



**Gunnison County Board of County Commissioners**

Phone: (970) 641-0248 • Fax: (970) 641-3061

Email: [bocc@gunnisoncounty.org](mailto:bocc@gunnisoncounty.org) • [www.GunnisonCounty.org](http://www.GunnisonCounty.org)

---

December 8, 2017

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

### **GMUG Forest Plan Revision Comments**

#### ***A. Overview***

Thank you for the opportunity to participate as a cooperating agency in the GMUG Forest Planning effort. We appreciate the significance and scale of the project undertaken by the GMUG Planning Team. Gunnison County cherishes its sense of community and place. We strive to preserve and promote the wellbeing of the County's citizens, natural environment and rural character. We deliver services and set standards that reflect our values and preserve our unique quality of life for present and future generations to enjoy. We are supportive of a multiple use approach towards the forest and its resources and understand the importance of public lands and the forest plan revision process because of the significant interlinkages between activities and resources within the GMUG and the quality of life, economy, recreation and landscape of Gunnison County. We would like to share some of the current collaborative efforts we have undertaken that we believe highlights how we emphasis working together to cooperatively achieve community goals.

#### **One Valley Prosperity Project**

In 2014 Gunnison County developed the One Valley Prosperity Project (OVPP) in partnership with the City of Gunnison, Western State Colorado University, the Towns of Crested Butte and Mt. Crested Butte, Crested Butte Mountain Resort, the Community Foundation of the Gunnison Valley and the Crested Butte South Homeowners Association. OVPP is a collaborative initiative focused on achieving a more prosperous and successful future for all of our Valley's communities from Gunnison to Gothic and developed a regional plan containing four interrelated focus areas which include Affordable Housing, Community Health and Equity, Resilient Local Economy and Sustainable Tourism and Recreation.

#### **Gunnison Public Lands Initiative**

Gunnison County convened the Gunnison Public Lands Initiative which is a coalition of ten local organizations representing ranching, water resources, motorized use, conservation, mountain biking, recreation, and hunting and angling. The goal of the coalition is to protect public lands, enhance a strong and sustainable economy, and support historic uses of public lands and is guided by the following principles:

- Appropriate balance between the wilderness, recreational, wildlife, ecological, economic, cultural, scientific, and scenic values of public lands
- Support for a strong, sustainable economy in Gunnison County
- Respect for historic uses of public lands
- Use of the best available science and all relevant information
- Desire to find workable solutions for all interests

### **Sustainable Tourism and Outdoor Recreation Committee**

We have recently created the Sustainable Tourism and Outdoor Recreation Committee (STORC) which is a stakeholder working group whose goal is to develop a collaborative and action-oriented approach to managing tourism and outdoor recreation within Gunnison County. STORC is intended and structured to be a wide-ranging group that acts thoughtfully, efficiently and proactively to address negative impacts and develops unique approaches to create a sustainable tourism economy and outdoor recreation experience while preserving the natural resources of our County. The purpose of the STORC is to work collaboratively to implement the following action steps:

- To complete projects, and implement programs and strategies which will result in a sustainable tourism and outdoor recreation economy that also sustains the natural resources and aligns with the community's values.
- To utilize renewable natural resources sustainably. To not threaten a species or landscape by over-use, and optimize benefits to both the environment and human needs.
- To develop a strategic plan to collaboratively set priorities, plan, and implement improvements in outdoor recreational assets.
- To prioritize areas and/or projects for collaborative effort and action, including, but not limited to: trail development and maintenance, sanitary facilities, camping management/improvements, trailhead improvements, parking, signage, river access, lake amenities, and wildlife resources
- To develop and/or maintain recreation infrastructure in Gunnison County to reduce and mitigate the impacts of recreation.
- To plan, implement and finance proposed improvements/projects through shared resources, identification and development of new funding sources and collaborative grant applications.
- To submit unified comments on recreation projects and/or related federal planning processes.
- To develop recreation infrastructure assessment.
- To oversee implementation of OVPP Strategy related to Sustainable Tourism and Outdoor Recreation.

### ***B. General Comments***

We appreciate that there are significant differences between each of the three forests that make up the GMUG. These individual forest areas have different impacts, needs and challenges. We encourage the GMUG Planning Team to develop as much specificity and recommendations for each area as possible, rather than treating the entire GMUG as a homogenous area with similar needs and challenges. We respect that other communities issues may be different than those we are

experiencing locally and do not wish to impede on those needs. We would like to receive more information about how those differing needs can be addressed in the Forest Plan.

An overarching theme throughout the assessments is the real and present threat of climate change. Climate change is a significant ecological and economic stressor and strategies from both a resource management perspective as well as a comprehensive development of policies to minimize and mitigate the contributors of climate change are an essential part of the forest plan revision.

Below please find comments on most sections of the forest plan draft assessments. We look forward to working with you throughout this process.

### ***C. Terrestrial Ecosystems:***

We agree with the key issue assessments and suggested changes to the forest plan indicated so that it:

1. Provides direction for ecosystem management to maintain ecological integrity as a whole, including maintaining of the existing diversity of ecosystems on the landscape and a variety of structural stages, including the protection and preservation of old-growth forest where present.
2. Provides direction for management in a changing climate while allowing for flexibility to respond to impacts of climate change utilizing the best available science
3. Focuses management actions to mitigate the impacts of known ecosystem stressors on the GMUG and prevents drivers from becoming stressors.
4. Allows and provides direction for ecologically sound uses of prescribed fire and wildfire in the plan area
5. Matches the variability found on the GMUG. Plan components related to snags and downed wood and minimum stocking standards need to be reviewed and updated where appropriate.

In addition, we agree that the more detailed explanations of the above items located in Chapter 4 of the terrestrial ecosystems assessment are appropriate and needed changes to forest plan.

### ***D. Aquatic and Riparian Ecosystems:***

Chapter 6 of the aquatic and riparian ecosystems assessment indicates some suggested changes to the existing forest plan in regards to aquatic, riparian and wetland and water development. It appears that lack of data has some bearing on the ability to create much specificity on the proposed changes. As the process continues we would hope to see more detail on the proposed changes to allow us to fully understand what is being proposed and how it will impact management on the GMUG.

### ***E. Watershed, Water and Soil Resources:***

Chapter 5 of the watershed, water and soil resources assessment indicated suggested changes to the GMUG forest plan which appear to be appropriate including the observation that forest plan direction should emphasis healthy forests and watershed conditions as these result in the best optimum long term water yield, water quality, magnitude and timing of flows and healthy aquatic

and terrestrial ecosystems. The Upper Gunnison River Water Conservancy District will be providing comment on this section as well and we support their comments and analysis.

**F. Air Quality:**

While this assessment is not available at this time we feel it is an essential element to forest plan revision and we look forward to seeing the draft and providing comment when it is available.

**G. Terrestrial Ecosystems: Integrity and System Drivers and Stressors**

There was significant discussion on system stressors in the Terrestrial Ecosystems analysis however we are looking forward to the specifics of this assessment section when it becomes available and will provide comment at that time.

**H. Invasive Plants Risk:**

In response to "Process, Methods and Existing Information Sources", Page 1.

Though the Gunnison County Weed Management Program also utilizes the state of Colorado Noxious Weed List as a guide for prioritizing management of these species, we request USFS' partnership in elevating the List C species cheatgrass (*Bromus tectorum*) as a priority for management in the Upper Gunnison River Basin. Big sagebrush plant communities that provide habitat for Gunnison Sage-grouse, ungulates that occupy these ecosystems, and grazing production on associated lands are readily invaded and degraded by cheatgrass infestations. Infestation levels of cheatgrass remain relatively manageable in the Upper Gunnison River Basin. Federal, state, county, municipal and non-profit partners of the Gunnison Basin Weed Commission have identified cheatgrass management as a priority and are coordinating efforts and resources to reduce introduction and dispersal of cheatgrass. We hope for USFS' continued partnership in this effort.

In response to "there is still a trend of increasing weed introduction and spread given limited resources for prevention and treatment.", Page 4

Thank you for the ongoing and active participation of the USFS-Gunnison Ranger District in the Gunnison Basin Weed Commission. Members of the GBWC recognize that resources for invasive species management are limited, and that we do our best work at limiting noxious weed introduction and spread when can coordinate resources, efforts and expertise. We hope for USFS-GMUG's ongoing partnership.

In response to "Infested Acres by geographic data" table, Page 6.

Infestation acreage estimate for scentless chamomile (*Tripleurospermum perforatum*) is low, and I wonder if this species' estimate is getting confused with that of corn chamomile (*Anthemis arvensis*). The two are similar in appearance, but I believe *T. perforatum* is the more prevalent species in the Gunnison Basin. As the Assessment notes, estimated infested acreages listed in this Table are most likely low in some cases.

In response to "A recent study indicated that the most effective management strategy is to focus on early detection and small infestation control strategies, not on large infestations, consider plan direction to strategize management accordingly.", Page 16

Please continue to work with partners of the Gunnison Basin Weed Commission to prioritize and coordinate addressing both large AND small noxious weed infestations in the Upper Gunnison River Basin. Coordinating expertise, resources and efforts leads to more success in addressing noxious weed problems at all scales and across jurisdictional boundaries.

***I. Carbon:***

We feel this is a good general report based on the current data the USFS has. However, there needs to be more explanation on how the carbon stock values were determined and a discussion of the limitations of those values. For example, what is the margin of error for determining the different carbon stock (i.e. Aboveground, belowground, standing dead, soil carbon, etc.)? The assessment refers to using the Forest Inventory and Analysis National Program but there was no explanation of how this census data is used to calculate carbon stocks. We also believe a section or two could be added that addresses uncertainties (with measurements, climate change, etc.) and future impacts on carbon stocks.

***J. Rangeland Management:***

The ability to graze livestock on Forest lands is an essential part of the economic viability of ranching operations and plays an important role in the agricultural economy of Gunnison County. We were glad to see in this Assessment that generally the range trend has moved in a positive direction, with only 1% considered in poor condition, compared with 38% in 1987. It was also good to see Adaptive Management in the Assessment, and we agree that it is a powerful tool. We would like to underscore that the efficacy of adaptive management depends on monitoring of indicators that provide information on trend.

With increasing recreational use and population growth on the west slope, there is potentially a growing divide among livestock operators and members of the public who also use USFS lands. Rather than see this as a negative, we would support efforts to bridge the gap. Members of the public and USFS staff alike would benefit from understanding more about range nutrition and the livestock industry, and we encourage USFS staff to pursue this type of education. Please consider collaborating with Colorado State University Cooperative Extension in developing educational materials which can bridge knowledge gaps between land managers and livestock producers and would benefit all collaborative public lands management.

We appreciate your thorough review of the literature on drought and projected impacts of climate change, and note that climate models predict a decline in productive potential. Studies suggest that changes brought by climate change are likely to impact resources on which ranchers depend, but that domestic livestock may not be the cause of grass decline in the future. Given climate alone, and irrespective of grazing management, grasses may decline, which will impact ranching operations, and potentially will lead to a reduction in AUMs. We suggest proactive conversations about drought, climate change, and likely impacts to avoid conflicts and impacting livelihoods for producers. We urge you to include ranchers in the discussion over climate change impacts to USFS lands. Ranchers have a lot of experience and knowledge of ecological systems, and can be important sources of information. Additionally, an inclusive process for deciding on desired conditions may help create buy-in for the resource goals.

***K. Timber and Vegetative Management:***

We support timber as an industry that supports the economies of communities on the GMUG Forest and forest health. There are particular benefits at this time with salvage of materials from the Forest that can then be utilized as a wood product while also mitigating some of the negative impacts of declining forest health. While the current timber harvest are above average for the GMUG over recent times in order to deal with the time sensitive resource availability, we encourage the GMUG Planning Team to consider how timber planning and management can be utilized over the long term as an even better management tool to promote forest health.

***L. Threatened and Endangered Species***

Although the assessment for threatened, endangered, proposed and candidate species, and potential species of conservation concern present in the plan area has not been developed we encourage the plan to strongly coordinate this assessment with plans and management plans for non forest service lands adjacent to the GMUG planning area to ensure that landscape scale protective measures and plans for species are coordinated and thus more effective for species protection.

***M. Benefits to the People: Multiple Uses, Ecosystems Services and Socioeconomic Sustainability***

We support the 2012 Planning Rule that the new plan “explicitly consider the Forest’s role and contributions to social and economic sustainability as well as ecosystem services.” With over 80% of Gunnison County comprised of public lands, the socioeconomic impacts of land use decisions on those lands are significant. The citizens of Gunnison County have consistently stated that use and access to public lands are essential to both their quality of life as well as the economy of Gunnison County. We do believe in a multiple use philosophy and believe it is essential to having a diversified economy. As stated within the assessment, the significant economic drivers of Gunnison County include Tourism, Outdoor Recreation, Hunting and Fishing, Agriculture, Mining, Oil and Gas, Construction, Accommodation and Food Services, Education, Health Services and Government which all have significant connectivity to the presence and utilization of public lands.

Of particular note is the section in the assessment discussing the federal payments to state and local governments through primarily PILT and SRS. We appreciate the understanding that, especially in counties that are largely comprised of federal lands, these are essential to providing labor and employment income which in turn provide a variety of services that support the use and enjoyment of the GMUG, including road and bridge infrastructure and maintenance, recreation infrastructure and emergency services. Ensuring the continuity of these payments is critical in the socioeconomic success of the GMUG and the surrounding communities.

The social sustainability and resiliency of the land management efforts on forest service lands within the GMUG are essential and we are pleased to see it as a point of emphasis and assessment in the current analysis of the GMUG forest plan.

***N. Recreation and Scenic Character***

Recreation and tourism are significant economic drivers within Gunnison County. Residents of the County place a high value on the landscape, views, access to nature and outdoor recreation. We have experienced significant growth in visitors and recreationalists in the past five years, and along

with that growth we have also experience some negative impacts related to sanitation, overcrowding, lack of infrastructure and resource damage.

Participation rates for the GMUG's top ten outdoor recreation activities noted in Table 17 in the Recreation draft assessment may not reflect significant growth in use that seemed to spike in 2015. The summer of 2015 saw a significant increase in visitors and resource damages in areas around Crested Butte and Taylor Park/ Pitkin areas that were cause of significant concern.

There appears to be some conflicting statements in this Assessment. Table 17 of the Recreation draft assessment notes that there was no increase in motorcycle use between 2009 and 2014, while there was a 5% increase in bicycle use in that same time period. Page 57 of the Recreation draft Assessment states, "Mountain biking, born in Crested Butte, is slowly losing ground in popularity to dirt bike use (where such use is allowed)." This statement seems to conflict with the survey data and it would be beneficial to cite a source for this statement.

Our experience is that there is a heavy motorized use in the Taylor Canyon and Taylor Park area, while there is heavy mountain bike use in the Crested Butte area. Areas, such as Cement Creek, are used similarly by both user groups. We believe it will be beneficial to plan for increases in both uses. The Gunnison-Crested Butte Tourism Association has focused much their summer marketing efforts around mountain biking in the Gunnison Valley and we do not see that this activity is shrinking or being outpaced by motorcycles. We agree that there are significant numbers of motorcycle users that would like to see their experience improved and maintained on the Forest.

There seems to be conflicting statements in the Recreation draft assessment related to camping in established campgrounds and dispersed sites. Part of the Assessment notes that fewer visitors seek to camp in campgrounds another section states that the demand for developed sites in close proximity to services and safety are increasing. We see a demand for all types of camping— established campgrounds and dispersed sites. There are not enough camping sites in the Crested Butte area to accommodate current demand and we expect this problem to continue to grow.

Rather than closing camping sites that do not meet Forest Service health and safety standards we urge you to seek collaborative partnerships to improve facilities that likely provide much needed camping sites on the Forest. We see a need to add bathroom facilities at many locations in Gunnison County.

We agree that the recreation and visitor experience is being degraded by the lack of adequate facilities at many day use areas, campgrounds and trailheads, along with lack of maintenance and the continued growth in visitors to many of these sites.

We believe that it is critical that the Forest Plan begin to address prioritization of the most pressing issues where impacts are greatest and can also be mitigated through maintenance and installation of new infrastructure and amenities. Many of the areas that are being impacted most heavily (Crested Butte and Taylor Park) in Gunnison County area appeared to receive equal treatment in the

Assessment as areas that receive very limited use (Sargents Mesa). Areas being impacted by heavy use should have higher priority for maintenance and funding over other areas with fewer impacts.

The need for change in how we address growing numbers of visitors and their increasing demand for higher level services and amenities is important for mitigation of those impacts. The population of Colorado is projected to continue to increase and each year our public lands seem to welcome more visitors—some that are good stewards of the land and others that may not have the information to be good stewards. Education, communication and infrastructure are critical elements to protect our public lands from degradation and to maintain the high quality user experience that our residents and visitors expect.

***O. Renewable and Non-Renewable Energy Resources, Mineral Resources and Geologic Hazards***

1. P.1, Background. Draft states:

“Each type of energy or mineral resource within the plan area requires consideration of applicable laws, the jurisdiction of other Federal or State agencies, and valid existing rights, including non-Federal (that is, reserved and outstanding, or other private) mineral rights.”

Comment: Gunnison County, Colorado has asserted its legal authority, as a Colorado Statutory County, to regulate certain activities—including development of natural gas—on federal lands. This legal authority has been recognized judicially.

Gunnison County suggests that the Draft be modified to state: “...the jurisdiction of other Federal or State agencies, and local governments...”

2. P.1, Over-arching Direction. Gunnison County suggests addition of:

a. The mandate to consider and accommodate “multiple uses”; that is—uses in addition to energy and mineral resources.

b. Consideration of “non-development”—or “least intrusive” alternatives.

3. P.2, Key Issues. Gunnison County suggests the addition to “concerns and challenges of:

a. “Evaluation of compatibility of mineral resource development with other existing and reasonably anticipated non-mineral resource activities.”

b. “Consideration of development impacts over discrete time frames (e.g. immediate, near term, long term).”

c. “Consideration of ‘no development’ impacts alternatives in certain discrete geographies.”

4. P.2, Chapter 2 and P. 14 Coal. Gunnison County requests drafting of:

a. A section regarding “methane-capture/methane-use from coal deposit development.”

b. A section regarding “retirement” and “retirement phasing” of existing operations.

5. P. 17, Energy-related Infrastructure. Gunnison County suggests consideration of:

a. Support of infrastructure for the utilization of captured (e.g. otherwise released) methane from coal development.



6. P. 21, Abandoned Mine Lands. Gunnison County requests consideration of addition of an “Enforcement Mechanisms” section that would address “pro-active” mechanisms (e.g. financial security) for closure of existing mines; and would address “prioritization” of abandoned lands.

7. Total Maximum Daily Load. Gunnison County suggest an emphasis on the TMDL efforts, generally, and requests analysis, in this document, of prioritizing the various segments.

8. P.23, Other Leasable Metals/Minerals. While this scenario does apply to “a very small part... of the GMUG”, the document should note that where this development is occurring, the impacts can be consequential, so Gunnison County suggests current consideration of leasing restrictions. That is, development of leasing restrictions ought not be pushed back until “the next planning cycle.”

#### ***P. Infrastructure***

We support the key issues suggested within the infrastructure assessment but would like to see the prioritization of not only the maintenance but improvements for forest facilities and roads and preparing for not only the anticipated but the necessary demands for additional special use infrastructure such as the installation of fiber optic lines for broadband internet expansion and transmission facilities. We would encourage collaboration with local government and non-profits as well as private/ public partnerships to help accomplish these goals in light of apparent funding challenges.

Gunnison County is pleased that the Draft incorporates being proactive in the efforts to “streamline the process” for broadband expansion across the forest. The counties that the GMUG covers have been actively engaged in developing a more robust infrastructure for broadband development. There are many “hurdles” to overcome in order to provide services to the area that are competitive with other regions of the State and Country. This is a barrier to competing economically for our region. A streamlined process for permitting broadband and cellular infrastructure on Forest lands could be a catalyst in enticing more private sector investment of limited resources to our region. This is a key component in our attempt to bridge the gap in the “digital divide” that currently exist on the Western Slope of Colorado. It will also enable the FirstNet deployment for emergency agency communication to be more robust and help provide critical communication services to our first responders.

Some additional comments include:

On Page 1 – the comment under maintenance asserting that 4x4 vehicles are damaging the roads is probably true, but the assessment also needs to consider the increased use and speed

Pages 12-13 talks about transferring jurisdiction to, or entering maintenance agreements with public road agencies, which we assume might include counties. It is not specific whether any funding would be provided for maintenance agreements, or whether there could be some upgrade of the deteriorating condition before transferring jurisdiction. We are not aware of many counties able to assume another agencies problem.

In various paragraphs the assessment talks about obliterating roads after timber projects within 3 years. There has not been (and the plan does not address) the opportunity for public input before the roads are closed. It is possible they do not continue to be timber quality roads, but maybe the

road prism could be narrowed and a loop route for bikes (mechanized and/or motorized) could be created to disperse use in other areas. It would be good to consider different options.

On page 14 the assessment identifies an information gap of State and county plans for road construction and upgrades. We would like to see more specificity in what type of information USFS needs and how it will be of value. Unless the road provides direct access to a Forest road or public land we can't see it would matter.

***Q. Cultural and Historic Resources***

We agree that the cultural and historic resources within the GMUG, and Gunnison County in particular, are an integral part of the public's identity and relationship to their heritage. We also agree that properly managed heritage and cultural tourism, historic designations and historic rehabilitations are vital to state and local economies. We appreciate and support the suggested forest plan changes to respond to cultural and historic issues.

Gunnison County has developed a GIS database of historic resources (trails, roads, towns, mines, ranches, etc.) for the benefits that come from building a caretaking connection between people and the Gunnison Country landscape. Please contact Mike Pelletier, GIS Manager (970) 641-7645 for this information and for access to the wealth of other historic information contained in County records.

***R. Land Status and Ownership, Use and Access Patterns***

We support the assessments goals of prioritizing and securing access to the GMUG in the face of a growing trend of access across private inholding being lost and that non-recreation special uses should minimally encumber the forest. Additional comments are:

On pages 7 & 9 the assessment talks about forest access roads that the USFS does not have an easement for across private lands. There appears to be an intent to develop an inventory, but then what? The Green Lake Trail was used as an example, and it is a good one. The question is will the USFS assert the right of the public, and if so how can the process be expedited. If the process cannot be expedited then can the USFS remove themselves so other public agencies can assert without the Forest Service being a stumbling block.

Throughout the assessment there is information about the shortage of Realty Specialists and the impact that will have on securing access and land adjustments. It seems the training and/or recruiting for these positions needs to be one of the highest priorities if there is to be implementation of many of the options considered in this revision.

***S. Designated Areas***

While we feel the assessment report is generally adequate in its coverage of Designated Areas we feel that some comment is warranted to tease out some specific concerns and provide clarity to Gunnison County's comments.

Wilderness Areas:

Gunnison County has long supported the value that designated wilderness areas bring to the forest, this region and our communities. Ensuring protections continue and finding opportunities that support those protections and when appropriate adding additional wilderness protections has been

a constant discussion in Gunnison County. As outlined in this section, and earlier, the Gunnison County Board of Commissioners convened a local working group of diverse and interested stakeholders to vet the additional protections they desire in potential wilderness additions as well as other management tools such as Special Management Areas (SMA). Of concern and not directly addressed in the assessment is the critical interface of infrastructure that delivers users to the edge of Wilderness areas but seems to be disconnected from the management of Wilderness. We have concerns of the impacts of overuse, human waste, vegetation impacted by parking and general degradation of trailheads adjacent to Wilderness. We see this in numerous areas on the Gunnison National Forest, and believe these issues are consistent across the GMUG.

**Wild and Scenic Rivers Designation:**

We support the assessment and identification of the qualifying Wild and Scenic Recreation Rivers during this planning period.

**Administratively Designated Areas:**

Critical Habitat under the Endangered Species Act: Gunnison County has been a leader in sage grouse conservation for over 20 years and although habitat for this species occurs primarily on BLM and lower elevation sage habitat on private lands, it is imperative that the habitat on forest lands be managed cooperatively with other agencies and organizations engaged in Gunnison Sage Grouse conservation.

**Research Natural Areas:**

We feel the scientific research of the RNAs, especially Gothic, is of utmost importance to protect and management of impacts and volumes in and around these areas is of concern.

**Colorado Roadless Rule:**

Gunnison County has consistently supported the values expressed in the Colorado Roadless Rule.

Sincerely,



Phil Chamberland, Chairperson



Jonathan Houck, Commissioner



John Messner, Commissioner