



## COLORADO

### BOARD OF COUNTY COMMISSIONERS

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May 20, 2019

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

RE: Grand Mesa, Uncompahgre and Gunnison National Forests - Preliminary Draft Revised Land Management Plan

Dear Forest Plan Revision Team:

Thank you for the opportunity to comment on the Preliminary Draft Revised Land Management Plan (“Plan”) for the Grand Mesa, Uncompahgre and Gunnison National Forests (“GMUG”). The Mesa County Board of County Commissioners (“Board”) appreciates the cooperative relationship Mesa County has with the United States Forest Service (“USFS”). The Board offers the following comments on the preliminary draft Plan:

#### **Plan Features:**

The Plan includes several features that will allow greater administrative flexibility throughout the lifetime of the Plan and a greater ability for the GMUG to respond to changing conditions, technology and user needs over the next 30 years. The Board applauds this approach, supports these specific features and advocates for their inclusion in the final Plan.

- Management Approaches are delineated in the Plan, but are optional and may be changed administratively. (pg. 4)<sup>1</sup>
- Suitability criteria are inclusive rather than exclusive. In other words, projects or activities may occur in an area unless specifically identified as unsuitable. If the Plan is silent with respect to the suitability of a project, it is assumed to be suitable. (pg. 3)

#### **General Socioeconomics:**

1. **FW-DC-SCEC-01** (pg. 8) – This desired condition states that the GMUG will provide forest goods and services. However, it does not state that the GMUG will be actively managed to provide those goods and services, at levels sufficient to sustain local businesses, at levels commensurate with past provisions, or otherwise. The Board advocates for language that recognizes the USFS’s active role in providing those goods and services and makes a commitment to do so.

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<sup>1</sup> All page number citations refer to the page numbers of the “Grand Mesa, Uncompahgre, and Gunnison National Forests - Preliminary Draft Revised Land Management Plan” released April 2019 to cooperating agencies only, and not to the public.

2. **FW-DC-PART-02** (pg. 8) – Lease and permit holders are not included in the list of partnerships and coordination that will be prioritized. In the interest of citizens and businesses that hold leases or permits on the GMUG, the Board would like to see them included, so that the informal coordination that the GMUG currently practices with lease/permit holders will be formalized in the Plan.
3. **FW-DC-AQ-05** (pg. 9) – The Plan identifies air-quality preservation in Class I Wilderness Areas as a priority and specifies that visibility be set on a path towards natural conditions. The Board is concerned that air quality management for the West Elk Wilderness (a Class I Area) has the potential to impact and restrict agricultural activities, including ditch burning, tilling, harvesting, and other activities that produce incidental particulate air matter. Although these activities take place primarily on private land, much of the water and water infrastructure used to support the agricultural activity is on GMUG land and is therefore subject to USFS approvals for construction, maintenance and repair. The Board recommends the inclusion of language that specifically addresses and exempts normal and historical agricultural activities from consideration.
4. **FW-GDL-AQ-11** (pg. 10) – The Plan identifies air-quality preservation in Class I Wilderness Areas and specifically references oil and gas projects as items of concerns with regard to critical pollutant loads. The Board is concerned that air-quality management for the West Elk Wilderness (a Class I area) has the potential to preclude oil and gas development in the North Fork Valley areas, and to restrict development in other nearby areas such as the Collbran Valley.
5. **FW-OBJ-ENMI-171** (pg. 38) – The Plan proposes to revise oil and gas leasing within three (3) years. The Board supports the goal of completing the revision as quickly as possible, to provide regulatory and operational certainty to oil and gas operators and to encourage investment in local energy resources.
6. **Ongoing Monitoring** (pg. 63) – The plan proposes a regular and comprehensive monitoring program to track performance and evaluate management prescriptions. This monitoring includes items of great interest to the Board, including public use and benefit of the forest, and the harvesting of forest products. However, there does not appear to be an inclusion of grazing performance and provision in the monitoring plan. The Board strongly believes that existing grazing permit holders be considered in this process and that grazing operations on the GMUG be allowed to continue. In addition, the Board would like to have an opportunity to contribute data to the biannual monitoring efforts, specifically concerning economic activity such as tourism trends and tax receipts for forest-dependent businesses.

#### **Access & Management:**

1. **FW-OBJ-TEV-16** (pg. 12) – This objective stipulates that “climate refugia” will be identified and monitored. The Board is not in support of additional land management designations that bring about additional restrictions and redundant regulation at the expense of multiple uses on the GMUG. Existing management plans and designations are adequate to provide functional equivalency (e.g. Wilderness Areas, Roadless Areas).

#### **Water Quality & Water Development Comments:**

1. **FW-STND-RMGD-34** (pg. 15) – The Board is not in support of the riparian management framework which identifies a protective zone extending across the entire “inner gorge” of perennial and intermittent streams. In many cases (e.g. recently-glaciated valleys, mature floodplains) the “inner gorge” as defined could extend for large distances from the stream, far

more extensive than the typical one hundred (100) to two hundred (200) foot protective buffers typically used for stream protection. This blanket application could have the effect of curtailing most or all surface-disturbing activities in large portions of the GMUG (see next comment).

2. **FW-STND-RMGD-35** (pg. 17) – The restriction on all activities that do not maintain or improve long-term stream health within the riparian management zone could preclude large numbers of economically-important activities, including water diversions, grazing management, road construction, timber harvest and types of multiple uses, which the GMUG is statutorily obligated to allow. At a minimum, the Board suggests that the restriction should be limited to those activities that demonstrably harm water quality in ongoing and significant ways, not isolated or sporadic ways.
3. **FW-DC-WTR-131** (pg. 32) – The Board appreciates and approves of the USFS’s commitment to work with stakeholders to provide water supplies to surrounding communities. Given the water quality challenges created by the natural soil conditions in our region, local water suppliers and utilities are equally concerned about the protection of water quality as they are about water supply. The Board suggests amended language to highlight the role that stakeholders have in water quality issues, as well as supply concerns.

#### **Wildlife & Biological Concerns:**

1. **FW-GDL-SPEC-83** (pg. 25) – This guideline suggests that no disruptive activities should be authorized in big game severe or critical winter range or in production areas. The language is not clear as to whether the restriction applies only to the winter use of the areas, or to the use of these areas generally. In addition, the blanket restriction does not allow for a more nuanced, project-specific consideration of impacts and potential minimization/mitigation measures. In general, the Board is not in support of management prescriptions that apply universal restrictions on development, with no opportunity to consider mitigating factors.
2. **FW-GDL-SPEC-84** (pg. 26) – This guideline suggests that “30-100% of a sub-watershed should provide wildlife security habitat.” It is unclear what this means, how it would be measured, or what the practical outcome would be. However, the Board is concerned at any management guideline that proposes to place up to 100% of a given watershed under restrictive management that curtails multiple uses on the GMUG, and requests additional clarification on this item.
3. **FW-GDL-SPEC-85** (pg. 26) – This guideline suggests that no heavy equipment should be allowed to operate within 1.6 miles of boreal toad breeding habitat, except under snow-covered or frozen conditions. The Board is concerned that this amounts to a de facto ban on all construction in these areas, since heavy equipment operation is generally not feasible in winter on the GMUG. For example, this guideline would effectively preclude oil and gas development within 1.6 miles of these breeding ponds. It would also preclude water developments and other resource improvement activities conducted by grazing permittees that require heavy equipment. The Board is not in support of a management policy that would so drastically limit potential activities on the forest, in the absence of more information about the number and extent of these breeding ponds.

#### **Recreation:**

1. **Travel Management** – The Board recognizes that travel management is not a part of this Plan revision. However, the Board does wish to re-emphasize the continued commitment to providing public access to the GMUG, and is not in support of management goals or targets that would lead to additional route closures at a later time.

2. **Motorized Recreation** – The Board is aware of some conflicts between All-Terrain Vehicle (“ATV”) users and Utility Task Vehicle (“UTV”) users. ATV trails have been developed and designated for vehicles of fifty inch (50”) width, but UTVs represent a new vehicle category that is intermediate between full-size and ATV, typically fifty-four to seventy-two inches (54-72”) wide. There is no specific designation for these vehicles, and although they are nominally limited to jeep roads currently, there are consistent reports that the UTVs use ATV trails, damaging the trails and negatively affecting users and resources in the process. The UTV vehicle category should be addressed in the Plan revision, either by explicitly including them in the full-size vehicle category or by creating a new vehicle category for them.

**Timber:**

1. **Suitable Timber Areas** (pg. 175) – The Board supports the USFS’s proposal to increase the suitable timber acreage on the GMUG, in recognition of modern harvesting techniques and new technology.
2. **Salvage vs Green Wood Timber Sales** (pg. 178) – The Board supports the USFS’s proposal to prioritize salvage timber sales in the initial years of the plan. Beetle-kill lodgepole and spruce degrade within five to seven years, and lose their timber value. It is not clear from the analysis, however, whether the projected salvage sale (Table 25) of between one thousand (1,000) and four thousand (4,000) acres per year include the majority of the harvestable salvage timber on the GMUG. The Board advocates that all salvage timber in suitable locations should be available for sale, while taking into consideration the supply needs of local timber processors. However, a five-year plan of predictable large volume salvage timber sales would help provide business certainty for the forest products businesses in the region.

Thank you for your consideration of the above comments concerning this very important matter.

Sincerely,



Rose Pugliese, Chair  
Board of County Commissioners



Scott McInnis  
Commissioner



John Justman  
Commissioner

cc: Frank Whidden, County Administrator  
Patrick Coleman, County Attorney  
Peter Baier, Administrator of Operations/ Public Works