**Talking Points for Commenting on the GMUG Working Draft of the Forest Plan**

On June 17 the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) released the [Working Draft of the Forest Plan](https://www.fs.usda.gov/detail/gmug/landmanagement/planning/?cid=fseprd638482) for public comment. The GMUG is specifically asking for feedback on “what direction works, and what needs improvement.” **If you care about the future of your local national forests, today is a great day to help shape their long-term sustainability by commenting to the agency.**

Why Comment?

The [Working Draft](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd638492.pdf) is an early taste of the direction the Forest Service will be heading with their more comprehensive Draft Forest Plan, which will be released sometime this coming winter. The revised forest plan will set management direction for 15 years or more, so it is critical that it provide a conservation-prioritized, science-based foundation for future uses. The forest plan makes decisions for where new wilderness areas may be recommended, where commercial logging will and will not be allowed and how much volume can be cut, the intensity of recreation use on the forest, how the forest will contribute to climate change avoidance and adaptation, how wildlife will be protected, and so much more. **Simply put, if you care about the GMUG, and want it to be ecologically sound for generations to come, you should comment!**

***How to Comment***

Submit comments by July 29 to the GMUG on what’s working, and what needs improvement, in their Working Draft [by clicking this link](https://cara.ecosystem-management.org/Public/CommentInput?Project=51806). Please consider raising some or all of the following points in your comment:

Overall, the plan provides very weak, and in some cases non-existent, direction for protection of important resources. More standards, i.e., mandatory limits on action, need to be in the plan.

**Management Area Direction**

Wilderness and Areas Where Natural Processes Dominate (MA1)

* Frustratingly, only 22,400 across the entire GMUG are recommended for wilderness, all of it in areas contained within the San Juan Wilderness bill. Let the agency know that you support new wilderness areas, including those in the [*Community Conservation Proposal*](https://www.gmugrevision.com/).
* Page 59: MA-STND-WLND-09 has a good limit on party size in wilderness. However, it would allow exceptions if it “will benefit the wilderness character, or … is necessary for public health and human safety”. We do not see how a larger party size could possibly benefit wilderness character; in fact, with increased impacts from more humans in one area, it would degrade such character. Similarly, it is hard to imagine that a larger party size would ever be necessary for health and safety. Please remove these exceptions from this otherwise good standard. Recommended Wilderness (MA1.2)
* Page 59: we like STND-WLDN-10, which would ban drones from wilderness areas. Drones would degrade the wilderness experience for visitors, and violate the concept of wilderness, where recreation is “primitive and unconfined”[[1]](#footnote--1). It is entirely appropriate to ban drones. The GMUG needs to initiate outreach to recreationists about the need to not use drones in wilderness.

CO Roadless Area (MA3.1)

* The plan creates Management Area 3.1, which integrates the Colorado Roadless Rule’s direction into the draft revised plan. However, it is not clear how well almost 197,000 acres of roadless lands will be protected under the Wildlife Management Area designation where the two overlap.

Wildlife Management Area (MA3.2)

* We like the concept of a Wildlife Management Area (MA 3.2), especially one that has “[l]arge blocks of diverse habitat [that] are relatively undisturbed by routes” and one where “[h]abitat connectivity is maintained or improved as fragmentation by routes is reduced”. MA-DC-WLDF-01. However the one component under this MA besides the above-quoted desired condition would not accomplish the reduction in fragmentation and increase in connectivity. STND\_WDLF-02 would only prevent new routes if a route density of one mile per square mile was exceeded. There need to be more standards.
* What was the process/rationale for identifying these areas? Are there key places on the forest that you know should be identified as Wildlife Management Areas, but are not included? If so, provide detailed information about that.
* Page 61: MA-STND-WLDF-02: “To provide security habitat for wildlife species by minimizing impacts associated with roads and trails, there shall be no net gain in system routes, both motorized and nonmotorized, where areas are already in exceedance of the 1 mile per square mile limit as calculated within this management area boundary. Within the Flattops Wildlife Management Area on the Gunnison Ranger District, there shall be no new trail development. Exception: this does not apply to administrative routes.” This stated density is not very low. Impacts from motorized use are noted at a density of around half of that, i. e, 0.5 miles of roads open to motorized use per square mile. To truly protect wildlife, a much lower route density standard will be needed. The standard should also say that existing densities, where below whatever density standard is adopted, shall not be increased. As it reads now, it would allow all areas within this management area to have a route density of one mile per square mile.
* This MA must also protect roadless lands, as 196,700 acres of Colorado Roadless Areas would be managed under this MA. Draft Plan at 56, Table 8. More plan components are needed for this MA to ensure roadless lands are protected, as required by the Colorado Roadless Rule.

High-Use Recreation Areas (MA4.2)

* High Use Recreation Management Area – Give the GMUG credit for attempting to address the issue of recreation resource damage, but we’re still trying to determine the right approach.
* PMA-DC-HIREC-01: “To improve recreational experiences and curtail natural resource impacts, recreation management is focused in these areas.” – How is that actually implemented, and what does it mean for the rest of the forest?
* MA-OBJ-HIREC-02: “Within 5 years of plan approval, accomplish management actions in at least 10 noticeably degraded dispersed recreation areas (rated as an Overall Impact Rating of 6 to 8 using the National Minimum Recreation Site Monitoring Protocol), as detailed in Recreation FW-STND-REC-06. The standard REC-06 will be applied to determine when thresholds have been reached and more active management is needed. Priority areas include: Crested Butte, Taylor Park, and Existing campsites within the riparian management zone.”
	+ Are there areas near Ridgway that should be identified as priorities?

**Forestwide Direction**

Riparian Management Zones

* P. 19. STND-RMGD-09 would prohibit clearcutting in riparian management zones (RMZs). Additional restrictions are needed on logging in RMZ, not just clearcutting.
* P. 19, GDL-RMGD should be a standard. Mining for common variety (salable) minerals or mineral materials is within the Forest Service’s control, so mines should never be located in RMZs.
* P. 19: GDL-RMGD-12 should be a standard. Storage of fuels and other toxic chemicals, and refueling and maintenance of equipment should never occur in RMZs.
* P. 20: GDL-RMGD-20 should be a standard. Projects should always be designed to avoid “ditching, damming, dewatering, [and] flooding” fens and wetlands.

Native Species Diversity

* Species (General)
	+ FW-GDL-SPEC-07: To minimize habitat impacts and direct disturbance of raptors and migratory birds during nesting and winter periods, utilize buffers and/or timing restrictions based upon best available scientific information. – Should be mandatory.
* Big Game Species
	+ GDL-SPEC-17, restrictions on activities in big game production areas and winter ranges, is good, but it should be a standard.
	+ Page 27: STND-SPEC-15 would require the separation of bighorn and domestic sheep on active allotments of the latter. This is a good and necessary standard, as one of the biggest threats to wild sheep is transmission of disease from domestic sheep.

Watersheds and Water Resources

* Under the Planning Rule, each national forest/grassland unit is required to “[i]dentify watershed(s) that are a priority for maintenance or restoration”. 36 CFR 219.7(f)(1)(i). In the working draft plan, the GMUG only identifies one priority watershed. It is more than a little hard to imagine that there is only one watershed that should be prioritized for maintenance and/or restoration on a national forest unit the size of the GMUG.
	+ Are there any that you would recommend in the Ridgway/Ouray/San Juans area?

Recreation

* High Use Recreation Management Area – Give the GMUG credit for attempting to address the issue of recreation resource damage, but we’re still trying to determine the right approach.
* The plan contains dispersed camping standards, which is good. It also contains standards for responsive management actions in day-use areas. Sites damaged by heavy dispersed use might be rehabilitated.

Climate Change

* Climate change direction is lacking in the Working Draft Plan. We see little direction on responding to climate change in the draft plan. Under the Forest and Rangeland Renewable Resources Planning Act, the Renewable Resources Program (the Program) must include recommendations which “account for the effects of global climate change on forest and rangeland conditions, including potential effects on the geographic ranges of species, and on forest and rangeland products.” 16 U.S.C. 1602 (5)(F). The Program should be reflected in forest management plans like the GMUG

What Next?

Later in the review period, a series of public open houses will also be held in local communities from 5:00-7:00 p.m.:

* + July 9- Hotchkiss, Heritage Hall, 403 East Bridge Street
	+ July 10- Palisade, Community Center, 120 West 8th Street
	+ July 11- Montrose, Event Center, 1036 North 7th Street
	+ July 16- Norwood, Lone Cone Library, 1110 Lucerne Street
	+ July 17- Ridgway, 4H Center and Fairgrounds, 22739 US-550
	+ July 18- Gunnison, Fred Field Western Heritage Center, Van Tuyl Room, 275 South Spruce Street

If you don’t have a device to use the link [https://cara.ecosystem-management.org/Public//CommentInput?Project=51806](comment%20link) to comment, you can

* email: mailto:gmugforestplan@fs.fed.us
* Fax to 970-874-6698
* postal mail:

Grand Mesa, Uncompahgre and Gunnison National Forests
Attn: Plan Revision Team
2250 South Main Street
Delta, CO  81416

1. From the definition of wilderness in The Wilderness Act, 16 U.S.C. 1131. [↑](#footnote-ref--1)