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GMUG National Forest
Attn: Forest Plan Revision Team
2250 S. Main St.
Delta, CO 81416

Via online comment:

<https://cara.ecosystem-management.org/Public//CommentInput?Project=51806>

RE: Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision #51806: Scoping, March 2018

Dear Responsible GMUG officials:

Thank you for the opportunity to provide comments on the Scoping document released by U.S. Forest Service (USFS) dated March 2018. The Ouray County Board of County Commissioners and its staff have been active in attending public meetings and webinars held between summer 2017 and the present. Ouray County has many facets of interaction with forest issues and spends a great deal of time on forest-related matters, including with the State Forest Health Advisory Council; the State Emergency Fire Fund Committee; The Public Lands Partnership; and the West Region Wildfire Council; in addition to this direct engagement with the USFS. We have previously commented on the draft Forest Assessments; Wilderness Inventory; and Wilderness Criteria, and are pleased to provide these comments on the draft Scoping Materials.

These comments have been informed by the GMUG Scoping document as well as by information obtained during the multi-county meeting on May 3, 2018, and by participating in a GMUG Scoping webinar. As such, we understand that these comments address the "30,000 foot perspective" of this point of the process, and will not include site-specific analysis which is more particular to Ouray County alone. Therefore, in producing today's comments, we have tried to keep in mind the organization of the scoping materials and the framing questions posed by GMUG in the Scoping Guide, as summarized here:

I. Forest Plan Vision, Roles, and Contributions of the GMUG

- *Is this a vision that you can get behind?*
- *Did we capture the GMUG's unique roles and contributions within the broader landscape?*

II. Key Needs for Change

- *Do these needs for change reflect the major issues that we should concentrate on in plan revision?*

III. Management Area Framework

- *Do the guiding principles laid out in the beginning make sense?*

- *Do the themes and categories capture the areas that will require unique direction and plan components?*
- *Does the framework meet the need for direction accessible to both the Agency and the public?*

OURAY COUNTY COMMENTS ARE AS FOLLOWS:

I. Forest Plan Vision, Roles, and Contributions of the GMUG

Ouray County supports the “Big Picture” and “Why GMUG Matters” content of the Scoping document.

The Scoping document identifies two primary roles of the GMUG:

- **Public enjoyment** through recreation, scenic beauty, research and education, and cultural history; and
- **Commodity use** through being a source of water, timber, rangeland, coal, and functional game habitat. The discussion in this section also mentions the GMUG’s role in attracting tourists and year-round residents.

While public enjoyment and commodity uses are important roles and contributions, we think there are several unique and important GMUG roles missing from both the content and the nuances of the Scoping document. The Revised Forest Plan should incorporate these additional roles:

- Protecting and sustaining healthy watersheds which provide for water quality and quantity to support functional ecosystems and human needs;
- Protecting and sustaining biological and ecological diversity for a variety of special and rare ecological communities and species;
- Providing beneficial social, cultural, recreational, and economic opportunities;
- Providing ecosystem services that are resilient to the impacts of climate change;
- Improving the quality of life for adjacent communities and forest visitors; and
- Protecting and sustaining the rights of mineral rights owners (in addition to those of carbon and hydrocarbon mineral rights) to also pursue their commodity production activities.

II. Key Needs for Change

The “key needs for change” frame provides foundational principles for the Revised Forest Plan. The seven themes within this frame do appear to have the ability to scope the key issues that are unique to the GMUG contained in the assessments. Because the Scoping document itself is rather short, it is challenging to say whether all the needs for change and key issues identified during the assessment phase of this process will be captured within the Revised Forest Plan after this point.

1. **Comments on Theme 1: Provide strategic, adaptive direction.** “Maintain or restore ecological integrity; air, soil and water; and riparian areas, taking into account stressors such as wildland fire, insect and disease, and changes in climate.”

This was described in the webinar as including the development of a strategic monitoring plan to meaningfully inform implementation of the adaptive plan components of the Revised Forest Plan.

The Revised Forest Plan should define the difference between adaptive “direction” and “management”.

We previously commented that adaptive management should be performed at more site-specific or localized scales than forest-wide. It should incorporate adaptation to the effects of climate change. It should integrate adaptive management plans developed and implemented through collaborative partnerships such as modeled by SBEADMR with robust monitoring and evaluation appropriate to accurately measure outcomes from management activities.

The Scoping document takes a different direction and states that monitoring should focus on landscape-level changes and utilize remote sensing technology “as much as practicable.”

Adaptive management must incorporate monitoring, assessment, and evaluation at a frequency and scale adequate to be able to make timely adaptive adjustments to the management direction to ensure achieving desired conditions.

The type and size of the resource being monitored should dictate the technology and strategies employed. For example, monitoring visitor numbers and types of vehicles on the alpine passes of Hinsdale, San Juan, San Miguel, and Ouray Counties may require a different monitoring scale, frequency, and strategy than monitoring for insect or disease on the Grand Mesa or Uncompahgre Plateau.

The forest plan should incorporate adaptive management strategies with monitoring, assessment, and evaluation at a frequency and scale that will assure protection, improvement and/or maintenance of desired conditions for ecosystems and biodiversity. Remote sensing should be viewed as a monitoring tool but cannot entirely replace site-specific and on-the-ground monitoring.

The GMUG is comprised of three different national forests influenced by a wide-range of elevation and geological differences as well as different watersheds that can experience very different precipitation patterns from each other during a single season. Different portions of the forest having similar vegetation types may be experiencing drastically different moisture or climate conditions, where different management strategies may be needed based on moisture vs. land cover type. For example, in April of 2018, the northern portion of the GMUG had snowpack levels of approximately 86%; the Gunnison River basing had 60% snowpack, while the Uncompahgre and San Miguel river basins were below 40% snowpack. Adaptive management should be able to provide management directions appropriate for varied conditions across the three forests, even in similar management area types or vegetation communities.

2. Contribute to Social and Economic Sustainability:

3.

“Provide people and communities with a range of social and economic benefits for present and future generations. These benefits include water, timber production, range, recreation, energy resources, and additional multiple uses.”

The GMUG planning team has indicated that they are aware of needing to improve management of diverse and sustainable recreation opportunities in the forest.

In Ouray County, we spend an increasing amount of county staff time and resources to ensure access to sustainable recreation opportunities in the forest. This is particularly true for wintertime recreation, and we see increasing conflicts between motorized and non-motorized wintertime recreational uses. The Revised Forest Plan should ensure that areas demonstrating high non-motorized wintertime uses are in fact designated as such.

Within the bullets provided under this theme in the Scoping document, there is a reference to “landscape-scale strategy”. Please define in the Revised Forest Plan the terms “landscape-scale” vs. “local scale” and “plan scale.” Also, when using the term “forest-wide,” please clarify if this term is synonymous to “GMUG-wide” or if this term breaks down to the national forest level where the Gunnison National Forest is distinct from the Uncompahgre National Forest and the Grand Mesa National Forest. The GMUG plan is the only plan in the country that combines management of three different national forests into one plan.

Recreation patterns and modes of motorized and non-motorized transportation have changed dramatically from the last forest planning period to the present. For example, contemporary ATV / OHV vehicles negotiate steeper terrain at faster speeds and create wear patterns on routes differently than older generation ATV / OHV vehicles. Mountain and snow bikes have also increased demand for trails. Routes previously too rugged, narrow or steep to be accessed other than by horseback or hiking are now accessed by motorized and/or mechanized technology. The Revised Forest Plan should anticipate continued evolution of recreation patterns, modes of transportation and increased demand for recreational opportunities; as well as how to better manage these uses and segregate them from non-motorized uses. Demand management should be considered where the number of uses exceeds the capacity of the resource for these uses.

Sanitation needs to be planned for and prioritized in areas having concentrated human use. Adaptive management should consider visitor use thresholds as triggers for prioritizing locations for sanitation systems and upgrades in addition to being used to determine camping management tools.

The bullet in this section that reads "...identify the project timber sale quantity and projected wood sale quantity" as a response to mortality from insects, disease or climate impacts should be modified. It should emphasize forest health treatments that prioritize safety. The Revised Forest Plan should also reference the GMUG Spruce Beetle Epidemic and Aspen Decline Management Response (SBEADMR) project, and incorporate adaptive management plans that allow for local collaborative management groups such as the SBEADMR Adaptive Management Group (AMG). Conducting adaptive management in partnership with collaborative stakeholder groups will increase the odds of the GMUG having a meaningful contribution to social and economic sustainability to the diverse gateway communities and counties within and adjacent to the GMUG. The revised plan should emphasize forest health treatments that prioritize safety in Wildland Urban Interface (WUI) and recreational trail areas, and designed to improve ecosystem functions and not degrade visual resources, which are important to our economy.

The Revised Forest Plan should also protect historic cultural uses by indigenous peoples and tribes.

4. Provide for Ecological Sustainability:

"Maintain or restore ecological integrity; air, soil and water; and riparian areas, taking into account stressors such as wildland fire, insect and disease, and changes in climate."

The Revised Forest Plan should encourage "Good Samaritan" activities, including the type that we have seen in Ouray County recently where public-private partnerships (PPPs) target the cleanup of legacy mining activities.

In addition to ensuring that forest resources are not degraded as a result of future pollutant deposition or critical load exceedances, the Revised Forest Plan should also ensure that forest biological resources are maintained at a high level and not degraded from projects and activities allowed by the Revised Forest Plan.

5. Maintain the Diversity of Plant and Animal Communities:

"Provide ecological conditions to maintain biodiversity, including additional consideration for threatened and endangered species, species of conservation concern, and species of public interest like big game."

The language provided emphasizes maintenance of existing conditions. However, the assessment process documented needs for plan revision. The Revised Forest Plan should instead emphasize management direction to minimize impacts and to provide for improving or maintaining these communities and ecosystems so that they are resilient.

6. Integrate Resource Management for Multiple Uses and Ecosystem Services:

According to the Scoping document, a key change will be to change direction for soil productivity. Rather than being tied to timber management, it will be tied to an area's use.

The Revised Forest Plan should provide direction for improving or maintaining a broader range of ecosystem services that are equally important. These are watershed health, water quality and quantity, water retention in functional fens and wetlands, and carbon sequestration.

7. Incorporate Best Available Science, Update to Existing Law and Policy:

“Provide direction that reflects the best available science and management approaches, and yet remains durable and relevant through time in our rapidly changing environment.”

The Revised Forest Plan should provide direction to incorporate species conservation assessments and strategies for existing or new designations under the Endangered Species Act (ESA). The Scoping document mentions the 2013 Lynx Conservation Assessment and Strategy. The Revised Forest Plan should anticipate one becoming available for Gunnison Sage-Grouse and even other species.

“Best Available Science” needs to include consultation with subject matter experts, and state and federal partner agencies, academia, and local knowledge.

8. Build an Accessible, Useful Plan:

“Create a plan that is more purposeful, accessible and useful to the public and agency personnel. The current Forest Plan is unwieldy and overly complicated.”

The objectives of this theme are to ensure that the Revised Forest Plan is “clear and specific,” “user-friendly” and “necessary.” In striving to achieve this, the Revised Forest Plan should also respect that the GMUG is a combination of three separate National Forests containing nearly 3 million acres across nine counties. The GMUG contains several mountain ranges and river basins, and elevations ranging from 5,800 to 14,309 feet. There needs to be a balance between the GMUG goal of building a more simplified forest plan and the ability to effectively manage a huge landscape with diverse topographical, climate, hydrological and geological conditions.

III. Management Area Framework:

Ouray County appreciates the desire for an adaptive, strategic, streamlined plan that is easy to use. However, we are concerned about the operational principles laid out

on Page 6 of the Scoping document, which state that forest wide direction should be appropriate forest wide, and management direction that is appropriate for one management area in one part of the forest should be appropriate for the same management area elsewhere in the forest. It may not be realistic to manage for ecological integrity and sustainability and appropriate social, cultural and economic opportunities throughout the entire GMUG area with a one-size-fits-all approach.

Will the same classification of management area type be managed the same across all three national forests and several different hydrologic basins? For an adaptive and strategic management plan to be implemented across 3 million acres with roughly 8,500 feet of elevation difference and numerous ecosystems controlled by topography, soil, mineral, watershed and climatic conditions. The Revised Forest Plan should be able to provide objectives and direction to address the diverse needs of ecosystems that may be experiencing drastically different levels of drought or moisture and socio-economic conditions.

The Scoping document provides six management “themes” with their “tentative” descriptions. The six themes contain examples that mix and match “Designated Areas” (e.g., Wilderness, Wilderness Study Areas, Colorado Roadless Areas, and Research Natural Areas) and non-designated “Management Areas.” Having sub-themes for Designated Areas and Non-designated Areas within some of the themes, such as themes 1-4, may increase clarity.

1. Natural Processes Dominate:

“Tentative description: In these areas natural processes dominate. Not suitable for timber production or harvest.”

The examples provided in the Scoping document are Designated Wilderness Areas, Recommended Wilderness Areas, and Upper Tier Colorado Roadless Areas (CRAs).

These examples are all consistent with a management direction that does not allow for any new significant habitat fragmentation. If this is accurate, then it is recommended that language be added reflecting that natural processes dominate and habitat linkages are retained or improved. The Upper Tier CRAs are not suitable for new mineral leasing or surface occupancy.

However, there are different levels of mineral extraction, motorized and/or mechanized activities allowed within the listed examples. It may be useful to add another theme to separate the areas with wilderness characteristics and primitive qualities vs. the Upper Tier CRAs.

2. Special Areas and Unique Landscapes (All Research Natural Areas, Special Interest Areas):

“Tentative description: Management emphasis is tailored toward unique features of the particular area. Not suitable for timber production or harvest.”

The title of this them could be simplified to read "Research Natural Areas, Special Interest Areas, Special Areas and Unique Landscapes". The Revised Draft Forest Assessment for Designated Areas describes existing management prescriptions having site-specific levels of protective stipulations. These areas all appear to have requirements for visual quality management and currently have a range of permitted activities/uses and protective stipulations.

3. Backcountry, Including Non-Upper Tier Colorado Roadless Areas:

"Tentative description: Recreation is more primitive/semi-primitive, and there are opportunities for both motorized and non-motorized recreation."

This theme also appears to contemplate a combination of designated areas (non-upper tier CRAs) and non-designated areas. CRAs are designated for watershed and wildlife habitat protection without some of the limitations as Upper Tier CRAs. It is recommended that language be added to the description recognizing that these areas also protect areas that are important for water conservation and wildlife habitat.

Expectations of primitive backcountry experiences are that they have few or no roads and preserve natural conditions and scenic beauty. This theme should have management direction to meet these expectations.

4. Recreation Focus Areas/High-Use Recreation Emphasis:

"Tentative description: Overall management emphasis is on providing a high-quality recreation opportunity for a moderate/high volume of users. Some locations may be suitable for timber production with adequate controls for impacts to scenery. Timber harvest for other purposes may occur throughout. Vegetation management emphasis would be for public safety and scenery management."

The Scoping document lists Ski Areas, developed recreation areas and dispersed recreation areas as examples of areas within this theme. Designated trails and scenic byways would also be within this theme.

We recommend strong visual resource management for areas proximal to and within view corridors of scenic byways and designated national trails.

5. General Forest/Active Management:

"The forests are actively managed for a variety of multiple uses and management objectives. Suitable for timber production. Motorized and non-motorized recreation objectives are distributed throughout. This includes the

Wildland Urban Interface (WUI) areas of the Forests and extends to the edge of backcountry areas.”

We recommend incorporating an adaptive management approach using thresholds or triggers for identifying when General Forest/Active Management areas would transition to management under another theme, such as a recreation focus or backcountry focus area.

6. Highly Developed Areas (non-recreation emphasis, i.e., utility corridors):

“Tentative description: not [sic] suitable for timber production, though timber harvest for other purposes may occur. Vegetation management emphasis on defensible space, fuels management.”

The Revised Forest Plan should emphasize the protection of scenic resources and minimize habitat fragmentation by requiring undergrounding of utilities, distribution lines, and pipelines whenever the voltage does not require above-ground infrastructure.

Some issues or management situations are not captured in the six themes contained in the Scoping document. These include:

- Stream segments suitable for Wild and Scenic River designation, and
- Potential special areas that have wilderness characteristics, fragile landscapes, and/or essential habitat which should be managed similar to wilderness or in a manner that conserves, protects, and enhances the resources and values of such an area. These areas could allow one or more historic uses, such as a permitted running race, continuation of historic grazing allotments, snow grooming for Nordic skiing activities, and heli-skiing, when it is consistent with conservation, protection or enhancement of identified resources and values.

Thank you for the opportunity to provide these comments during the scoping process. Ouray County will continue with active participation in the forest plan revision process.