitive

spawning beds from sedimentation, since it allows the operation of motorized vehicles and equipment both within streams and within riparian areas during the majority of the year. Cutthroat trout depend upon clean, sediment free gravel for successful spawning. Allowing vehicles and equipment to operate within an adjacent to these streams will increase in-stream sediment and prevent reproductive success.

The only standard provided to protect boreal toad is decontamination of equipment operating within the watershed. There is no protection from vehicles or equipment of egg laying habitat within the streams themselves. This species also requires clean gravel for successful egg rearing habitat. Vehicles and equipment should be restricted from operating within or adjacent to streams in this watershed to protect critical rearing habitat.

Wildlife Management

I support the concept of Wildlife Management Areas (WMA's) as proposed in Alternative D. The draft plan standard for WMA's is to limit new roads to no more than 1 mile per square mile and no new roads in those WMA's that exceed that limit. In order to reduce fragmentation, as stated as a desired outcome in the draft plan ("Habitat connectivity is maintained or improved as fragmentation by routes is reduced.") and to ensure security habitat for big game species, the final plan should eliminate roads that exceed a density of one mile per square mile in these areas and to maintain existing habitat blocks of 500 acres in size with no roads.

Special Management Areas

Alternative D includes 246,000 acres as Special Management Areas to protect unique wildlife, watershed or botanical features. These areas were proposed by multiple citizen proposals and endorsed by three counties: Gunnison, San Miguel, and Ouray. Special Management Areas would be removed from the suitable timber base and require a variety of motorized vehicle restrictions to protect their unique values. I support these designations as an important tool in protecting sensitive areas and unique features. Kannah creek is an area of particular importance to manage for watershed values as it is a main source of domestic water for the city of Grand Junction.

Wilderness Proposals

The draft GMUG Draft Forest Plan has four alternatives: Alternative A is current management, Alternative B, which was presented in the working draft, is a "blended" alternative, Alternative C emphasizes active management, and Alternative D emphasizes Special Area management.

Although Alternative B is portrayed as a "blended" alternative, it is hardly balanced between Alternatives C and D, having much more in common with Alternative C, the "active management" emphasis alternative than with Alternative D, the conservation emphasis. Alternative B's 34,000 acres of recommended wilderness is a small reflection of lands that could and should be recommended for wilderness protection. Alternative C recommends no new wilderness areas.

Alternative D recommends 261,000 acres for wilderness. This includes all areas recommended in Alternative B, plus the addition of all Gunnison County-recommended areas; and areas the GMUG evaluated as "high" (i.e. highly-qualified for wilderness) which are also recommended by two citizen proposals, the Community Conservation Proposal and Outdoor Alliance Vision. A true "blended" alternative would include at least 130,000 acres of wilderness, similar to what was recommended in the 2008 Draft Forest Plan.

A 2021 Report by Pew Charitable Trust, "Ecological Value of Lands in the Grand Mesa, Uncompahgre and Gunnison National Forest", identified 52 areas having the highest ecological value on the GMUG NF based

upon:

- * Total carbon storage
- * Climate resilience
- * Imperiled species richness
- * Vertebrate species richness
- * Ecological intactness and connectivity
- * Vegetation diversity

There is considerable overlap between these areas of high ecological value and the areas recommended for conservation protection by the Community Conservation Proposal lending additional support for placing these areas in protected status. Recommending these areas for wilderness designation would benefit both watersheds and wildlife and help mitigate impacts of climate change.

Wild and Scenic Rivers

I support recommending all eligible river segments identified in the eligibility analysis for Wild and Scenic River designation and protecting the qualities that make them eligible for Congressional designation. There are few remaining rivers in the Rocky Mountain West that remain free-flowing and relatively intact. Protecting these rivers protects water quality and aquatic species and provides recreational opportunities that are becoming increasingly scarce.

In summary, I strongly urge the GMUG National Forest to put greater emphasis on the ecological values of the forest in light of on-going and future climate change. Protecting water quality, maintaining habitats for rare species, and sequestering carbon all have heightened importance in the face of a warming climate.

Sincerely,

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