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First name: Pauline

Last name: Reetz

Organization: Denver Audubon

Title: Conservation Committee Chairperson

Comments: Comments submitted as an attached file.

Gunnison/Grand Mesa/Uncompahgre Forest Plan

The following comments are submitted on behalf of the members of Denver Audubon, a grassroots conservation organization comprised of approximately 3,000 members in the Denver metro area. Our members have driven, hiked, camped, backpacked, photographed, marveled at the fall aspen color, and birdwatched on various areas of the Gunnison/Grand Mesa/Uncompahgre National Forest (the GMUG) and have the following concerns.

I. Water Resources. Climate change/global warming will pose a substantial challenge to water management on the GMUG in the two decades. The draft Forest Plan contains some excellent statements of desired condition (DC), standards, objectives and guidelines for Riparian Zone and Groundwater-Dependent Ecosystems, Aquatic Ecosystems, and Watersheds and Water Resources. We're particularly pleased to see that it includes re-introduction of beaver at some sites. Our concern is that the GMUG will not have the resources to do the monitoring and enforcement necessary to achieve these DCs. For example:

- The Riparian Management Zones/Groundwater Dependent Ecosystem sections, RMGD-02 to RMGD-05 posit DCs that "hydrologic processes function properly" (03); "biological composition of native flora and fauna support the associated ecosystem services" (02); "natural stream channel and floodplain is restored to dynamic equilibrium" (04); "normal patterns of recharge for groundwater systems" (05). (Plan p. 17-18).

In order to accomplish such conditions, the GMUG must have a complete and accessible record of water use permits that enable staff to calculate how much of the Forest's water is being diverted from its streams and how much is required to support riparian and aquatic ecosystem functions. Achievement of objectives will require that the GMUG fund staff and projects to accomplish the RZGD goals. Is there a plan to ensure staff adequate to monitor the results of projects to achieve these goals? Will the GMUG exert leadership needed to work with water users such as irrigators and water districts to achieve groundwater recharge, restore dynamic equilibria, and maintain the "biological composition of native flora and fauna"??

The GMUG needs to include objectives for monitoring water resource conditions and stream health, to ensure that goals and objectives are met, an objective to identify all water diversion permits and structures, and an objective to work with water users to ensure adequate stream flows and to restore stream health.. Without these, the plan is simply a statement of commendable intentions.

II. Native Species Diversity/At-risk Species

The Plan has no goals or objectives for monitoring and future management for species with unknown population levels or unknown trends in population levels. If the goal of the Plan is to maintain healthy populations of all native species on the forest, it should include an Objective for research and monitoring of such species within 5 years of adoption of the final Plan. A 10- or 20-year delay until the next Plan revision might find that such species have already disappeared from the GMUG. The Plan should also include an objective of re-evaluating at-risk species for inclusion as Species of Conservation Concern(SCC) for reasons given below.

II. Ct. Data used to determine Species of Conservation Concern are, for some species, seven or eight years old, e.g. for the northern goshawk, Boreal owl and Lewis' woodpecker. More recent data are most likely

available from Ebird, which we did not see listed in the References, and which has been used by the US Fish and Wildlife Service, the Smithsonian Migratory Bird Center, the Canadian National Wildlife Research Center, the Cornell Laboratory of Ornithology and the US Geological Survey.

The decision to not designate some species as SCC doesn't take into account important factors of their life histories. The Black Swift was rejected because of its broad range, but the species has very specific nesting requirements — cool, shaded, wet, usually under waterfalls, certainly a restricted ecological condition; and its diet shows a substantial dependence on the insect order Ephemeroptera, [“]winged adult forms of insects originated from aquatic habitats.[”] (Potter, Kim. 2013. Final Report to the Lois Webster Fund of the Audubon Society of Greater Denver. November, 2013). Only 16 nests have been located on the 2.9 million acre GMUG — surely an indication that the species is uncommon here. Its dependence on high-quality streams for nesting and food make it vulnerable to drought, and in addition to its vulnerability to climate-related declines in insect abundance and overall 94% decline in population, suggest that the species should be a SCC on this national forest complex.

Similarly, white-tailed ptarmigan are subject to a restricted ecological range — alpine tundra - and climate change is shrinking its habitat by the year. A case can be made that almost all of the avian species mentioned and rejected for SCC are suffering population declines, as documented in Rosenberg, et al, Decline of the North American Avifauna, Science 366, 120124d, 4 October 2019. That study indicates that western forest species have suffered a 29.5 percent drop in population, generally, tundra species a 23.4 percent decline, and grassland species a 53.3 percent decline. Designation of the Brown-capped Rosy Finch as a SCC might be fine, but other avian species with documented drops in population should also become SCCs.

Other species of concern to us: Lewis' Woodpecker, which occupies cottonwood groves in riparian habitat (also vulnerable to climate change, namely drought and catastrophic floods); the Western Purple Martin, which occupies mature aspen groves, also at risk from climate change and disease; and the northern goshawk, an occupant of mature forest. Overall, the analysis shows little acknowledgement for the impacts of climate change on these and many other species.

III. Increased recreational use of the GMUG. We have observed increasing numbers of dispersed campsites, many turning into bare, eroded areas, foot trails also subject to heavy traffic, increasing use by mountain bikers, deterioration of FS roads, and encroachment by off-road vehicle use. The GMUG will need increased regulation/education, temporary closures, possibly a permit system, and shorter periods of occupancy in campgrounds and dispersed sites, among other items, to get a handle on the increased use. The standards and guidelines in the Plan should help but improvement and restoration of resource damage will depend on budget and staff. A monitoring plan should be included in the objectives for Recreation, and there needs to be an acknowledgement of the growing population of users which will continue to put pressure on forest resources.

IV. Timber harvest. A check of the timber suitability criteria on P. 232 of the Plan reveals that the suitability analysis does not exclude areas that are least cost-efficient during step 2 of the suitability analysis process. We disagree with this; areas where income from timber harvest cannot cover the costs to the Forest Service should be excluded from consideration from timber harvest right at the beginning. The Forest Service has long subsidized timber harvest on the lands it manages; it is past time for this to end. Road-building has historically been the main method of subsidy; the Plan needs to discuss just where and how the timber harvesting process is subsidized on the GMUG.

This Suitability Analysis results in the inclusion of areas on slopes steeper than 40%, stands in remote areas, and other sites where timber harvest was not considered in the past. It's hard to see how an increase in timber harvest will benefit a forest in the era of a warming climate.

Timber harvest should be justified, not by the number of jobs it provides, but by the health and safety of forest

ecosystems in the face of a warming climate. The Plan should address:

- whether reforestation can succeed on sites that have been logged, given the forecast for warmer and drier climate.
- the GMUG contribution to carbon sequestration to alleviate climate change.
- the studies that indicate that after about two years, when needles have dropped, beetle-killed trees are no more fire-prone than live trees, which suggests salvage logging is not necessary.
- whether logging to reduce the danger of catastrophic fire is being carried out for that purpose or just to accommodate the timber industry, and the role of prescribed fire in reducing the danger of massive wildfires.

Denver Audubon categorically supports the retention of old growth forest, in part because there are bird species like the Boreal Owl and Northern Goshawk that depend on it, and in part because of the need to sequester carbon in the face of climate warming.

V. Wilderness designation

We support the recommendations of our sister chapter, Grand Valley Audubon Society to include the Wilderness and Special Management designations included in the CORE Act, and to identify the following four areas as possessing wilderness qualities and categorized/mapped accordingly in the Forest Plan:

Bear Creek & Baldy Mountain as additions to the Uncompahgre Wilderness

Hayden Mountain as wilderness

Abrams Mountain as Special Management Areas (or special interest area)

Kelso Mesa recommended wilderness

In addition Denver Audubon supports the adoption of Alternative D as the final Forest Plan for the GMUG.

Thank you for this opportunity to comment.