

MONTROSE COUNTY
BOARD OF COUNTY COMMISSIONERS
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May 14, 2018

Grand Mesa, Uncompahgre and Gunnison National Forests
Attn: Shane Walker
2250 South Main Street
Delta, CO 81416

Re: GMUG Plan Revision Scoping Document – Montrose County Comments

Dear Shane:

Please accept this letter as formal comment from the Montrose County Board of County Commissioners. We appreciate the brevity of the scoping document and the stated intent of the GMUG to emphasize local input in this planning process. We look forward to continued engagement throughout the development of the revised plan.

Page 1 - We request that the economic importance of the GMUG to local communities be expressly mentioned in the vision statement.

Page 3 – Provide Strategic, Adaptive Direction

We commend the Forest Service for endeavoring to increase the prevalence of adaptive management in the forest plan. We suggest that the Forest Service incorporate adaptive management into all activities (recreation, timber, habitat, etc.). This section of the scoping document would be an appropriate place to insert a statement of the agency's intent to make adaptive management an overarching goal for all management activities.

Page 3 – Contribute to Social and Economic Sustainability

We suggest that this section be divided into two separate sections. One would be dedicated to "Maintain and Increase Economic Production" while the other could be "Insure Social and Recreational Sustainability".

A majority of the bullet points in this section of the draft deal with social and recreational pressure. These issues are critical to the forest plan; however, these are distinct from economic issues. Separate analysis and discussion will allow for more clarity in the plan.

Within the newly added “Maintain and Increase Economic Production” section, we request that the following points be noted:

- ✓ Recognize the Forest Service’s express obligation to provide for sustained timber production on the GMUG.
- ✓ Recognize that agriculture remains a primary economic base in GMUG counties and that the economic sustainability of these counties is in part tied to production and grazing permits on the GMUG.
- ✓ Recognize the economic importance of recreation to local communities and the need to apply multiple use management within the subcategory of recreation to provide for expansion of diverse recreational opportunities.
- ✓ Recognize the need to preserve decisional flexibility to provide for future authorizations of resource extraction.
- ✓ Recognize the need to preserve decisional flexibility to allow for future water development needs in the area.

Page 4 – Provide for Ecological Sustainability

We request that the Forest Service give significant consideration to the Colorado Water Plan and the need to develop additional storage at new locations. Accordingly, we ask that the example related to preference of reservoir expansion over new construction be removed from the scoping document. Given population projections for the GMUG area and Colorado as a whole, we encourage the Forest Service to acknowledge that development of new reservoir sites is inevitable.

Development of new reservoir sites should be given special consideration in the plan to allow for accommodation of future water storage projects. In some instances, opportunities for smaller reservoirs in areas of surplus runoff may be preferable to expansion of existing reservoirs.

Page 5 - Maintain the Diversity of Plant and Animal Communities

We request that the role of timber harvest in vegetation management be analyzed/considered as a means of reducing catastrophic wildfire and by extension protecting wildlife habitat.

Page 6 – Part III: Management Area Framework

Given that the GMUG is comprised of three very different forests, it may be more practicable to pursue “forest wide direction” that is appropriate within the individual forests (Grand Mesa, Uncompahgre and Gunnison) as opposed to direction that would be applicable to the entire GMUG. This would be in keeping with the goal of making this plan clear, specific and user friendly.

We suggest working with the counties at the earliest possible date to define geographic planning and/or management areas for the plan. The counties are an excellent source of information related to the preferences of local stakeholders and the broader public. County involvement in defining the geographic areas within the plan would lead to less need for revision at later stages.

Page 7 – “Natural Processes Dominate” and “Backcountry, Including Non-Upper Tier Colorado Roadless Areas”

There are several predetermined designations (wilderness, Upper Tier Colorado Roadless Areas, Tabeguache and Roubideau Areas) that will largely dictate land management for those areas regardless of the outcome of the plan revision. In many instances, these same areas are suitable for quiet recreation and habitat management.

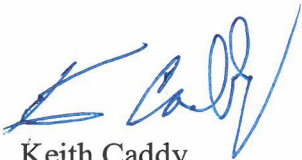
We suggest that the Forest Service approach this plan revision with the goal of utilizing these predetermined designations to meet quiet recreation, backcountry and habitat needs. This practice would promote multiple use by maximize the remaining acreage of the GMUG for other uses. Specifically, these two sections of the scoping document could be combined and rewritten to state this goal.

Page 8 – Highly Developed Areas

We request that the Forest Service consider that timber production may be appropriate and useful in certain highly developed areas as a means of reducing wildfire threat.

Please address any communication related to these comments directly to Government Affairs Director, Jon Waschbusch at jwaschbusch@montrosecounty.net or (970)252-4549. Thank you.

Respectfully,



Keith Caddy
Chairman

Roger Rash
Vice Chairman



Glen Davis
Commissioner