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Organization:

Title:

Comments: Grand Mesa, Uncompahgre, Gunnison Nation Fores Attn: GMUG Forest Plan Comments

2250 South Main Street Delta, CO 81416

Nov. 19,2021

Dear Forest Planning Committee,

Thank you for the opportunity to comment on the GMUG draft Forest Plan and draft EIS. I appreciate the years of work that has gone into the development of this plan and the efforts made by staff to obtain the most recent and accurate information. I've also appreciated the opportunities to engage with and learn from planning staff at Open House events, during webinars, and when asking them questions directly.

At present I am living in Grand Junction and have done so from 2010 to 2021. Earlier I lived on East Orchard Mesa from 1978 to 1987 and also lived outside of Cedaredge from 2000 to 2010 so have had multiple opportunities to explore and enjoy places on the GMUG forest. There are a number of conservation organizations that I belong to and I am currently the leader of the Grand Junction Area chapter of Great Old Broads for Wilderness. My primary form of recreation is hiking and I am also something of a bird watcher and amateur botanist.

Of the Alternatives described in the Forest Plan proposal, alternative D is the one I come closest to supporting, but I would also like to see many additions from the Community Conservation proposal incorporated into that Alternative description. There are several areas that were described in the Forest Service proposed 2007 GMUG plan as qualifying for wilderness designation that should be added to Alt. D. Kelso Mesa and Dominguez (above Little Dominguez should be added as they exemplify areas that are still in their natural state (untrammeled by man), are large, and provide opportunities for solitude as well as quiet exploration). The streams draining off of Kelso Mesa also contain a large population of the green strain of cutthroat trout, a species which deserves protection.

Rare and Imperiled species:

The Forest is required to identify species of conservation concern (SCC) and to provide the ecological conditions that will maintain their viability. While a number of plant and animal species were identified in the plan, the Forest failed to include others. Species such as purple martin, northern goshawk, Lewis's woodpecker, and both boreal and flammulated owl should be given SCC identification and protection.

I also ask that you reconsider and reevaluate the list of plant species that deserve protection and am included a document that shows plant species Identified by CNHP as needing protection. CNHP has identified 15 plants that should be considered for SCC status due to S2 and S3 ranking, 2 plants for which they have documented records of occurrence on the GMUG - which table 52 lists as not occurring on the GMUG, and 20 plants which should be listed in Table 53 due to criteria 1,3, and 4. I ask that these plants be considered for protective status. (Summary crosswalk with tables 51, 52 and 53) [Excerted table from scanned (mailed) hard copy letter can be found on pages 6-7 in BOX here <https://usfs.box.com/s/k9p1pzetpkws3xq26df0vojsq3jcoff8>]

Gunnison sage grouse numbers have significantly decreased and the plan identifies only 15 known lek sites on the Forest. Those 15 leks should be given the highest level protection, including the speedy removal of redundant and illegal roads found within 2 miles of the leks. The proposed plan requires the Forest to permanently or seasonally close the roads within 10 years. Because Gunnison Sage Grouse are a Federally threatened species, the road closures should be done as quickly as possible, within 1 to 2 years, not 10 years.

Canada Lynx, also a Federally threatened species, are living in what has been called on of the best lynx habitats in all of the Forest. Much of that excellent habitat as described in the draft would be opened up to logging which would be detrimental to lynx management and there is no scientific explanation given for such a change. The draft seems to have removed a standard that protected lynx habitat and then allows logging activity to occur. The lynx habitat protection standards should be reinserted into the draft.

Conservation Watersheds: Grand Mesa is the water source for many (21?) municipal and agricultural water systems and as such deserves a high level of water quality protection. The draft plan designates 12 sub watersheds as Conservation Watersheds, but then does little or nothing in the way of standards that would maintain the water quality in those watersheds. I live in Grand Junction, a community that has a watershed agreement with the Forest for the maintenance of water quality in the Kannah Creek drainage system for their municipal water supply. During this last year, the City has had to take water from the Colorado River to supplement our water supply. The facilities needed to treat the poor water quality of the Colorado River water do exist, but they aren't sufficient to reproduce the high level of water quality as it exists on Grand Mesa. At different times in my life I have irrigated with water from Lone Pine ditch or Orchard Mesa ditch, and at various times found there wasn't enough water available due to impacts from drought. Protecting the water sources on Grand Mesa in this time of significant impacts from climate warming is critical and demands stringent standards to measure and mitigate any negative impacts to water sources. Recently I drove up Lands End road and was shocked to see the increased number of people mountain biking on the upper portions of the Palisade Plunge trail. While I understand that efforts were made to limit the number of stream crossings the trail made, it was found that stream crossings were necessary in places. Cars, bicycles, cows, hikers, OHV's, equestrians, all raise dust as they travel - all adding sediment to streams. which negatively impacts fish and other aquatic species, the wildlife, and then humans as the water becomes part of municipal water systems. I urge you to incorporate stringent standards that will serve to control the amount of sediment added to streams.

Wildlife Management:

In alternative D, the concept of Wildlife Management Areas (NMA) is proposed and I definitely support this concept. Reducing fragmentation in these areas is of prime concern and both roads and trails cause

fragmentation. Limiting new roads to no more than 1 mile per square mile and no new roads in WMA's that exceed that limit is the standard in the draft plan and I strongly support that standard. I'm assuming you have seen and are using CPW's Document about planning for trails in areas designated for Wildlife. If there are roads in excess of the 1 mile per square mile, the final plan should provide a plan for eliminating the excessive roads and/or trails as well as maintaining existing blocks of 500 acres or more in size with no roads.

Special Management Areas:

Special Management Areas which will protect unique wildlife, watersheds, and botanical features are proposed in Alternative D in the amount of 246,00 acres which I definitely support and would like to see expanded to include the Mule Park Important Birding Area which has been proposed by Audubon, multiple citizens proposals, and endorsed by 3 counties. Logging should not occur in these (SMA's) and motor vehicle restrictions to protect their valued qualities will need to be put in place. Again I would mention the importance of protecting

the Kannah Creek area and managing it to preserve its watershed values for the City of Grand Junction.

Rangelands. forage condition and grazing:

The draft proposal document suggest that rangeland condition has improved over the past two decades, Yet during that time period much of the area of the GMUG forest has experienced increasing drought conditions which makes it harder for vegetation to maintain the needed nutrient energy to continue to grow and to reproduce new seed crops. Grazing of more than 50% makes it hard for plants to recover and results in diminished grass growth. Allotments with fair or poor condition should not be exceeding 40% during the grazing season and vegetation condition should be reevaluated yearly to determine the rate of recovery. .

Timber Management:

All the Alternatives outlined in the draft proposal listed a significant increase in the suitable timber when compared to current management and it appears that much of the land increase comes from designating acres that were not previously considered feasible for logging to now be so. The increased acreage was previously found to be unsuitable, was on steep slopes greater than 40%, or was found to be uneconomical for harvest so the decision to now include such lands does not seem to reflect responsible management of the lands. Even though my knowledge of best timber management practices is limited, I ask that you reevaluate the inclusion of the additional acres as being suitable timber.

Wilderness:

Only 34,000 acres at most, across the entire GMUG are recommended for wilderness and all of those lands are areas contained within the San Juan Wilderness bill. This small amount ignores tens of thousands of acres that were recommended by the 2006-2007 public revision process. The small amount also ignores the proposals for wilderness designation found in several of the citizens proposals which have been submitted for consideration as

well as comments from individuals advocating for protection for particular areas. I ask that you review the 2006-2007 information and reevaluate wilderness areas which were supported in those documents. Another document that should also be considered is a 2021 Report by the Pew Charitable Trust "Ecological Value of Lands in the Grand Mesa, Uncompahgre and Gunnison NF". This document identified 52 areas having the highest ecological value based on total carbon storage, climate resilience, imperiled species richness, vertebrate species richness, ecological intactness and connectivity, and vegetation diversity. This document adds additional support for placing protection status on these identified areas and designating them as wilderness.

Management for increased Recreation demands:

In recent years the Outdoor Alliance has done a series of economic studies that found recreation of all types on the GMUG generates approximately \$392 million in annual spending by those recreating as well as supporting local jobs and attracting businesses and residents to move to the area. During the most restrictive portion of the pandemic when people were asked to avoid contact with others many residents visited our public lands as a way to combat anxiety and tension. It appeared that many of these people have had limited experience in outdoor recreation as they often did not observe the guidelines for respecting the trails, the vegetation, or any wildlife they encountered. The draft proposal needs to include a plan for expanding trail head education efforts so that people recreating don't do damage to the environment. Many conservation groups have implemented actions to increase outdoor education, but the Forest needs to make a plan to expand their efforts to guide and participate in such educational efforts.

Climate Change:

The draft proposal has a very limited discussion of any strategies to counteract climate change effects. We who live in southwestern Colorado are experiencing ongoing significant drought impacts. The plan should include baseline information about current carbon stocks in the different land cover types so that future land management decisions can be based on that information. I ask that you include a section in the plan that contains baseline information about current carbon stock. To supplement this baseline information, I ask that you also include in the plan a monitoring process that would reflect progress or lack of progress in carbon sequestration. The information gained from such a monitoring system could be used to guide future land management decisions with the goal of making adaptive responses to future impacts from climate change conditions. It should be a goal of all future decisions related to the Forest that the aim be to provide additional ecosystem resilience. Maintaining habitats for all species, protecting water quality, sequestering carbon, and improving biodiversity are all goals which should be areas of focused effort in the final GMUG proposal, particularly in light of continuing climate change impacts.

Sincerely,

Sherry Schenk

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