



## BOARD OF COMMISSIONERS

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Via online public comment tool:

<https://cara.ecosystemmanagement.org/Public//CommentInput?Project=51806>

June 2, 2018

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

Dear Responsible GMUG Officials,

San Miguel County Commissioners and staff appreciate the opportunity to provide comments on the scoping document released by U.S. Forest Service dated March 2018<sup>1</sup>. The San Miguel County officials attended public meetings and webinars from summer 2017 to the present. Previously we commented on the draft Forest Assessments<sup>2</sup>, Wilderness Inventory<sup>3</sup>, Wilderness Criteria<sup>4</sup>, and are incorporating these documents through the links listed below.

Our scoping comments were informed by the Grand Mesa, Uncompahgre and Gunnison National Forest scoping document, information obtained during the multi-County meeting on May 3, 2018, and from listening to a GMUG scoping webinar. These comments considered the organization of the scoping materials and the framing questions posed by GMUG in the scoping guide:

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<sup>1</sup> <https://www.fs.usda.gov/detail/gmug/landmanagement/planning/?cid=fseprd574889>

<sup>2</sup> See San Miguel County Comments “Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision #51806 Draft Forest Assessments,” submitted on December 8, 2018 ([https://cara.ecosystemmanagement.org/Public/DownloadCommentFile?dmdId=FSPLT3\\_4110617](https://cara.ecosystemmanagement.org/Public/DownloadCommentFile?dmdId=FSPLT3_4110617)) and “Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision #51806 Draft Forest Assessments: Air Quality Assessment & At-Risk Species Assessment” submitted on January 29, 2018 ([https://cara.ecosystemmanagement.org/Public/DownloadCommentFile?dmdId=FSPLT3\\_4178387](https://cara.ecosystemmanagement.org/Public/DownloadCommentFile?dmdId=FSPLT3_4178387)).

<sup>3</sup> See San Miguel County Comments “San Miguel County Comments on the GMUG Wilderness Inventory #NP-1810,” submitted on January 22, 2018 ([https://cara.ecosystemmanagement.org/Public/DownloadCommentFile?dmdId=FSPLT3\\_4175265](https://cara.ecosystemmanagement.org/Public/DownloadCommentFile?dmdId=FSPLT3_4175265)).

<sup>4</sup> See San Miguel County Comments “San Miguel County, Colorado, Comments on DRAFT: Evaluation of Wilderness Characteristics for Lands that may or may not be Suitable for Inclusion in the National Wilderness Preservation System #NP-1810,” submitted on March 7, 2018 ([https://cara.ecosystemmanagement.org/Public/DownloadCommentFile?dmdId=FSPLT3\\_4272775](https://cara.ecosystemmanagement.org/Public/DownloadCommentFile?dmdId=FSPLT3_4272775)).

## 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?*

## Key Needs for Change

- *Do these needs for change [identified during the assessments] reflect the major issues [key issues from assessments and those that are unique to GMUG] that we should concentrate on in plan revision?*

## 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?*

## SAN MIGUEL COUNTY COMMENTS:

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

We learned during the multi-County meeting with the GMUG planning team that a working group created the vision statement provided in the scoping document following community meetings across the GMUG in the mid-2000s. We support 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 attracting hunters. The discussion in this section also mentions the GMUG's role in attracting tourists and year-round residents.

The GMUG planning team has asked the public whether or not the scoping document has captured the GMUG's unique roles and contributions. While public enjoyment and commodity uses are important roles and contributions, we think there are several unique and important GMUG roles missing from the scoping document. The Revised Forest Plan should incorporate these additional roles:

- Protecting and sustaining healthy watersheds that 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;
- Protecting and enhancing wildlife core and corridor areas to allow for changing migration patterns that may result from changing climate conditions;
- Providing beneficial social, cultural, recreational, and economic opportunities;
- Providing ecosystem services that are resilient to the impacts of climate change<sup>5</sup>;

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<sup>5</sup> <https://toolkit.climate.gov/topics/ecosystems>

- Maintaining and improving soils and vegetation to increase carbon sequestration capacity of the GMUG forest lands; and
- Improving the quality of life for adjacent communities and forest visitors.

## II. Key Needs for Change

This section of the scoping document is organized into seven major themes. The additional information and clarification provided by GMUG during the May multi-County meeting helped us understand that the key needs for change also can be considered foundational principles for the RFP. Our comments align with the themes presented in the scoping document.

In response to the GMUG planning team’s overall question on this section, the seven themes do appear to encompass the key issues in the assessments that are unique to the GMUG. However, the brevity and format of the scoping document leave us uncertain that all the needed changes and key issues identified during the assessment phase will be addressed.

### Comments by theme:

**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.”

- In the webinar, this goal included developing a strategic monitoring plan to meaningfully inform implementation of the adaptive plan components of the RFP.
- The RFP should clarify the difference between adaptive direction and adaptive management.
- San Miguel County has previously commented that adaptive management should be performed more site-specifically or on a localized scale rather than forest wide. It should incorporate adaptation to the effects of climate change. It also should integrate adaptive management plans developed and implemented through collaborative partnerships, such as those modeled by SBEADMR (spell out this acronym) with robust monitoring and evaluation appropriate to accurately measure outcomes from management activities.<sup>6</sup> However, 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.” What basis will determine what is “practicable?” Will monitoring costs be the driving factor?
- Adaptive management must incorporate monitoring, assessment, and evaluation at a frequency and scale adequate to make timely adjustments to the adaptive management direction to achieve the desired conditions. There should be a requirement to demonstrate validity and accuracy of remote sensing at a scale and frequency appropriate for the resource being monitored.
- The type and size of the resource being monitored should dictate the technology and strategies employed. For example, fens or riparian ecosystems may require a different

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<sup>6</sup> See San Miguel County Comments “Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision #51806 Draft Forest Assessments,” submitted on December 8, 2018 and “Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision #51806 Draft Forest Assessments: Air Quality Assessment & At-Risk Species Assessment” submitted on January 29, 2018.

monitoring scale, frequency, and strategy than monitoring for insect or disease on the Grand Mesa or Uncompahgre Plateau.

- The RFP should incorporate adaptive management strategies with monitoring, assessment, and evaluation at a frequency and scale that will ensure protection, improvement, and/or maintenance of desired conditions for ecosystems and biodiversity. Remote sensing should be viewed as a monitoring tool, but it cannot entirely replace site-specific and on-the-ground monitoring. Management changes may require testing for desired results on subsets of the GMUG before they are implemented across the broader forest or landscape.
- The GMUG is comprised of three different national forests. These are influenced by a wide range of elevations, geological compositions, and watersheds that can experience very different precipitation patterns during a single season. Different sections of the forest that have similar vegetation types may experience drastically different moisture levels or climate conditions and may need different management strategies based on moisture vs. land cover type. For example, in April 2018, the northern portion of the GMUG had snowpack levels of approximately 86% of the annual average, whereas the Gunnison River basin snowpack was at 60%, and snowpack of the San Miguel and Uncompahgre basins were below 40%. Adaptive management should be able to provide direction appropriate for varied conditions across the three forests, even in similar management area types or vegetation communities.
- We appreciate that the GMUG understands the need to form topic- or area-specific adaptive management groups to evaluate management techniques, goals, objectives, and direction in different sections of the forest.

#### **Contribute to Social and Economic Sustainability**

“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.”

- In the webinar, the GMUG planning team indicated a need to improve management of diverse and sustainable recreation opportunities in the forest.
- We recommend incorporating cultural sustainability into this theme. The scoping document mentions protecting cultural resources and managing areas of tribal importance, as well as protecting contemporary cultural uses. The GMUG is entirely within the ancestral homeland of the Utes and maintains “government to government” relationships with three federally recognized tribes.
- The RFP also should protect historic cultural uses by indigenous peoples and tribes. There is precedent in the recent Gila National Forest draft Land Management Plan, created under the 2012 planning rule, to include, “Social, Cultural, and Economic Sustainability”.<sup>7</sup> Although there are no designated tribal lands within San Miguel County, we ask that the GMUG diligently consult with tribes who have historically used GMUG forest lands in an effort to preserve cultural sites and uses. SMC is formally engaged in a process of reconciliation with the Ute tribes and would be willing to help facilitate this process.

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<sup>7</sup> [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd573667.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd573667.pdf)

- The RFP needs to accommodate the different socio-economic conditions and needs of the different GMUG gateway communities. For example, some communities and counties may desire more commercial timber production, while San Miguel County’s culture and economic engines are fueled by outdoor recreational opportunities.
- Recreation patterns and modes of motorized and non-motorized transportation have changed dramatically between now and the last forest planning period. For example, many riders now use new, “ultra” all-terrain vehicles that operate with increased speed and greater terrain coverage capabilities, creating different wear patterns than older generation ATVs. Mountain and snow bikes also have increased demand for the number and variety of trails. Routes previously so rugged, narrow or steep they only could be accessed on horseback or by hikers are now accessed by motorized and/or mechanized technology. The RFP should anticipate the continued evolution of recreation patterns, modes of transportation and the increased demand for recreational opportunities and should balance these with concurrent demands for quiet-use areas, as well as clean air, clean water, and biodiversity.
- The RFP should plan for sanitation needs prioritized in areas of concentrated human use. Adaptive management should consider visitor use thresholds as triggers for prioritizing locations for new sanitation systems and upgrades to existing systems, as well as in determining camping and recreation management tools.
- The RFP should emphasize undergrounding all infrastructure in utility corridors and rights-of-way and should mitigate impacts to habitat connectivity, scenic preservation, and other resources or uses unless site-specific conditions show more environmental damage or permanent impacts will occur from undergrounding than building above ground.
- The bullet in this section that reads, “...identify the projected timber sale quantity and projected wood sale quantity” as a response to mortality from insects, disease or climate impacts should be modified. In addition to these criteria, the plan should emphasize forest health treatments that prioritize safety.
- The RFP should incorporate adaptive management plans that allow for local collaborative management groups such as the SBEADMR Adaptive Management Group and the Upper San Miguel Basin Forest Health Landscape Assessment stakeholder group. We appreciate the GMUG’s recognition of the effectiveness of adaptive management partnerships with local stakeholder groups. Groups like the SBEADMR AMG will improve meaningful social and economic input from diverse gateway communities and counties and result in more effective implementation.
- SMC previously commented that the RFP 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.”<sup>8</sup>

**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.”

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<sup>8</sup> See San Miguel County Comments “Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision #51806 Draft Forest Assessments,” submitted on December 8, 2018; Page 17

- The webinar described this as providing for more ecosystem management at a landscape scale with an emphasis on management, restoration, and systems functions vs. programs, uses, and species.
- “Given increased water demand,” prioritize natural flood plain restoration projects that will enhance ecological integrity and provide effective natural water storage.
- Desired plant communities should consider likely natural vegetation migration patterns and not force the human-desired condition on species.
- In addition to ensuring that forest air quality resources “are not degraded as a result of future air pollution from atmospheric pollutant deposition or critical load exceedances,” the RFP should also ensure that forest air quality is maintained at a high level and not degraded from projects and activities allowed by the RFP.

### **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.”

- This theme emphasizes maintaining ecosystem characteristics, maintaining unfragmented habitat, maintaining rare ecosystems, and minimizing wildlife-livestock conflicts. The language provided emphasizes maintaining existing conditions. However, the assessment process documented a need for plan revision. The RFP instead should emphasize management to minimize impacts and improve or maintain these communities and ecosystems so that they are resilient and maintain biodiversity.
- The RFP should provide for improving or maintaining core areas that are linked by corridors to support migration of both vegetation and wildlife.

### **Integrate Resource Management for Multiple Uses and Ecosystem Services**

- According to the scoping document, a key change for the RFP 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 RFP 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.
- Productive soils are one of the most effective solutions for climate change. The RFP should emphasize the importance of improving productive soils across the GMUG in all soil types in order to sequester carbon.

### **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 RFP should provide direction to incorporate species conservation assessments and strategies for existing or new designations under the Endangered Species Act. The scoping document mentions the 2013 Lynx Conservation Assessment and Strategy. The RFP should anticipate similar type of assessments becoming available for Gunnison Sage-Grouse and other species.
- “Best Available Science” needs to include consultation with subject matter experts, state and federal partner agencies, academia, and local knowledge.

### **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 the RFP is “clear and specific,” “user-friendly” and “necessary.” We appreciate this is challenging since the GMUG is a combination of three separate national forests containing nearly 3 million acres across nine counties, several mountain ranges and river basins. Elevations range from 5,800 to 14,309 feet. We appreciate the challenge forest planners have in balancing the goal of building a more simplified forest plan and the ability to effectively manage a large landscape with diverse topographical, climate, hydrological and geological conditions.

### **III. Management Area Framework**

We appreciate 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. These principles 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.

Will the same classification of management area type be managed the same way across the entire GMUG and several different hydrologic basins? It may not be practical to manage for ecological integrity and sustainability and also for appropriate social, cultural and economic opportunities throughout the entire GMUG area with a one-size-fits-all approach. It may be necessary to implement adaptive management strategies in one hydrologic basin or in one part of the GMUG differently than others, even for the same vegetation community.

The adaptive and strategic management implemented by the RFP 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. It should also provide objectives and direction to address the diverse needs of the socio-economic conditions of different gateway communities. Appropriate assessment, monitoring, and evaluation measures will need to be utilized in order to quickly respond when a certain ecosystem or habitat is not meeting goals, standards or objectives in one part of the GMUG. Impacts from climate change are likely to be observed in different parts of the forest at different times. Adaptive management should be scalable so it can be implemented at a localized level to measure effectiveness prior to treating larger landscapes forest wide.

The May 2018 multi-County meeting included a discussion that management-area framework should emphasize use limitations compared with allowable uses. We were asked to consider the



categories of management areas presented and if we felt there are too many or types that were missing. The scoping document provides six management themes with their proposed descriptions.

The six themes contain examples that mix and match, such as “Designated Areas” (e.g., Wilderness, Wilderness Study Areas, Colorado Roadless Areas, 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.

### **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, Upper Tier Colorado Roadless Areas (CRAs), and Roubideau and Tabeguache Areas.
- These examples are all consistent with a management directive that does not allow for any new significant habitat fragmentation. If this is accurate, then we recommend adding language specifically to communicate 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. Roubideau and Tabeguache Areas that are currently managed as wilderness.
- Our prior comments on the Wilderness Inventory<sup>9</sup> and Wilderness Criteria<sup>10</sup>, should be considered in development of this theme in the RFP.

### **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 theme could be simplified to read, “Research Natural Areas, Special Interest Areas, Special Areas and Unique Landscapes”. The Revised Draft Forest Assessment for Designated Areas<sup>11</sup> 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.

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<sup>9</sup> See San Miguel County Comments “*San Miguel County Comments on the GMUG Wilderness Inventory #NP-1810*,” submitted on January 22, 2018.

<sup>10</sup> See San Miguel County Comments “*San Miguel County, Colorado, Comments on DRAFT: Evaluation of Wilderness Characteristics for Lands that may or may not be Suitable for Inclusion in the National Wilderness Preservation System #NP-1810*,” submitted on March 7, 2018).

<sup>11</sup> [https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/fseprd573536.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd573536.pdf)



- There is no mention or placeholder for Wild and Scenic Rivers in any of the six themes. If GMUG retains this theme structure for the RFP, the theme Special Areas and Unique Landscapes is a potential fit. Stream segments recommended for *Wild* designation also would potentially fit into the Natural Areas Dominate theme.

#### **Backcountry, Including Non-Upper Tier Colorado Roadless Areas**

“Tentative description: Recreation is more primitive/semi-primitive, and there are opportunities for both motorized and nonmotorized 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. We recommend adding language to the description recognizing that these areas also offer protection 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.

#### **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.

#### **General Forest/Active Management**

“The forests are actively managed for a variety of multiple uses and management objectives. Suitable for timber production. Motorized and nonmotorized recreation objectives are distributed throughout. Includes the wildland urban interface/front-country 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.
- It is unclear from the scoping document if the GMUG would consider all wildland urban interface (WUI) areas as general forest/active management areas or if it will manage WUI areas that are designated or proposed for wilderness under the Natural Processes Dominate theme. With strong encouragement from local governments, and HOAs, as well as consultation with GMUG staff, WUI areas were determined appropriate to include in the San Juan Mountains Wilderness Bill.

**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 RFP 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;
- Areas that have special characteristics that make them unsuitable for mineral development or extractive activities should not be open to mineral entry or new surface disturbances. Examples of such areas include Naturita Canyon, which has unique and fragile riparian habitat; areas underlying irreplaceable cultural or historic resources such as the Matterhorn Mill; and previously mined areas that have had extensive clean-up and mitigation efforts completed. There should be a theme that allows for a recommended withdrawal from 1) entry, appropriation, and disposal under the public land laws; 2) location, entry, and patent under the mining laws; and 3) operation of the mineral leasing, mineral materials, and geothermal leasing laws;
- Potential special areas that have wilderness characteristics, fragile landscapes, and/or essential habitat that 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, or 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. San Miguel County will continue our active participation in the forest plan revision process.

San Miguel County Board of Commissioners  
Kris Holstrom, Chair