

SAN MIGUEL COUNTY

BOARD OF COMMISSIONERS

HILARY COOPER

KRIS HOLSTROM

JOAN MAY

December 8, 2017

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

Submitted Via email: gmutforestplan@fs.fed.us; and Via online comment form with attachment:
<https://cara.ecosystem-management.org/Public//CommentInput?Project=51806>

RE: Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision #51806 Draft Forest Assessments

Dear Responsible GMUG officials,

San Miguel County appreciates the opportunity to provide comments for the draft assessments as part of the GMUG Forest Plan revision. This will be the first full forest plan revision in over 30 years. Sixty percent of San Miguel County is federal public land, with a significant portion being lands managed by the Norwood Ranger District of the GMUG National Forest. We value having a good relationship with the GMUG and our Norwood District, and working together in partnership as this plan will have significant effects on the county and its economy during the next several decades. The County has a Memorandum of Understanding (MOU) with the USFS Norwood Ranger District which recognizes the importance of a strong working relationship between land managers and the County.

In 2015, the San Miguel County Board of County Commissioners adopted Resolution 2015-009, "Publicly stating the value of public lands to the County's economy, recreation, heritage, and quality of life; and opposing any effort to claim, take over, litigate for, or sell off federal public lands within San Miguel County, CO."

San Miguel County has the responsibility for ensuring the public's health, safety and welfare, including environmental health within the County, consistent with applicable Colorado law (§29-20-104(1) (b) and (1) (h), C.R.S. The Board of County Commissioners has collaborated, cooperated, and coordinated with federal land agencies on numerous federal land plans and projects. We are active members of the Public Lands Partnership, Spruce Beetle Epidemic and Aspen Decline Management Response (SBEADMR) and the SBEADMR Adaptive Management Group (SBEADMR AMG), and the San Miguel Basin Gunnison Sage-grouse Working Group. Our Parks and Open Space Department, Open Space Commission, and Historical Commission work across management boundaries to protect, preserve and enhance open space, trails, and historic assets within the County. In 2017, San Miguel County provided \$4,600 to the "Alpine Ranger" program administered by the Ouray Ranger District on behalf of the Ouray and Norwood Ranger Districts. We provided an additional \$25,000 to the Norwood Ranger District "Recreation Ranger" program. Both of these programs exist to provide outreach, education, prevention of resource damage and increased safety for motorized and non-motorized recreational forest and "jeep-road" users. The popular 26-mile Galloping Goose Trail is jointly managed by the USFS and the County, offering hiking, biking and cultural opportunities on a spectacular historic railroad grade between the Town of Telluride and Lizard Head Pass.

We are grateful to the GMUG staff for holding a well-attended and successful public outreach meeting and poster presentation session in San Miguel County at the Telluride Public Library earlier this summer to introduce the planning process, assessment topics and get early public input.

We appreciate the ambitious timeline the GMUG is under to get a Record of Decision signed on the final plan in the fall of 2020. However, it is difficult for a small county to thoroughly review, digest and comment on such an important and relatively large volume of technical framing material within a 30 or 33-day period that includes weekends and the Thanksgiving Holiday week. For future comments, we look forward to coordinating with our neighboring counties.

During our review, members of the Board of County Commissioners and county staff kept in mind the questions that the GMUG said it hoped public comments would be focused on in the November 2017 USFS Guide to the draft assessments:

- *Are we on the right track with the information highlighted?*
- *Did we capture what's going well and what's not going well, or are we missing any critical pieces?*
- *And most importantly, do the potential needs for change reflect the major issues that we should concentrate on in plan revision?*

A sincere effort was made to quickly review the assessment documents and maps, along with the summary background contained in the poster .pdfs during the allotted time. Due to the limited time period and more than 750 pages of technical materials needing review, we reserve the right to refine, expand, clarify or modify our comments as we delve further into the technical details contained in these materials during the planning process. We are providing a few general comments that might apply to the assessments overall and comments specific to each topic required by the 2012 planning rule and relevant draft assessment documents and supplements.

GENERAL GMUG DRAFT FOREST ASSESSMENT COMMENTS:

The assessments we reviewed were downloaded approximately November 13, 2017, from the <https://www.fs.usda.gov/detail/gmug/landmanagement/planning/?cid=fseprd563243> web page. It would have been helpful to have these assessments along with the supporting documents at the bottom of this page available for download in a single zip file. It was time-consuming to download each assessment piecemeal. We did not locate all of the supplementary maps during our first web page visit but were able to find them linked to the master assessment table later. To help interested parties review maps, figures, appendices, documents, etc., all should be directly linked to the assessment web page and included in our suggested master zip file.

The assessment table that linked the draft materials to the relevant 2012 Planning Rule required topic on the web page is helpful. We made a few suggestions below of adding additional assessment references (red font) to some of the topics, as we found them relevant. The assessments that we located and downloaded were:

Assessment Topics Required by the 2012 Planning Rule (36 CFR 219.6(b))	Corresponding GMUG Assessment Report(s)
<p>1. Terrestrial ecosystems, aquatic ecosystems, and watersheds</p>	<ul style="list-style-type: none"> • <u>Terrestrial Ecosystems: Integrity and System Drivers and Stressors and Maps (142 pgs. + 5 maps)</u> • <u>Aquatic and Riparian Ecosystems (36 pgs.)</u> <ul style="list-style-type: none"> • Suggest also listing the Watersheds, Water, and Soil Resources (46 pgs.) which has complementary info and cross-references.
<p>2. Air, soil, and water resources and quality</p>	<ul style="list-style-type: none"> • <u>Watersheds, Water, and Soil Resources (46 pgs.)</u> • Air Quality (NOT YET AVAILABLE)
<p>3. System drivers, including dominant ecological processes, disturbance regimes, and stressors, such as natural succession, wildland fire, invasive species, and climate change; and the ability of terrestrial and aquatic ecosystems on the plan area to adapt to change</p>	<ul style="list-style-type: none"> • <u>Terrestrial Ecosystems: Integrity and System Drivers and Stressors and Maps (142 pgs.)</u> (same as above) • <u>Invasive Plants Risk Assessment and Maps (34 pgs.)</u>
<p>4. Baseline assessment of carbon stocks</p>	<ul style="list-style-type: none"> • <u>Baseline Assessment of Carbon Stocks (10 pgs)</u> <ul style="list-style-type: none"> • Suggest also listing the Terrestrial Ecosystems: Integrity and System Drivers and Stressors (142 pgs.) as important for this topic.
<p>5. Threatened, endangered, proposed and candidate species, and potential species of conservation concern present in the plan area</p>	<ul style="list-style-type: none"> • <u>Wildlife, Fish, and Plants: Identification and assessment of At-Risk Species (NOT YET AVAILABLE)</u>
<p>6. Social, cultural, and economic conditions 7. Benefits people obtain from the NFS planning area (ecosystem services) 8. Multiple uses and their contributions to local, regional, and national economies</p>	<ul style="list-style-type: none"> • <u>Benefits to People: Assessing Multiple-Uses, Ecosystem Services, and the Socio-Economic Environment (37 pages)</u> • <u>Rangeland Management and Maps (26 pages)</u>

	<ul style="list-style-type: none"> • <u>Timber and Vegetation Management (30 pages)</u>
9.Recreation settings, opportunities and access, and scenic character	<ul style="list-style-type: none"> • <u>Recreation (76 pages)</u> • <u>Scenic Character (43 pages)</u>
10.Renewable and nonrenewable energy and mineral resources	<ul style="list-style-type: none"> • Renewable and Nonrenewable Energy Resources, Mineral Resources, and Geologic Hazards and Maps (53 pages) <ul style="list-style-type: none"> • Suggest also listing the Paleontological Assessment (26 pages) as relevant to this planning topic.
11.Infrastructure, such as recreational facilities and transportation and utility corridors	<ul style="list-style-type: none"> • <u>Infrastructure (24 pages)</u>
12.Areas of tribal importance	<ul style="list-style-type: none"> • <u>Areas of Tribal Importance (29 pages)</u>
13.Cultural and historic resources and uses	<ul style="list-style-type: none"> • <u>Cultural and Historic Resources (33 pages)</u> • <u>Paleontological Resources (26 pages)</u>
14.Land status and ownership, use, and access patterns	<ul style="list-style-type: none"> • <u>Land Status and Ownership, Use, and Access Patterns (27 pages)</u>
15.Existing designated areas located in the plan area including wilderness and wild and scenic rivers and potential need and opportunity for additional designated areas	<ul style="list-style-type: none"> • <u>Designated Areas (60 pages)</u>

We also suggest that all maps and figure-maps (such as Figures 1 and 2 in the Areas of Tribal Importance draft assessment), should have county boundaries depicted on them. Including some sort of common reference baselayer (county boundaries, roads, and major rivers) really helps us provide comments relevant to our county and orient us spatially. Some maps, like Maps 1-5, Appendix A of the Terrestrial Ecosystems: Integrity and System Drivers and Stressors draft assessment do have the helpful baselayers displayed for county boundaries and highways. However, some other figures and maps did not in these drafts.

A reference map showing each of the forests and ranger districts (along with county boundaries) would also be helpful in the actual plan document.

COMMENTS BY DRAFT GMUG ASSESSMENT TOPIC AND DOCUMENT:**1. Planning Topic: Terrestrial ecosystems, aquatic ecosystems, and watersheds****a. Specific Comments on Draft Assessment: Terrestrial Ecosystems: Integrity and System Drivers and Stressors and Maps**

In this assessment, the GMUG states that it needs to have changes in the forest plan to provide for ecosystem management that will achieve desired outcomes and be based on the best available science. Goals would be to improve the integrity of key ecosystem characteristics and to maintain ecological integrity. It would do this by:

- Active management of forest to increase the diversity of structural stages, so as to increase, resiliency to fire, insects, disease, and climate change.
- GMUG feels the existing condition is mature, dense stands that are vulnerable to wildfire and insect/disease.
- Promote/encourage continued restoration and resiliency treatments.

The GMUG also states in the assessment that there are some limited data sources or data gaps, including the spatial vegetation dataset FSveg Spatial which at the assessment date had not yet been updated to reflect recent impacts of spruce beetle outbreaks.

- **Comment** – the GMUG planning process should incorporate current conditions, and be timed to use an updated and relevant version of FSveg Spatial.
- **Comment** – The terrestrial ecosystems and forest assessment forming the basis for the revised plan will need to acquire and incorporate insect and disease data – the Nov. 2017 assessment states that no post-beetle outbreak data is available. We believe there is data that needs to be incorporated.
- **Comment** – the GMUG should review and incorporate the data and analysis from the 2017 Upper San Miguel Basin Forest Health Assessment, which was created using data from the USFS and the CFS.
<https://www.sanmiguelcountyco.gov/501/Forest-Health>
- **Comment** – San Miguel County agrees and appreciates that the revised plan should be formed on a new and relevant understanding of seedling recruitment and regeneration from areas recently disturbed by beetle-kill and other diseases, and areas outside of current post-harvest regeneration.
- **Comment** – use of “post-harvest” terminology should be clarified to indicate if monitoring was conducted in salvage, resiliency or green treatments.
- **Comment** – the draft assessment identified and assessed 15 terrestrial ecosystems, comprised of 9 types of forest and woodlands, 3 types of shrublands, and 3 types of grasslands, alpine, and other. Table 1 does not mention wetland, riparian, or fen. Table 2 does seem to lump these in with the “Other” ecosystem classification or type – this should be clarified, as the ecosystems are all shown on Maps 1-5. The terminology should be similar. Riparian, wetland, and aquatic ecosystems are discussed in a separate assessment.
- **Comment** -- Riparian ecosystems, wetlands, fens, and tundra are missing from table 1. Table 1 should add a row, similar to the last row in Table 2, making it clear that other (aquatic, wetland, riparian, and bare) is part of this assessment, or if that is not true, it should definitely be clarified. The note that riparian

ecosystems are discussed in the aquatic and riparian ecosystem assessment should also be added to Table 1. Fens are a special type of wetland/peat bog and should be considered and managed separately from other wetland/aquatic habitats. Tundra and krummholz also should be given its own row in Tables 1 and 2 as an ecosystem either distinct or included in the Alpine upland grassland and forbland. The tundra ecosystem is vulnerable to climate change, where other ecotones can migrate upslope in elevation potentially over time, tundra may disappear.

- **Comment** – Special ecosystems and habitat such as these should be identified, analyzed and managed in the Plan at a different scale than the forest/shrubland/grassland ecosystems. It would be helpful to have a definition of “Plan scale” and “local scale” as practiced by the GMUG (pdf pg 11). Tundra should also be added to Figures 1, 2 and similar figures, with stressors and influencers of the tundra ecosystem fully analyzed. Fens should be broken out of the Alpine-Montane wet meadow/march ecosystem, to receive specific discussion and direction in the plan.
- **Comment** – where the assessment states that there are limitations in the FSVegSpatial and Southwest Regional GAP data, primarily from aerial photo interpretation, it is imperative that other sources such as National Wetland Inventory, FEMA FIRMetts, and fen studies that have been done in the GMUG, specifically in San Miguel County, be included. MSI, CSU, Telluride Institute, SMC, Town of Mountain Village and others have collaborated on special ecosystem studies and monitoring since the 1990s.
- **Comment** – San Miguel County (SMC) appreciates that climate change is considered a significant factor in several draft assessments. This is relevant to the plan, and the new information and changes to the forest since the mid-1980s warrants a plan revision.
- **Comment** – is the Summit Daily newspaper the best reference for pre-1905 grazing within the GMUG area?
- **Comment**-- SMC appreciates that abandoned mines are discussed as potential water contamination, environmental/ecosystem health influencers. Field visits should be done to the 76 shut-in or drilled/abandoned wells on the GMUG and 11 producing wells to ensure no methane leakage, proper closure, gating as required, etc.
- **Comment** – the assessment notes that grazing of cattle, sheep, and horses is lower than historical levels, and notes that rangeland condition has improved over time. We are concerned this is a generalized statement for the amount of land within the forest and 5 districts, and given that the top 5 ecosystems in the best condition still have less than 1/5 to 1/2 of their acreage in “fair” condition. SMC does agree with the concept that adaptive management of timing, intensity, and duration of grazing can mitigate negative impacts and even lead to positive impacts. However, adaptive management will have to incorporate climate change in the real time, as we see snowfall come later in the winter and snowmelt come earlier in the spring, even peaking before growing season starts. Adaptive management should be done at more site-specific or local scale than forest-wide.

- **Comment** – recognition of recreation, including illegal/unmanaged and dispersed camping, associated OHV and trail use, especially above treeline in the alpine ecosystems is warranted. The plan should include management strategies such as increased recreational and law enforcement officers, strategic trailheads and sanitation facilities to reduce impacts.
- **Comment** – (pg 17/pdf pg. 23) – Please update the text to reflect that the East/Middle/West Fork of the Cimarron areas are nearer to Ridgway than Ouray, and are in Gunnison County.
- **Comment** – SMC somewhat disagrees with the statement (on pg 17/pdf pg 23) that extraction of mineral resources and oil and gas development does not currently impact large areas of the GMUG. There are thousands of abandoned/inactive historic mines in the GMUG that are not subject to modern reclamation requirements and have no financially responsible parties. Many of these have ongoing negative impacts to soils, plants, and water quality. If the statement is meant to apply to active/post-law/permitted and bonded extraction of mineral resources and oil/gas development that should be clarified.
- **Comment** – we appreciate, if accurate, the GMUG does not have leased “reserves” within sage-grouse populations. Are all leases on “reserves” – known deposits with quantified economic value? Are there any leases on areas that have potential but are not quantified “reserves”? There is a difference between a resource and a reserve.
- **Comment** – somewhat disagree with the statement (pg 18/pdf pg 142) that oil and gas development can impact areas (up to) within ½ mile of a well pad. This seems to be an oversimplification and might be truer with respect to surficial disturbances, but impacts from short-term and long-term increased heavy truck traffic, dust, noise, road-widening, etc. can extend miles from a well pad and post-drilling. Such disturbances should be managed to be avoided within at least 4-miles of Gunnison Sage-grouse leks, depending on the subpopulation. In the San Miguel Basin population, occupied critical habitat is located up to 6.25 miles from a lek, which is documented in the 2005 Rangewide Conservation Plan (<http://cpw.state.co.us/learn/Pages/GunnisonSagegrouseConservationPlan.aspx>)
- **Comment** – Appendix A: Maps 1-5. Would be helpful to have these labeled as “Map 1”, “Map 2” etc. on the maps themselves in a title block. It is difficult to distinguish without more specific labeling/titling Map 3 vs. Map 4. Map 3 and Map 4 can only be distinguished by finding the word “any” or “all” in the small print of their respective legends.
- **Comment** – the ecosystem names should be made consistent between the assessment document and the legend of Maps 1-5. For example, “Aspen” on Map 1 should be “Aspen Forest” to match the assessment description text on pg. 20 (pdf pg 26). “Pinyon-juniper woodland” is used in the legend of Map 1, but it is described on pg 21 (pdf pg 27) as “Pinyon-Juniper.” Having the descriptor “forest,” or “woodland” consistently in both the legend and ecosystem title in the document is clearer and gives a better visual picture to the reader. Terminology should also be consistent with the cross-reference tables later on in the assessment.
- **Comment** – Desert Alluvial Saltshrub ecosystem is described in the text as comprising only 331 acres and does not appear on Map 1. It would be helpful to

know by a description in the text where it intersects the GMUG forest boundary more specifically and its elevation range. The elevation of this community is not provided in the text, however, the sub-ecosystem, winterfat shrub steppe elevation is provided. There could be an asterisk near the legend in Maps 1-5 that reminds the readers that the ecosystem is too small in size to be shown on the map.

- **Comment** – It is hard to visually distinguish between the hot pink of the Alpine upland-grassland-forbland ecosystem and the rocky slopes, screes and cliffs ecosystem which often are located next adjacent to each other – suggest using a more contrasting color for the rocky slopes on the maps. Many printers, especially laser printers will not have outputs that provide distinct resolution of these two important ecosystems.
- **Comment** – not all ecosystems shown on Map 1 are described in the Terrestrial Ecosystems assessment. It would be helpful to have subheadings for the ones not discussed and have it mentioned which assessment they appear in. Subalpine-montane-riparian shrubland and woodland; Alpine-montane wet meadow/marsh; and Cottonwood riparian ecosystems could have a heading that reminds the reader that these are discussed and analyzed in the Aquatic and Riparian Ecosystem assessment.
- **Comment** – The current plan’s ecosystem management direction is, “maintain a healthy and vigorous ecosystem resistant to insects, diseases, and other natural and human causes.” With the impact of climate change and modeling shown where changes might occur by 2060, the change in management direction being considered is, “to maintain ecological integrity as a whole,” by proactively implementing management actions that can improve integrity. For example, managing to maintain the existing diversity of the landscape and a variety of structural stages, including protection and preservation of the old-growth forest. As well as focusing management actions to mitigate the impacts of known ecosystem stressors, and to prevent drivers from becoming stressors. Also, incorporating monitoring frameworks to monitor ecosystems changes at the landscape scale and effectiveness of management actions (see pgs. 60-62, pdf pgs. 66-68). Under the 2012 Planning Rule, the USFS must **monitor** to detect changes on the unit and across the broader landscape, to test assumptions underlying management decisions, and to measure the effectiveness of management activity in achieving desired outcomes. Monitoring for the resiliency of ecosystems is required.
- **Comment** –the assessment proposes to switch to an Ecological Portfolio Approach in the new plan (see Appendix F, pdf pg 113) that would reduce vulnerability and increase adaptation to climate change by employing management strategies that promote resistance, increase resilience, and/or enable response). The portfolio approach would segregate the landscape into a portfolio of zones, where either observation (accept change), restoration (resist change) or facilitation (guide change) would be implemented. San Miguel County government wants to be actively involved in the identification and creation of the portfolio zones and development of management directions for these zones.

- **Comment** – Consider examining and providing the date of peak runoff in the different major hydrologic watersheds of the GMUG (Gunnison, San Miguel, Uncompahgre) over time such as for the timelines shown in Figures 4-8. The discussion of the existing condition of climate change indicators looks specifically at Gunnison County and Cochetopa Creek (Figure 8, pdf pg 121), and this discussion could add information, if available, from the San Miguel and Uncompahgre watersheds in particular, as they are major headwaters rivers within the GMUG.
- **Comment** – Appendix F should incorporate the data and analysis performed for the Upper San Miguel Basin Forest Health Landscape Assessment in 2017: <https://www.sanmiguelcountyco.gov/501/Forest-Health>
- **Comment** – Appreciate the acknowledgement that the warming trend (increased mean annual temperature of 2 degrees F over the past 30 years and 2.5 degrees F over the past 50 years) being experienced in Colorado (pdf pg 118) and that the temperature warming trend of climate change is connected to emissions and future emissions scenarios (pdf pg 130). However, there should be a mention of how many degrees F the mean annual temperature has increased since the onset of the 21st century (January 1, 2001) to correlate with the climate scenarios mentioned in Appendix F.
- **Comment** – Table 48 (pdf pg 131) and discussions of Hot/Dry, Warm/Wet, Increased Variability scenarios. Please clarify if the described scenarios are all examining average annual temperature increases, and if these increases are in addition to the 2.5 degrees F already experienced in the last 50 years (baseline 50 years ago/circa 1965) or the 2 degrees F already experienced in the last 30 years.

From the text descriptions of the scenarios, it says Hot/Dry scenario would be characterized by “average annual temperatures 5 degrees F higher than those experienced in the late 20th Century” (which ended at the end of 2000) (pdf pg. 123). Table 48 could be clarified to include the word “average” and the baseline (beginning of the year 2001). The information being presented could also provide how many degrees F we have warmed in Colorado/GMUG since the beginning of the 21st century (January 1, 2001) since we might deduce from the information in Appendix F we have warmed 2 degrees F since 1987.

The description of the Increased Variability Scenario says that it would be triggered by average annual temperatures 3 degrees F higher “than the recent past” vs. the “late 20th Century”. Since the Hot/Dry scenario is based on “average annual temperatures 5 degrees F higher than those experienced in the late 20th Century” (pdf pg 123) and the Warm/Wet scenario is based on “average annual temperatures 2 degrees F higher than those experienced in the late 20th Century” (pdf pg 125) – it becomes necessary to know what the baseline temperatures of the “recent past” are.

Perhaps we are already experiencing the Warm/Wet Scenario (since we have warmed 2 degrees F since 1987) and thus the Hot/Dry Scenario would start when we warm another 3 degrees from the present? It is not really clear where

the distinction is then between the Increased Variability, and Hot/Dry scenarios are since they are using different baselines, neither of which are defined for the GMUG.

Adding a column to Table 48 of the year and corresponding baseline reference measurement of the temperature/precipitation/freezing elevation/runoff volume/timing of peak runoff/etc. in each row would be helpful, and would provide the basis for the monitoring and adaptive management actions mentioned in this assessment.

b. Specific Comments on Draft Assessment: Aquatic and Riparian Ecosystems

This assessment discusses the ecosystem integrity of “major” aquatic, riparian and wetland ecosystems, and states that most of these ecosystems are dependent on groundwater. It notes that it cross-references with the Watershed, Water and Soil Resources assessment. The aquatic ecosystem consists of streams, springs, lakes, and reservoirs. The riparian and wetland ecosystems, which are gradational between terrestrial and aquatic, are fen; montane-alpine wet meadow and marsh; montane-subalpine riparian shrubland; montane-subalpine riparian woodland; and cottonwood riparian.

- **Comment** – Suggest renaming this assessment to be “Aquatic, Riparian and Wetland Ecosystems,” since the text seems to distinguish (appropriately) between riparian and wetland ecosystems.
- **Comment** – Suggest including in the references the Mountain Studies Institute San Juan Fen Study, which involved CSU and MTU conducting field visits of fens from 2005-2008. Suggest including Telski and Mountain Village wetland and fen study references. Suggest including RiverWatch and local watershed groups’ water quality and macroinvertebrate data as references.
- **Comment** – The “Key Issues” section is thin and mentions that a plan revision could move away from inventory and monitoring of macroinvertebrates to instead focus on fish and amphibians, and capitalize on the ability of fish and amphibians to “serve as surrogate species” for managing aquatic ecosystems. What is the difference between a “surrogate” species and a “key indicator” species?
- **Comment** – The aquatic ecosystem integrity assessment characteristics are listed as (pdf pg 7): distribution of fish species, distribution of aquatic invertebrates, stream habitat physical characteristics, fragmentation of stream habitat caused by human uses, distribution of native amphibians, and distribution of invasive fungi (which should probably be labeled as #6 in the text). It seems that invertebrate monitoring and inventory is an important metric? Fragmentation of habitat seems only to consider (pdf pg 12) dams and road crossings. We suggest it also include in-stream disturbances such as mechanized placer mining which disturbs or removes macroinvertebrates. Monitoring the return of invertebrates and fish after mining is of importance to San Miguel County to better understand the extent of impacts. Recreational and guided fishing is important to the County.

- **Comment** – neither the aquatic (stream, spring, lake, and reservoir) ecosystem or the fen ecosystem are included in Appendix A: Map 1 – “Ecosystems, Geographic Areas, and Context Area for Terrestrial Ecosystem Assessment.” However, the montane-alpine wet meadow and marsh; montane-subalpine riparian shrubland; montane-subalpine riparian woodland; and cottonwood riparian ecosystems are included in Map 1. There are no maps accompanying this aquatic and riparian assessment. Such a map or maps, depending on the scale needed, showing aquatic, riparian and wetland ecosystems should be included.
- **Comment** – the posters for stream and riparian ecosystem conditions and cutthroat trout contain more specific information on the aquatic, riparian and wetland ecosystems than the assessment. The stream and riparian ecosystem conditions poster contains a map figure. All of the poster information and any maps/figures that have been generated for the poster or assessment should be included in the assessment. The posters are clearer in the needs for plan revision than the assessment text, which seems to emphasize wanting to change invertebrate monitoring and riparian classification methods.
- **Comment** – For example, the poster mentions that there are approximately 390 fens in the GMUG. The assessment text should provide this information, and the number of acres they comprise. Fens are important for carbon sequestration in addition to being valuable and rare ecosystems that tend to discharge groundwater. Fens should be monitored for climate change impacts and receive special management consideration in the plan for protection, preservation, and restoration.
- **Comment** – It would be helpful to have a map or figure to illustrate what a HUC 6th order is, as not all readers are familiar with the Hydrologic Unit Codes, and how they relate to basins, sub-watersheds, watersheds, etc. An alternative would be to put the Watersheds, Water and Soil Resources ahead of this one, as it does have some explanations.
- **Comment** – It would be very helpful to have a map to illustrate the percentages described in Table 4 (pdf pg. 19).
- **Comment** – The Rondeau et al. climate scenarios here (pdf pg 22) are described differently in the Terrestrial Ecosystems assessment. Here they are described as Hot/Dry, Hot, or Warm/Wet. In the Terrestrial Ecosystems assessment, they were described as Hot/Dry, Warm/Wet or Increased Variability. On the poster, it has another name being used. It also would be helpful to pick either metric or English units for this assessment. It switches between degrees F and degrees C, which is probably due to the references being cited, but perhaps the authors could convert one to the other?
- **Comment** – what is AIB (global climate change model)? (pdf pg 23)
- **Comment** – It would be helpful to have maps to accompany the discussion of drivers and stressors, and management influencers, for example, where are the 63 sub-watersheds with AML sites and the four sub-watersheds with “all state-listed impaired waters”? (pdf pg 28)
- **Comment** – With respect to the discussion on dispersed recreation impacting riparian areas, outdoor recreation such as boating and fishing is very important to San Miguel County’s residents and visitors. Management strategies should be

employed, and resources procured by the USFS to allow for opportunities and lessen negative ecosystem impacts.

- **Comment** – Abandoned mine lands that are having documented negative impacts to riparian or wetland vegetation and water quality should be prioritized for clean-up.
- **Comment** – overall, it seems this assessment document could incorporate more of the potential need for change content from the cutthroat trout and Stream and Riparian Ecosystems posters. This assessment seems to emphasize wanting to change the monitoring or classification methodology from invertebrates and the “R2 riparian ecosystem rating system”. Given the climate change scenarios, there seems to be an even greater need than ever to monitor and mitigate the threats to riparian, wetland and aquatic ecosystems. Any new monitoring and classification methods should be utilized by other state datasets and partners, so as to be able to crosswalk historic data and augment USFS data with data from other federal, state and local partners.
- **Comment** – addition of amphibian monitoring as detection mechanisms for ecosystem change means there should be some historic data to determine annual fluctuations and baselines.
- **Comment** – The San Miguel County Board of County Commissioners has historically been opposed to high-elevation water storage projects. Therefore, we do not agree that the revised forest plan should specifically emphasize high-elevation water development projects over other options (pdf pg 31). Any water storage projects should be carefully analyzed to balance the need for minimizing evaporative loss or leakage, but also the need for preserving important functional ecosystems which may be rare downstream.

2. Planning Topic: Air, soil, and water resources and quality

a. Specific Comments on Draft Assessment: Watersheds, Water, and Soil Resources

- **Comment** – This assessment mentions the scale of spatial data is difficult. For management, it may be necessary to drill into the local scale vs. the landscape scale to capture important water, wetland and soil resources.
- **Comment** – appreciate the inclusion of soil carbon effects in the information gap discussion. Carbon sequestration is an important functional value of healthy soils and wetlands, like fens. This should be mentioned in the Key Issues section (pdf pg 5).
- **Comment** – Maps of average annual precipitation levels (inches of rain and inches of snow) across the GMUG would be helpful.
- **Comment** – Maps of where the watersheds rated good/fair/poor for the different attributes would be helpful.
- **Comment** – Agree with the discussion of changes in temperature and precipitation timing.
- **Comment** – agree that water from the headwaters areas on the GMUG is valuable for drinking water and agriculture; but additional prominent values include recreation (boating and fishing); support of functional native terrestrial, aquatic, wetland and riparian ecosystems (pdf pg 14). These should be added.

- **Comment** – the connection between streamflow and groundwater documented in the assessment (pdf pg 15 and elsewhere) is compelling. The Waters of the U.S. (WOTUS) definition and rulemaking stresses surface connectivity and not groundwater connectivity. Thus wetlands considered to be “isolated” and not needing WOTUS protection are connected by groundwater systems. The groundwater-fed water resources are more vulnerable to degradation or loss from human activities than perennial streams that are clear tributaries to traditional Waters of the U.S. The assessment should mention that certain groundwater-fed water resources may be more vulnerable due to lack of regulatory protection in the future, depending on federal regulations and the definition of WOTUS.
 - **Comment** – Colorado’s Regulation 93 impaired waters listing is undergoing a rulemaking hearing on 12/12/2017. The updated listings should be incorporated into this assessment in Table 9, which has an undated list of impaired streams (pdf pg 20) that doesn’t include segments that are tributaries to the San Miguel River.
 - **Comment** – We think the GMUG is in error by stating that there are no surface water-dependent providers on the GMUG within the San Miguel River watershed and San Miguel County, including Ophir. Please confirm. Also, the Town of Ophir is near completion (2017) with its source water protection plan, which should be recognized in this assessment and the revised forest plan. It is our knowledge that the Towns of Telluride and Mountain Village both have surface water sources for their domestic water systems. Ophir uses a combination of springs and streams.
 - **Comment** – The revised plan should contemplate adding the directive of maximizing carbon sequestration in soil (pdf pg 26), in addition to the directions within the current plan.
3. Planning Topic: System drivers, including dominant ecological processes, disturbance regimes, and stressors, such as natural succession, wildland fire, invasive species, and climate change; and the ability of terrestrial and aquatic ecosystems on the plan area to adapt to change.
- a. Specific Comments on Draft Assessment: Invasive Plants Risk Assessment and Maps**
- The assessment states that the majority of invasive species within the GMUG are within 2000 feet of a human disturbance area, such as a road or trail. Inventories occur where there will be a new disturbance. Grazing impacts have been decreasing the number of livestock since 1905. The assessment notes that the lower elevation and higher road density areas of the forest, like the Uncompahgre Plateau, have the highest vulnerability to invasive species. Locally, the greatest invasive species richness and abundance is found in disturbed areas such as riparian corridors, transportation corridors, and locations of fuel treatments.
- **Comment** – Controlling and preventing the spread of invasive species, especially those that are flammable and/or typically result in additional invasive species post-fire is extremely important. However, the USFS GMUG does not have enough resources for this priority.

- **Comment** – Since only a relatively small amount of GMUG acreage has been inventoried; it is suggested that the inventoried acreage be highlighted, so that it is apparent what percentage of the inventoried area is identified as infested (Table 1, pdf pg 10). Otherwise, a reader might think this table was the total infested acres vs. just what was identified through limited inventory.
- **Comment** – USFS GMUG should look for partnerships to increase invasive weed mapping and treatment resources. A comprehensive plan (that emphasizes best practices with limited resources) is essential.

4. Planning Topic: Baseline assessment of carbon stocks

a. Specific Comments on Draft Assessment: Baseline assessment of carbon stocks

The 2012 Planning Rule requires the carbon assessment, but the Responsible Official determines the scope and scale of the assessments. The carbon baseline attempts to use available information to determine carbon sequestered in “forest-based carbon pools” on public lands managed by the USFS in the GMUG only from the Forest Inventory and Analysis National Program.

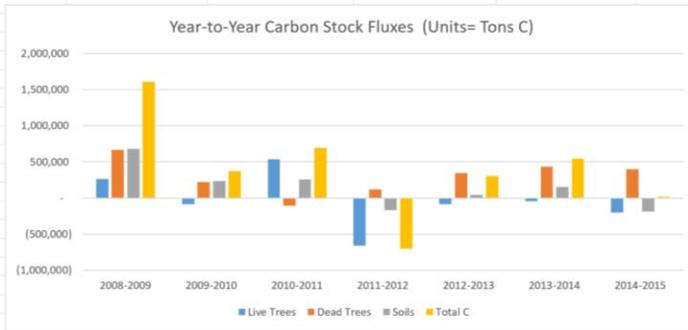
- **Comment** – The assessment does not address geologically sourced carbon that would be present in coal or other energy minerals (or lost during mining/transportation). This should be included and guide management directions.
- **Comment** – Quantifiable carbon in harvested wood products is also not included in the assessment – but the authors say they included a qualitative discussion of the carbon cycle and wood products. They say their key information comes from the Terrestrial Ecosystems: Integrity and System Drivers and Stressors Assessment document. Carbon in harvested wood products should be included.
- **Comment** – On pdf page 6 of 10, 1st paragraph of Chapter 3 of this assessment, suggest rewording to make this first paragraph clearer that the GMUG contains the most sequestered terrestrial forest carbon of any National Forest in the Rocky Mountain Region, as expected due to it being the largest national forest in the region.
- **Comment** – Table 1 (pdf pg. 7) needs very explicit units from these Forest Inventory and Analysis (FIA) runs. Are these tons of Carbon (C) or CO₂ equivalents?
- **Comment** – Was this data based on independent FIA runs? The fluxes are pretty big on an annual basis. The USFS carbon fluxes from year to year seem a bit extreme, carbon moves slowly into and out of the system. A live tree that dies is still standing carbon in the next year - it doesn't just all go back to the atmosphere instantaneously unless it is burnt. Soil carbon moves even slower. Please see the following table comparing the assessment table to a fluxuation analysis:

Carbon Stocks	Live Trees	Dead Trees	Soils	Total C
2008	57,276,824	4,201,809	35,912,640	97,391,273
2009	57,538,610	4,867,123	36,593,800	98,999,533
2010	57,453,657	5,088,287	36,830,713	99,372,657
2011	57,990,167	4,984,062	37,089,195	100,063,424
2012	57,333,414	5,106,883	36,924,822	99,365,119
2013	57,245,417	5,453,870	36,970,771	99,670,058
2014	57,199,323	5,889,619	37,123,002	100,211,944
2015	57,000,983	6,290,223	36,935,393	100,226,599

Carbon Fluxes	Live Trees	Dead Trees	Soils	Total C
2008-2009	261,786	665,314	681,160	1,608,260
2009-2010	(84,953)	221,164	236,913	373,124
2010-2011	536,510	(104,225)	258,482	690,767
2011-2012	(656,753)	122,821	(164,373)	(698,305)
2012-2013	(87,997)	346,987	45,949	304,939
2013-2014	(46,094)	435,749	152,231	541,886
2014-2015	(198,340)	400,604	(187,609)	14,655

Table 1. Major forest carbon pools on the GMUG National Forests

Year	Live Trees, Above and Below Ground (Tons)	Standing Dead, Above and Below Ground (Tons)	Soil Organic (Tons)
2008	57,276,824	4,201,809	35,912,640
2009	57,538,610	4,867,123	36,593,800
2010	57,453,657	5,088,287	36,830,713
2011	57,990,167	4,984,062	37,089,195
2012	57,333,414	5,106,883	36,924,822
2013	57,245,417	5,453,870	36,970,771
2014	57,199,323	5,889,619	37,123,002
2015	57,000,983	6,290,223	36,935,393



6-8. Planning Topics: Social, cultural, and economic conditions; benefits people obtain from the NFS planning area (ecosystem services); & multiple uses and their contributions to local, regional, and national economies

a. Specific Comments on Draft Assessment: Benefits to People: Multiple Uses, Ecosystem Services, and Socioeconomic Sustainability

The assessment recognizes that some social, cultural, and economic conditions in the area of influence around the GMUG are sensitive to changes in the management of the plan area. Under the 2012 Planning Rule, forest plans will guide management of the USFS lands, so they are ecologically sustainable and contribute to social and economic sustainability.

- **Comment** – This assessment should attempt to incorporate data from the local chambers of commerce/resort associations and from the Regions, such as the Region 10 SEDs report, and the county and region Bottom-up Economic development plans, which contain community statements on economic engines and their goals, objectives and actions to improve economic conditions in the communities/counties adjacent to the GMUG.
- **Comment** – the remoteness of an area can be largely overcome if there is abundant, reliable and affordable broadband. Please mention lack of or inadequate broadband on pdf pg 9, 3rd line. Broadband is again vital to attract and retain a successful creative class (pdf pg 10). The forest plan direction should include direction to allow for environmentally appropriate expansion of broadband infrastructure across GMUG lands.
- **Comment** – There are three state universities in the communities and counties profiled in Chapter 2. Higher education is an important economic sector in Grand Junction/Mesa County; Montrose City/County; and Gunnison City/County. In addition, higher education is important in Garfield County/Glenwood Springs with

Colorado Mountain College. Delta City/County has a vocational school. Higher education should be included as an economic sector, and as a resource for citizen science and resource specialists. Regional hospitals in Montrose, Mesa, and Delta Counties have attracted many medical specialists and have an important health care sector to recognize. The assessment appears to capture outdoor recreation for residents as an elevator of the quality of life and important to retain/attract residents. The assessment captures the importance of outdoor recreational tourism as an economic engine.

- **Comment** – add to the list of items affecting outdoor recreation – scenic beauty (pdf pg 26).
- **Comment** – add “carbon sequestration” to the list of key ecosystem services
- **Comment** – suggest adding the percentage of each county in Table 11 (pdf pg 33) that is federal public land and that is GMUG NF land, for perspective on how important the PILT and forest payments or SRS are to local communities. While not on par with revenues from taxable private lands, these payments are essential for socioeconomic sustainability and resiliency.
- **Comment** – retirees are not necessarily the economic driver – it is their desire for luxury housing, furnishings, and private land. Retirees do not consume as much as families with children.
- **Comment** – the majority of the communities/counties are greatly challenged with trying to have affordable housing for workers. The unaffordability of housing is related to a relative scarcity of suitable private land, the affluence of the retirees and non-resident speculators and part-time residents. There will be pressure on the GMUG and federal land agencies to assist in transferring land for public benefit projects like affordable housing. Situations and locations of lands that could be swapped or transferred for the public benefit of affordable housing projects in WUI areas should be contemplated in the assessment and the revised forest plan.

b. **Specific Comments on Draft Assessment: Rangeland Management and Maps**

The assessment shows that there are roughly 2.5 million grazing acres on the GMUG, with 199,206 acres within 33 total and 20 active allotments in the Norwood Ranger District. One of these allotments is used for sheep grazing. Fifty-seven percent of the rangeland vegetation condition in the San Juans is described as “Good,” and less than one percent is rated as “poor.” Eighty-six percent is considered “stable,” and only 5 percent of the range in the San Juans is considered to be trending “downward.” Efforts to control grazing began in 1905. However, grazing is described as “heavy” and being a major disturbance factor from 1874 through the 1940s. Allotment sizes have increased over time to allow for rotational grazing and adaptive management.

The assessment notes that there are conflicts between domestic sheep and native bighorn sheep, competition between elk and livestock for forage, and impacts to rangeland condition from recreation.

The assessment also notes that some grazing can have adverse ecological impacts while “conservative grazing” can provide positive outcomes.

The current plan direction is to provide livestock forage commensurate with the needs of the resources and in harmony with the plan direction. It does not provide guidelines for existing and

desired vegetative conditions on specific allotments and does not incorporate adaptive management.

- **Comment** – We generally agree with the assessment and poster’s rationale that the revised plan should incorporate the following components: identification of rest periods following disturbances like fire, drought, seeding, etc.; using stubble height standards to measure forage utilization; managing for a range of seral stages; providing standards to improve or maintain rangeland; and emphasizing adaptive management strategies.
- **Comment** – providing standards to improve or maintain rangeland health should be targeted to improve/maintain rangeland for livestock and wildlife, including big game.
- **Comment** – grazing allotments should be allowed to remain open and if necessary to be reconfigured, if they provide measurable ecosystem services.
- **Comment** – Integrated Pest Management that includes herbicide treatments must be conducted very carefully to not harm pollinators, wildlife, or water resources.
- **Comment** – This assessment’s map shows that a number of allotment lands have been closed in the alpine/subalpine areas around Telluride in San Miguel County. We support the closure of grazing allotments in these areas.
- **Comment** – We appreciate the inclusion of management direction that would require range improvements to also improve outcomes for wildlife or water resources, and reduce recreation conflicts.
- **Comment** – With climate change impacts likely to be variable and frequency of drought or hot years to increase, adaptive management strategies are necessary for the revised plan, and should also take in to account the needs of big game and wildlife during stressed conditions.
- **Comment** – Allotments that remain vacant should be considered for closure where there is interest for outdoor recreational use from local groups.

c. Specific Comments on Draft Assessment: Timber and Vegetation Management

- **Comment** – The majority of the planned timber harvest volume will be conducted through the GMUG Spruce Beetle Epidemic and Aspen Decline Management Response (SBEADMR). This project is in response to the significant outbreaks of disease and insect infestation within the forest.
- **Comment** – The revised plan should emphasize forest health treatments that prioritize safety in WUI and recreational trail areas and designed to improve ecosystem functions and not degrade visual resources, which are important to our economy.
- **Comment** – The revised plan should incorporate the adaptive management plan being implemented for SBEADMR and allow for local direction from collaborative partnerships such as the Upper San Miguel Basin Forest Health Landscape Assessment. GMUG and the Norwood Ranger District staff have been active stakeholders.
- **Comment** – The revised plan should minimize creating new roads, which fragment habitat and provide vectors for invasive species.
- **Comment** – Timber sales should be co-developed with the local governments, so as to mitigate impacts to other sectors of our economy, residents, and to incorporate local permitting requirements and measures desired to mitigate off-forest dust, noise, traffic, runoff, and impacts to non-forest roads.
- **Comment** – Pre- and post-project monitoring should be incorporated into all timber management activities as outlined in SBEADMR.

- **Comment** – Projects should balance benefits to site-specific forest resiliency and species migration projected by climate change models.

9. Planning Topics: Recreation settings, opportunities and access, and scenic character

a. Specific Comments on Draft Assessment: Recreation

- **Comment** – Outdoor recreation is extremely important to the economy and quality of life in San Miguel County. We appreciate the identification of local recreation plans as an information gap for the revised plan. We encourage GMUG to compile such plans, meet with local governments, Telluride Ski Resort, and local/regional trails groups to understand specific desires for recreational amenities and impact mitigation ideas. Winter and non-winter recreation are equally important in San Miguel County.
- **Comment** – We agree with local trails groups and the assessment in that there are current challenges in our forest with respect to trail overuse or overcrowding, inadequate trail design resulting in resource damage or ecosystem degradation, poor or lacking trail signage, unauthorized user-created trails, motorized vs. non-motorized conflicts, and lack of adequate sanitation. Local trails groups are a valuable resource for knowledge, volunteers, and outreach. We encourage the GMUG to continue meeting with local trails groups to establish partnership opportunities that would result in enhanced, environmentally sensitive trail systems.
- **Comment** – We support the addition of strategically located message boards or kiosks to provide tread lightly and trail information, including the common preference of direction of travel, to reduce conflicts and resource damage. However, in keeping with the long-standing values of the Telluride region, we ask that signs are kept to a minimum.
- **Comment** – User-created trails tend to indicate a local desire for additional trails, but depending on the location and construction can have some impacts on soil, watershed and ecosystem health. We encourage the GMUG to work with local trail groups to plan trail systems that are sensitively located and designed to provide recreational benefits without impairing slope stability, highly functional ecosystems, water quality, or sensitive wildlife habitat. Trails that are proximal to existing infrastructure such as trailheads, roads, or sanitation should be prioritized for review.
- **Comment** – Plan revision should take into account changes in current and yet-to-be-invented winter and summer recreational patterns, and changes in motorized and non-motorized travel. For example, side-by-side UHVs and snow-biking were not contemplated in the current plan. Drones are a new technology that is now used for recreation on the forest.
- **Comment** – We agree that increased trailhead parking and sanitation is needed in some areas of the GMUG within San Miguel County. Signage and camping are additional service needs. There is a great lack of camping options in the San Miguel County portion of the GMUG while it is becoming an increasingly popular summer recreation destination
- **Comment** – Organized trail races are important to local participants and support services. We encourage the GMUG to anticipate demand for trail races and

permits and to strictly enforce leave no trace ethics with each permit. For example, the trail markers should be similar to those the Hard Rock 100 footrace uses, discrete and limited to the intersection. Markers should be removed immediately after the event or race. Trail usage that overlaps with County roads or trails should be communicated to the County early in the event permitting process.

- **Comment** – The assessment might mention that popular recreation activities in the Telluride area include hiking, rock climbing, winter sports, mountain biking, etc.
- **Comment** – It would be useful to know which sites in San Miguel County have been proposed by USFS to become a concession or volunteer/partner operated site (pdf pg. 42).
- **Comment** – It is clear that the USFS needs more financial resources to deal with the decades-long deferred maintenance of existing campgrounds and trails, and to monitor dispersed recreation and associated impacts. Norwood Ranger District created a “Recreational Ranger” program in 2016, jointly funded by local governments in San Miguel County, to have the resources for recreational staff to educate trail users about the forest, improve and maintain trailheads, kiosks, and sanitation facilities, and to mitigate impacts from dispersed recreation. San Miguel County provided \$25,000 toward this program in 2016. All local contributions should be leveraged to obtain additional short-term and long-term funding such as from grants or conservation corps hours to perform deferred maintenance and mitigate recreation impacts.
- **Comment** – San Miguel County has partnered with adjacent counties, USFS, and BLM to fund an “Alpine Ranger” program, to augment the lack of patrols on extremely popular OHV/UHV/4-WD alpine roads. The counties worked to initiate this program in response to safety concerns from inexperienced and non-licensed OHV operators and drivers of motor vehicles, speeding, and resource damage along the greater “Alpine Loop” which includes Black Bear and Imogene Passes. This program was also created in response to the number of serious accidents, some involving unlicensed youth. San Miguel County, similar to Hinsdale, San Juan, and Ouray Counties requires OHV operators to have valid driver’s licenses, and that liability insurance is in effect. It is clear that USFS needs additional Law Enforcement Officers assigned to the GMUG. San Miguel County provided \$4,400 toward this program in 2016 and is supporting a grant application to bring in additional funds in 2017. Local contributions should be leveraged to obtain additional short-term and long-term funding such as from grants or conservation corps hours to perform deferred maintenance and mitigate recreation impacts.
- **Comment** – The assessment and poster identify increasing fiscal capacity by working with more partners and volunteers as a need for a plan revision. We agree with this approach, but GMUG should recognize San Miguel County is limited in our ability to raise funds and by being required to perform our state and federal mandates. Payment-in-lieu-of-taxes (PILT) is an important funding source for the county and currently does not have a long-term guarantee of being fully appropriated by Congress.

- **Comment** – Agree with the need to research certain topics relating to climate change and outdoor recreation (pdf pg. 55). We encourage research assessing the water needs for recreation and aquatic/riparian/wetland ecosystems health as well.
- **Comment** – We appreciate the identification of county plans, resolutions, and other information regarding recreation as a data gap in this assessment. San Miguel County would be pleased to assist the GMUG in obtaining relevant local plans and resolutions that would inform and be incorporated into the revised plan.
- **Comment** – We agree that the plan revision needs to examine additional recreational demands. Preservation of our visual resources or scenic integrity is important, as San Miguel County’s scenic vistas are iconic and are important for residents and tourism.

b. Specific Comments on Draft Assessment: Scenic Character

The assessment notes that the current visual resources management system is outdated and inadequate and is not based on the best available scientific system.

- **Comment** – We agree that scenery is an important resource and is vital to the enjoyment and economic value of recreational uses in the GMUG. We also agree the public may form a personal opinion on the state of a forest’s health by the view they see as a passerby, Therefore, aesthetics and the quality of the scenery is important to the public’s perception and experience either viewing or using the GMUG lands.
- **Comment** – During the 2017 stakeholder driven Upper San Miguel Basin Forest Health Landscape Assessment, the scenic value of our healthy forests emerged as the top community value.
- **Comment** – The assessment says the scenery management system inventories were completed in 2005 and updated in 2016-2017. With the changes in the forest due to insect and disease activity, the updates seem important.
- **Comment** – San Miguel County has local master and land use plans and an escarpment easement of relevance for this assessment, which could help fill the information gap mentioned (pdf pg. 7).
- **Comment** – Wilson Peak is an iconic peak over 14,000 feet in elevation. Scenic resource management to retain its integrity and prominence as viewed from Highway 145, designated Scenic Byways, public roads and trails, wilderness areas, and GMUG lands is important.
- **Comment** – The revised plan should give management direction for scenic quality impact mitigation where there are important scenic resources that have been degraded by insect and disease in forested areas. Local governments should be consulted to help identify areas where degraded scenic resources are having a negative impact on the local economy.
- **Comment** – To balance the need for recreational amenities such as campgrounds, bathrooms, kiosks, and other infrastructure, the GMUG should include management direction to require the use of design tools such as designing to minimize the appearance of mass, scale, contrasting colors (by blending with the shadows), glare and unnatural edges where disturbances and

improvements are to be located so that man-made features do not compete with the viewer's attention when viewing the GMUG landscape.

10. Planning Topics: Renewable and nonrenewable energy and mineral resources

a. Specific Comments on Draft Assessment: Renewable and Nonrenewable Energy Resources, Mineral Resources, and Geologic Hazards and Maps

- **Comment** – The key issue for “Treatment and prioritization of abandoned mine lands and lands with previous or active mining activity” as provided (pdf pg. 6) is unclear as to its meaning. Does it mean prioritization for cleanup or treatment? Or is it prioritized for new mining activities after treatment? Abandoned mine land inventories should be reviewed and mines that present hazards for humans or the environment should be prioritized for cleanup, with emphasis on those mines with drainage that is stressing or killing vegetation, negatively impacting ecosystems, and water quality; and those mines that are near enough and visible enough to popular roads and trails to create a human nuisance.
- **Comment** – The key issue for “Effects of mineral development and energy production” should also include a recognition of the on-forest and off-forest/off-site effects of the activity on ecosystem services, human health, wildlife and plant habitats, water quality and quantity, climate change and greenhouse gas emissions, air quality, invasive species, stormwater runoff, noise, traffic, impacts to non-forest rights-of-way, and more.
- **Comment** – Another key issue is to consider withdrawal of mineral entry (mining and leasing withdrawal) in roadless areas having low to moderate mineral resource potential, as the emphasis for the forest should be to allow mining where there is a high enough mineral potential to balance the disturbances to the forest, especially in high quality and functioning roadless areas. Mining in roadless areas should be highly restricted, such as with non-waivable hardwired No Surface Occupancy (NSO) stipulations.
- **Comment** – The best available science section does not list referencing any of the U.S. Geological Survey's reports or geospatial data nor the Colorado Geological Survey's reports or geospatial data that covers or is relevant to the GMUG. The BLM is also now putting information on mining claims and leases in its Navigator.blm.gov website for geospatial data.
- **Comment** – Please define “upper tier” and “non-upper tier” acres (pdf pg. 13).
- **Comment** – San Miguel County understands that the GMUG plan would have to be compliant with the Colorado Roadless Rule (CRR), and supports a plan direction that new leases in the upper tier would only be available 2 miles from an area allowing surface occupancy, with an extension to 3 miles if the lessee is certain they can access the minerals without surface occupancy. Technology may shift in the future, and the plan can be amended when new technology allows for no surface occupancy at greater distances from the pad than present technology. The plan shouldn't anticipate technology that doesn't yet exist. The plan should emphasize keeping the roadless area free from roads.
- **Comment** – San Miguel County supports withdrawals (mining and leasing withdrawal) from mineral entry to protect special cultural or historic features, fens, or prevent extreme conflicts when the conflict would negatively impact the local or

- regional economy (such as closing a trail system, campground, ski area, etc. to allow for mining activity). The plan should withdraw from mineral entry (mining withdrawal) the lands under resources like the Matterhorn Mill, Ames hydroelectric plant and penstock facilities, and other historic or cultural features where surficial disturbance or vibrations could destroy these irreplaceable resources.
- **Comment** – We are concerned about the hundreds or thousands of locatable mining claims, mostly placer claims, that have been claimed in the last several years on the federal mineral estate within the GMUG and BLM lands. The public is understandably nervous about the intent of these claims, and the degree of oversight between the claims on BLM land (which does not automatically require a Plan of Operation) vs. USFS land (which we understand absolutely requires a Plan of Operation) is different across jurisdictions. Even small-scale placer mining using a mechanized dredge has the ability to negatively and significantly impact our economy when it is located in the only boatable portion of a river channel that is also used by outfitters and recreating public. These claims, even those with no true intent to mine, create a valid existing right that interferes with other activities. We understand that these claims are processed according to the 1872 Mining Law. However, the USFS should be proactive in determining if these claims are accurately described and meet all requirements, and if not, should work with the BLM to invalidate them.
 - **Comment** – We appreciate the prioritization of clean-up of the Carribeau Mine and Mill Site, the Matterhorn Mill Tailings Site, the New Dominion Mine Site and the Telluride Valley Floor Tailings Site. Improving water quality and mitigating impaired waters in San Miguel County is a long-standing goal of the County, which is active with the San Miguel Watershed Coalition. We are also interested in remediation of the San Bernardo Mine site, which has a draining mine opening on private land on slopes and terraces proximal to the Lake Fork of the San Miguel River. Associated tailings, waste rock, and kill zones appear to be on a mix of private on USFS land, but this should be confirmed. If there are mine features needing remediation that would involve USFS land, we request that this is identified and prioritized in the plan.
 - **Comment** – GMUG should ensure that the planning document relies on the latest Colorado Regulation 93 designations of impaired and monitoring/evaluation listed stream segments, which is being updated in late 2017. The date of the 303d list providing the segments shown in Table 4 (pdf pg. 27) is not provided.
 - **Comment** – Geologic hazards list in Table 5 (pdf pg. 29) should include ice jams and floes, and earthquakes.
 - **Comment** – The statement that recorded seismic activity in the vicinity of the GMUG is tied to underground coal mining or related to injection wells on private land is not fully correct. Several faults are rated for a quaternary movement that could be sources of earthquakes felt on the GMUG (<http://dnrwebmapgdev.state.co.us/CGSOnline/>). More recent USGS and CGS data than 2008 should also be incorporated into the assessment.
 - **Comment** – Avalanches are a significant geologic hazard, and while they are mentioned in Table 4, the mapped acres seems low. Have the Colorado Avalanche Information Center and active mining operations around the GMUG been consulted? Outfitters such as Helitrax may have updated information on avalanches they monitor for their operations. This geologic hazard is important to inventory and

assess, as avalanches have significant economic impacts when transportation and telecommunications infrastructure is interrupted, the off-forest property is damaged, and loss of life or injuries are incurred. It is important to understand spatially with respect to winter recreation and trails. The county and partners provide emergency management, search and rescue and first response for incidents.

- **Comment** – USFS should require that the best available technologies be employed to retard methane and greenhouse gas emissions from coal, and oil and gas drilling, production and transportation.
- **Comment** – The assessment indicates that there are multiple electronic databases to consult to determine the current status of minerals open to entry, closed to mining or closed to leasing. Synthesizing and updating this information would be helpful to reduce human errors and management challenges, and would be useful for the public and the county.
- **Comment** – Elsewhere in our comments on the individual assessments we have recommended that the USFS pursue mineral withdrawal from Congress and/or the Secretary of the Interior in certain situations.
- **Comment** – San Miguel County Board of County Commissioners passed resolutions in support of the San Juan Wilderness Act which has been introduced in multiple sessions of Congress. If it is reintroduced, the San Miguel County Board of County Commissioners should be consulted to affirm support of any boundary modifications.
- **Comment** – We support the acknowledgment of a wider variety of terrain and habitat in future Wilderness areas.
- **Comment** – In the “Issues in the Broader Landscape” section, it should be recognized that the Uncompahgre Field Office is in the process of amending its Resource Management Plan (RMP). In addition, it should be recognized that the Colorado State BLM office is in the process of considering amendments to several RMPs, including the Uncompahgre and Gunnison Field Office RMPs with respect to activities that affect Gunnison Sage-grouse populations or habitat following the 2014 listing of the Gunnison Sage-grouse as a threatened species and designation of critical habitat. These amendments could affect management decisions for federal mineral estate and lands adjacent to the GMUG that would provide access to GMUG minerals.
- **Comment** – The forest plan revision should incorporate measures as strong or stronger than BLM plans to protect, conserve, and enhance Gunnison Sage-grouse populations and habitat.
- **Comment** – San Miguel County is very concerned about air quality impacts from uranium and oil and gas resource extraction, including but not limited to methane emissions. We have partnered with other local governments and Mountain Studies Institute to conduct air quality monitoring and conduct a radionuclide baseline study. We believe this data is relevant to the GMUG plan revision and should be reviewed. We appreciate the acknowledgment in this assessment that regional air quality can be impacted by activities outside of our own jurisdictional boundaries. Air quality is important for public health and reducing human diseases, and important for our local economy which depends on an average or better snowpack and cold temperatures to prevent winter rain and early runoff.

- **Comment** – Dust on snow is another concern for San Miguel County, as dust reduces air quality and affects snowpack retention and runoff times. Due to our winter recreation economy and headwaters areas on the forest, dust on snow can have significant economic impacts for GMUG communities. This is another geohazard, that is exacerbated by human activities that can be hundreds or thousands of miles away. Conditions and risk scenarios on the GMUG and on federal public lands to the west should be mindful of dust potential and mitigate dust. Dust on snow can accelerate the predicted climate change effects of the hotter/drier scenario and have negative impacts on water quality and quantity.
- **Comment** – This assessment should consider including maps of mineral resource potential (locatable, salable, and leasable), renewable energy resource potential (wind, solar, geothermal, biomass, and hydro) and areas closed to mining or leasing. We appreciate the maps showing active leases and claims that were included.
- **Comment** – This assessment does not include analysis of other geologic resources such as fossils and paleontological resources or special rock formations that may be source materials for special soils. There is a separate paleontological resources assessment that was provided. Consider if renewable energy should be discussed in a separate assessment while geology, geologic hazards, and mineral and mining potential and resources should be more comprehensively discussed in this assessment.

11. Planning Topics: Infrastructure, such as recreational facilities and transportation and utility corridors

a. Specific Comments on Draft Assessment: Infrastructure

- **Comment** – We generally agree with the key issues, but recommend splitting out the deferred maintenance for facilities such as campgrounds, kiosks, bathrooms, etc. and deferred maintenance for roads and trails (rights-of-way or routes). Also, we are unsure that fiber optic lines should be described as a “special use” unless telephone, power, and water utility transmission infrastructure is also a “special use.” Due to unforeseen changes in technology, perhaps, “fiber optic lines” is too specific – the key issue is to provide management direction that guides allowing broadband infrastructure to cross the GMUG. Today it might be copper and hopefully fiber, but perhaps in the next decade, broadband infrastructure uses a different conveyance material. In the meantime, broadband infrastructure that should be contemplated also includes communications towers to spray broadband wirelessly to the end user. These towers may require fiber to the tower and power either generated onsite or through the grid. Broadband or data access is increasingly desired by campers at campgrounds.
- **Comment** – Different assessment documents have referred to high-elevation water projects, water projects, or water storage facilities. We suggest trying to be consistent in the assessments so the revised plan can be consistent with directing management and activities.
- **Comment** – In regard to public comment received that four-wheel drive vehicles are damaging roads and creating more maintenance needs, it is our experience and public opinion that the explosion of OHVs and UTVs using traditional “jeep” roads has led to different and more extreme wear on these roads. The lighter vehicles tend to try to travel much faster, creating the need for speed limits, where 4-wheel drive motor vehicles like jeeps, FJs, and SUVs were self-moderating from their weight, gearing,

suspension vibrations, and turning radii. The lighter and faster OHVs and UHVs tend to try to “burn” through the terrain and spin the fines out of the roadbed, leaving a more cobbly and bouldery roadbed, that is tougher to navigate with stock jeeps and 4-wheel drives. The need to crush rock and replace fines in these alpine road beds has increased greatly since the 1990s/early 2000s. San Miguel County has Schedule A agreements with the USFS, but the deferred maintenance and newer wear patterns now lead to a greater cost and need for “reconstruction” in the scope of repairs.

- **Comment** – The assessment and revised forest plan should carefully differentiate between OHVs and UHVs, which in Colorado are not classified as motor vehicles for the purpose of operator credentials, accidents, and liability; and 4-wheel drive motor vehicles, which include jeeps, FJs, and SUVs, and which the state’s motor vehicle laws apply to. The speeds and wear patterns on roads and trails are much different for these vehicles.
- **Comment** – The state “HUTF” road segment list of maintained county roads should be included in the data references. Accepted best practices for maintenance of dirt, rock, and native soft soil roads should be included as a best available science reference, unless the USFS has a specific manual.
- **Comment** – The forest service should require the timber contractors or mineral companies to construct/reconstruct/decommission timber or mineral roads. It appears from the assessment text (pdf pg. 9) that there is an imbalance of USFS resources on roads. There should be a balance of effort and resources of USFS personnel on roads specific to timber or a mining operation and recreation or primary forest access routes used by thousands of the traveling public weekly.
- **Comment** – The revised plan should make suggestions on how to increase or leverage resources to accomplish the \$49 Million in accumulated deferred road maintenance. High use roads in the upper watershed that have the ability to degrade water quality below the headwaters should be considered for prioritization.
- **Comment** – Broadband infrastructure such as fiber optic, should be allowed to be co-located in any designated utility corridor utility where the plan enables expedited environmental review of reconstruction or additional construction under a categorical exclusion where appropriate. We agree the plan should encourage colocation of new lines. The plan should also anticipate where there are aerial or buried copper telephone lines and not yet fiber optic; there is a present need for broadband infrastructure by the communities those serve and enable that as part of the plan.
- **Comment** – With respect to the information gap for municipal and irrigation water supply plans and projected needs (pdf pg. 14), the GMUG should consult with the relevant water conservation districts and water users’ associations and the Colorado Water Conservation Board, which has needs assessments that have been created in part with the relevant basin roundtable groups.
- **Comment** – San Miguel County appreciates the general direction for requiring burial of utility lines of 33kV or less and telephone lines, unless infeasible. Scenic or visual resources and retention of our rural character is extremely important to residents and our economy. The assessment states (pdf pg. 17), “This direction may need to be updated because of changes in technology and standard industry practices.” This direction to underground lines should be retained and strengthened.
- **Comment** – San Miguel County desires that the USFS GMUG examine ways to accomplish preservation of flows within streams to fulfill environmental and recreational

needs while fulfilling other prior needs. Since current laws prohibit USFS to hold instream flow rights as an agency, other mechanisms to achieve the protective outcome need to be explored and inserted into the revised plan.

- **Comment** – San Miguel County would be happy to assist USFS GMUG in filling the county plan information gap with respect to road constructions, upgrades, and maintenance (pdf pg. 18); we can also provide estimates and recommendations for deferred maintenance or reconstruction on Schedule A roads.
- **Comment** – The San Miguel County Board of County Commissioners has historically been opposed to high-elevation water storage projects. Therefore, we do not necessarily agree that the revised forest plan should specifically emphasize high-elevation water development projects over other options (pdf pg. 18). Any water storage projects should be carefully analyzed to balance the need for minimizing evaporative loss or leakage, but also the need for preserving important functional ecosystems which may be rare downstream.
- **Comment** – We are unsure if reservoir expansion is always better for ecosystems and communities than new reservoir construction. Each water storage project should be analyzed independently for environmental impacts and should take into account off-forest impacts.
- **Comment** – We agree in most cases line upgrades are preferred over new line construction, however, if the upgrade results in a previously buried line become an overhead line in a visually important area or an area with wildlife conflicts such as Gunnison Sage-grouse habitat. Upgrades of buried lines should keep the upgraded lines buried.
- **Comment** – We agree USFS should examine the frequency and magnitude of recent floods to design for expected future trends, if different than expected 100-year flood events in existing floodplain delineations.
- **Comment** – Where facilities are needed to manage the resources, but USFS feels they can no longer be maintained, please clarify if they can no longer be maintained because of limited USFS resources or if there are other challenges with the facilities. Prior to decommissioning, the plan should provide direction to look for willing partners or even concessionaires to maintain facilities. The demand for camping and sanitation facilities will continue to increase in the future.
- **Comment** – Please add county boundaries to Map 1 (pdf pg. 21). We appreciate that they are shown on Map 2.

12. Planning Topics: Areas of Tribal Importance

a. Specific Comments on Draft Assessment: Areas of Tribal Importance

The current plan was written and adopted prior to a number of pertinent laws and regulations, suggesting that the enhanced tribal consultation process and new policies, laws, and regulations that should now inform the planning process and final revised plan.

The assessment emphasizes government to government relationships and consultation with three Ute tribes.

- **Comment** – San Miguel County supports the Ute Indian Tribe and has apologized to the Uncompahgre Band of the Ute Nation for forcible removal from their lands on Colorado's Western Slope, which includes lands now within the GMUG NF (Resolutions 2014-11; 2016-026). We feel the final plan needs to incorporate the

desires of people who were indigenous to these lands. The GMUG NF contains lands that have cultural and natural significance such as medicinal plants and other flora, fauna, hunting grounds and sacred lands.

- **Comment** – SMC appreciates GMUG’s acknowledgment that it needs “updated information regarding the identification of traditional use areas and cultural landscapes within the GMUG planning area.” We encourage that GMUG completes a thorough consultation with the three Ute tribes but also other tribes that may have the knowledge or shared ancestry of indigenous peoples that historically or seasonally occupied areas within the GMUG.
- **Comment** – The Tribal Assessment states that as of September 2017, there was no response or availability for joint meetings to requests sent to the tribes via letters and emails. GMUG should work through all possible means to obtain input from tribes, such as enlisting help from the Colorado Commissioner of Indian Affairs and other entities to schedule productive meetings.
- **Comment** – Appreciate the acknowledgment of climate change on tribal cultural/natural resources.
- **Comment** – The increased pressure of recreation/dispersed recreation makes it more important to identify important cultural resource areas so that recreation might stay on designated routes and avoid harming irreplaceable sites/locations.
- **Comment** – Regardless of the plan, if GMUG does not have sufficient Law Enforcement Officers on staff to be capable of protecting tribal resources from vandalism/theft/resource damage then the plan has less relevance.
- **Comment** – We are in general agreement with the suggested items to consider in the revised plan (pdf pgs. 18-19).

13. Planning Topics: Cultural and Historic Resources and Uses

a. Specific Comments on Draft Assessment: Cultural and Historic Resources

San Miguel County has been extremely active through its Open Space and Parks Department and Historical Commission in preserving and restoring historic buildings and designating historical landmarks. Currently, preservation and restoration interests include the Pandora Mill, Matterhorn Mill, and the penstock and other components of the Ames hydroelectric powerplant.

- **Comment** – We appreciate the inclusion of the Matterhorn Mill and Ames hydroelectric plant penstocks in the discussion (pdf pg. 10) of Priority Heritage Assets.
- **Comment** – The revised plan should request Congress or the Secretary of the Interior to withdraw the land under the Matterhorn Mill and Ames hydroelectric plant penstock from mineral entry (mining withdrawal). This may be appropriate for other listed Priority Heritage Assets. Wildfire mitigation measures to reduce the risk of losing these assets to a wildfire should be contemplated.
- **Comment** – It would be helpful to include the County in Table 4’s list of Priority Heritage Assets (pdf pg. 19).
- **Comment** – We are in general agreement with the bullets provided under the potential need for plan change on the Cultural and Historic Resources poster and the assessment document (pdf pgs. 26-27). However, if historic properties are used as rentals, it should be done if there will be no vandalism or damage to the historical integrity of these sites. Allowing visitors to use them will enhance the public’s understanding and respect for our heritage and homesteads.

- **Comment** – The revised plan should encourage increasing the percentage of cultural resources having condition assessments and evaluation for eligibility for listing on the National Historic Register.

b. Specific Comments on Draft Assessment: Paleontological Resources

The assessment states that there is no Comprehensive Evaluation Report for the GMUG paleontological resources. There is one Special Interest Area (Dry Mesa Dinosaur Quarry) on the Uncompahgre Plateau. Otherwise, there is no direction for management of paleontological resources for the GMUG. The GMUG does have such resources including vertebrate trackways, plant and invertebrate fossils, and fossil mammals. There is public and scientific interest in such resources. The USFS employs three “obligate paleontologists” nationally, hindering the ability of the USFS to provide management of paleontological resources, and causing these resources to be treated by the USFS as a stewardship responsibility within cultural services.

- **Comment** – Agree that USFS and GMUG public outreach brochures, displays, kiosks, and websites should be reviewed for consistency with current rules for casual collecting and rock-hounding, as these are popular activities that are getting new attention from television shows and media.
- **Comment** – Consider combining this assessment with geological resources, providing an assessment of the geologic units, settings and geologic history of the GMUG, separate from mineral resources and mining potential.
- **Comment** – Consider referencing maps having a larger scale, that is more locally specific to the GMUG, than the State Geologic Map of Colorado. There are many U.S. Geological Survey maps and publications that are at a 1:100,000 or even larger scale and delineate individual fossiliferous formations vs. formations lumped by geologic period.
- **Comment** – We are not familiar with the PPRAS classification and cannot comment on the values given to different geologic units. However, from the personal experience of a staff member, the Devonian Ouray Limestone, Pennsylvanian Hermosa Group, Pennsylvanian/Permian Cutler Formation, Triassic Chinle, Jurassic Morrison, Cretaceous Mancos Shale, and Tertiary fossiliferous limestones of the Fort Union, Wasatch and Green River formations contain marine, plant, invertebrate or vertebrate fossils. Please review the assessment as we didn’t see reference the Ouray Limestone as having paleontological resources.
- **Comment** – Due to USFS lack of obligate paleontological resources specialists across the country, we recommend partnering with the Geology Departments of Colorado universities in the region (Western, Mesa, Fort Lewis) and School of Mines and/or Colorado Geological Survey, and U.S. Geological Survey to review the PPRAS information provided here and compile a literature review of known collection sites and geologic potential across the GMUG to help prioritize and guide volunteer stewardship recommended by the GMUG in the assessment. It appears that the USFS is required to manage and protect paleontological resources on Federal land using scientific principles and expertise. Consider new partnerships to procure the resources for a third party qualified paleontological resource field inventory on the GMUG, so these resources are known, assessed, managed and protected.
- **Comment** – Recommend sorting the rows in Table 1 (pdf pg. 21) from youngest to oldest geologic units, and providing a column with the full name of the Geologic Unit that corresponds to the label (abbreviation). Unit names for generally equivalent geologic

units change across the forest, and this would be helpful for someone looking to correlate or find a particular geologic unit or equivalent in the table.

14. Planning Topics: Land status and ownership, use, and access pattern

a. Specific Comments on Draft Assessment: Land Status, Ownership, Use and Access Patterns

- **Comment** – We appreciate that under the current plan wilderness inholding was decreased by 73%. We support continued use of the public/private partnerships that achieved these acquisitions. We appreciate and support the emphasis on reducing inholdings through acquisition in Roadless areas.
- **Comment** – The Red Mountain Project, which used LWCF for the USFS to acquire high elevation patented mining claims from willing sellers has greatly reduced potential conflicts for the forest, public, and counties, and should be pursued in the future. Some remaining claims are receiving development pressure to allow for lodges, plowed roads, utilities and infrastructure which can alter snowmelt patterns, affect headwaters ecosystems and wildlife use patterns, and affect demand for public safety and emergency response. Residential or commercial development in the alpine ecosystems and even tundra reduces the quality of the public lands experience for the public and can be visible from wilderness areas.
- **Comment** – Thank you for the information regarding the expected staffing challenges of the Realty Specialist positions in the USFS. This specialist is mission critical to many actions on the forest, not just land adjustments and the plan should make a recommendation as to the expected length of time to process certain actions with a dedicated Realty Specialist and without. The GMUG is the largest national forest in the Rocky Mountain Region, and there is a great need for staff who have the site-specific knowledge and are able to efficiently process complex actions to fulfill plan objectives.
- **Comment** – The revised plan should request Congress or the Secretary of the Interior to withdraw the land under the Matterhorn Mill and Ames hydroelectric plant penstock from mineral entry (mining withdrawal). This may be appropriate for other listed Priority Heritage Assets. Wildfire mitigation measures to reduce the risk of losing these assets to a wildfire should be contemplated.
- **Comment** – Another key issue is to consider withdrawal of mineral entry (mining and leasing withdrawal) in roadless areas having low to moderate mineral resource potential, as the emphasis for the forest should be to allow mining where there is a high enough mineral potential to balance the disturbances to the forest, especially in high quality and functioning roadless areas. Mining in roadless areas should be highly restricted, such as with non-waivable hardwired No Surface Occupancy (NSO) stipulations.
- **Comment** – San Miguel County supports withdrawals (mining and leasing withdrawal) from mineral entry to protect special cultural or historic features, fens, or prevent extreme conflicts when the conflict would negatively impact the local or regional economy (such as closing a trail system, campground, ski area, etc. to allow for mining activity). The plan should withdrawal from mineral entry (mining withdrawal) the lands under resources like the Matterhorn Mill, Ames hydroelectric plant and penstock facilities, and other historic or cultural features where surficial disturbance or vibrations could destroy these irreplaceable resources.

- **Comment** – Elsewhere in our comments on the individual assessments we have recommended that the USFS pursue mineral withdrawal from Congress and/or the Secretary of the Interior in certain situations.
- **Comment** – San Miguel County has worked with willing private landowners, land trusts and other agencies to help facilitate conservation easements or purchase of development rights through our Land Heritage Program. We would appreciate being able to partner in developing strategies and relationships to accomplish conservation easements that benefit the missions of the USFS GMUG and the County's Land Heritage Program.
- **Comment** – It appears that there are 16.3 miles of NFSR crossing non-FS inholdings without GMUG documented rights-of-way. San Miguel County desires that all historic public rights-of-way be documented. The USFS should work with San Miguel County to see if any of these segments are cross-claimed as county roads. Routes that are in jeopardy of being closed should be prioritized for jurisdictional resolution. Historic public trails and rights-of-way should generally remain open unless there is a county vacation.
- **Comment** – The revised forest plan should contemplate an increase in commercial filming, photography, and weddings within the GMUG. San Miguel County is supportive of the film and creative industries. The GMUG should look for ways to enable these activities while ensuring there are no long-term impacts to ecosystems or sensitive resources such as plants or wildlife. Events should be coordinated to have minimal impact on other forest users, such as trail users.
- **Comment** – We agree that there is likely to be residential development pressures that affect adjacent USFS GMUG lands in the future. We support a potential mitigation mechanism to perform forest land adjustments or land exchanges to allow high conflict lands adjacent to populated areas to be used for public benefits such as affordable housing and community infrastructure, in exchange for assistance in the acquisition of inholdings. Land exchanges may not always be feasible. Due to the lack of realty specialists and staff capacity, GMUG should work with communities having an affordable housing crisis to identify priority areas to focus on. These areas should be proximal and accessible to population centers, services, existing infrastructure, and transit. This will have benefit for the USFS as well, by reducing long-term dispersed camping and associated resource damage on the forest near communities, and reducing some wildfire risk from associated campfires. It appears the USFS and County are in agreement from the assessment statement (pdf pg. 15), "Land adjustment activities involving NFS lands may be one tool to help provide land for affordable housing that will contribute to the social sustainability of these communities." The USFS should meet directly with elected officials in each county to examine where there may be mutually beneficial land adjustment parcels to prioritize and mention in the revised plan.
- **Comment** – The general direction for land adjustments in the current plan should be modified to include additional scenarios for prioritizing lands for acquisition as discussed above, including for roadless areas, popular recreation areas, and for affordable housing.
- **Comment** – Would it be beneficial for the revised plan to request a temporary detail or increase in realty specialists to accommodate some backlog of transactions?

15. Planning Topics: Existing designated areas located in the plan area including wilderness and wild and scenic rivers and potential need and opportunity for additional designated areas

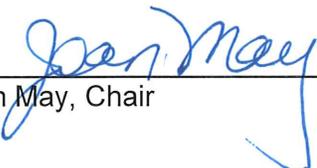
a. Specific Comments on Draft Assessment: Designated Areas

- **Comment** – Please define CDNST (pdf pg. 5) for those who aren't familiar with the term. (Continental Divide National Scenic Trail).
- **Comment** – The assessment identifies a gap of published documents studying how designated areas contribute to social, economic, and ecological sustainability in the broader landscape affected by the GMUG National Forests. We suggest that by some accounts there is a large body of peer-reviewed literature on the value of Wilderness and other land designations to nearby communities. Headwaters Economics summarizes this point in a 2011 fact sheet (http://headwaterseconomics.org/wp-content/uploads/Value_Wilderness_Studies.pdf) and in a 2013 annotated bibliography (http://headwaterseconomics.org/wp-content/uploads/Annotated_Bib_Value_Public_Lands.pdf). There may be more recent compilations.
- **Comment** – The USFS is required to manage Wilderness Areas to preserve wilderness character. The current Wilderness Stewardship Performance scores (based on a new scoring system that began in 2016) that are presented in Table 2 (pdf pg. 10) are lower than the scores achieved from 2005-2015. They score using different performance standards and criteria. The revised plan should include management directions that will improve the ability to measure and monitor wilderness character and performance scores. Regardless of the scoring system, the revised plan should contain management direction to protect and preserve wilderness characteristics and primitive conditions for visitors, and to monitor performance.
- **Comment** – The GMUG will complete the identification and eligibility evaluation study for Wild, Scenic, and Recreational rivers during this planning effort. The assessment indicates that the 2005 planning process identified 19 river/stream segments that were eligible. The USFS is required to make a determination on the presence of one or more Outstandingly Remarkable Values (ORVs) based on recommendations from an interdisciplinary team, best available scientific information, and public participation. San Miguel County desires to participate with the USFS during the evaluation process.
- **Comment** – San Miguel County supports the revised forest plan adhering to the management directions in the 2012 Colorado Roadless Rule.
- **Comment** – The revised plan should provide careful management direction to protect the vistas and scenic integrity of the forest as viewed from the San Juan Skyway and the Scenic Byway corridors within San Miguel County.
- **Comment** – The Alpine Loop is described in this assessment (pdf pg. 20) as a high clearance 4-wheel drive route that travels between Lake City and Ouray. These are largely BLM lands. The local communities consider the greater Alpine Loop to connect Telluride, Silverton, Ouray, and Lake City areas via additional 4-wheel drive passes that include Imogene Pass and Black Bear Pass. These areas are largely USFS lands. The greater Alpine Loop should be recognized in this assessment and in the revised plan.
- **Comment** – Currently there are no Research Natural Areas (RNAs) designated in the GMUG within San Miguel County. San Miguel County and communities should be consulted to see if there is an area that they might wish to see considered for an RNA in the future, during the life of the revised plan.

- **Comment** – Currently the only Special Interest Area designated by USFS within San Miguel County is the Ophir Needles area, which is a geologic Special Interest Area (SIA). Currently there are no facilities or special management actions at the site. According to the assessment, SIAs have a management prescription of “10C”, which emphasizes protection and where appropriate, fostering public education and enjoyment of the SIAs. San Miguel County should be consulted for recommendations on any special management direction included in the revised plan.
- **Comment** – San Miguel County Board of County Commissioners has passed resolutions in full support of passage of the San Juan Wilderness Act which has been introduced in multiple sessions of Congress. If it is reintroduced, the San Miguel County Board of County Commissioners should be consulted to affirm support of any boundary modifications.
- **Comment** – We support the acknowledgment of a need for a wider variety of terrain and habitat in future Wilderness Areas.
- **Comment** – We agree that San Miguel County receives positive economic, social and environmental impacts from Wilderness and other special designations.
- **Comment** – San Miguel County should be consulted for a recommendation on the specific management prescription level for Wilderness Areas in San Miguel County which include Lizard Head Wilderness and Mount Sneffels Wilderness.
- **Comment** – The assessment states that there will a process separate from this assessment “to inventory and evaluate potential wilderness” (pdf pg. 38). San Miguel County wants to be heavily involved in this process. The July 2006 Comprehensive Evaluation Report (CER) recommended several potential Wilderness Areas, including Whitehouse Mountain, Last Dollar/Sheep Ck, and Wilson.
- **Comment** – Recommend adding a column for County, to show which counties the recommend areas intersected, to Tables 11, 12, 13, and 14 (pdf pg. 39-43).

Sincerely,

SAN MIGUEL COUNTY, COLORADO
BOARD OF COUNTY COMMISSIONERS



Joan May, Chair