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BOARD OF COUNTY COMMISSIONERS

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July 23, 2019

United States Forest Service
Grand Mesa, Uncompahgre, and Gunnison National Forests
Attn: Jerry Krueger, Acting Forest Supervisor
Via Email: gmugforestplan@fs.fed.us

**RE: Working Draft of the Revised Land Management Plan, dated June, 2019
Grand Mesa, Uncompahgre, and Gunnison National Forests**

Dear Forest Planning Team,

Thank you for the opportunity to comment on the Working Draft of the Forest Plan Revision (“the Draft Plan”). Ouray County has participated throughout the plan update process as a Cooperating Agency, and the Board of County Commissioners has submitted several comment letters throughout the process. Recently, we were able to participate in or review the recordings of recent on-line webinars, as well as attend the Open House held in Ridgway on July 17, 2019, in addition to thoroughly reviewing the Draft Plan documents. We also bring to the process our perspectives gained by directly observing existing conditions on the forest lands located in Ouray County; and also by receiving comments and observations from constituents at our BOCC meetings. Further, one of our Commissioners serves on the State of Colorado Forest Health Advisory Council, and knowledge gained from that forum further informs our comments. We attempt to distill all of these points of knowledge into the comments that follow.

Because this Draft Plan represents the first comprehensive planning update for the GMUG in over 30 years, and further, because the Draft Plan has been developed utilizing the 2012 planning Rule, we consider the Draft Plan a very important document that will provide forest wide direction for the next several decades. Many underlying assumptions regarding future climate conditions are rapidly changing. Just during the period in which the Draft Plan has been developed, we have observed both extreme drought coupled with megafires; followed immediately by record-setting winter precipitation and associated extreme avalanche conditions and avalanche debris flow volumes not experienced in recorded history¹. Therefore, where future conditions are likely to be extremely variable, we welcome the underlying principles of adaptive management, as directed by the 2012 planning rule, which are expressed throughout the Draft Plan.

The economies within Ouray County depend to a large extent on good management of the Forest Service Lands within the County. It is our intention, in submitting these comments, to help identify the correct source of management direction for the GMUG, and to help specify activities and output levels that may be appropriate going into the future, based on the issues identified at this time during the plans’ development.

1. SOCIAL AND ECONOMIC ENVIRONMENT

- a. FW-DC-SCEC-01 ; and FW-DC-PART-01, and FW-STND-LSU-12 During the inventory stage of the Plan Revision, Assessment phase, we commented on the need for local jurisdictions to plan for viable communities, where residents find affordable quality housing within their communities. Where small tract exchanges are available, and make sense, we encourage the sort of partnerships that may allow for in-fill development, particularly for housing opportunities. We

¹ See: *The Colorado Sun*, July 15, 2019 “Acres of destruction left by Colorado’s historic avalanche season are also delivering climate change evidence” at: <https://coloradosun.com/2019/07/15/climate-research-avalanche-tree-rings>

would like to see specific mention of this type of partnership as an Objective within the Social and Economic Environment section of the Working Draft.²

2. FOREST HEALTH, TIMBER MANAGEMENT, and MANAGEMENT AREAS

- a. FW-GDL-FFM-02 Active management of Forest Lands should be encouraged, where possible, and particularly where buildout within the Wildland-urban Interface is likely to occur. This is partly because it is far more cost effective and efficient to perform management prior to anticipated build-out. Further, principles described in recent new silvicultural prescriptions, such as the awkward term “Clumpy-Groupy” should be embraced going forward, in areas where thinning of forest stands is prescribed, in order to preserve species diversity.
- b. MA-DC-WLDN-14 Continued management should not be abandoned simply because of desire for natural processes everywhere. Where wilderness management areas are desired, natural processes may need to be the dominant management tool. However, where active management is appropriate and allowable, active management should be encouraged. One trend, to encourage only natural processes in most if not all areas, is worrisome, and begs us to ask the question: Why designate special management areas such as Areas to be Analyzed as Wilderness, if there is sufficient interest to manage many area as if it were already Congressionally Designated Wilderness?
- c. MA 1.2 (RECWLD) The current Draft Plan leaves many of these potential management area designations without mention. Only those areas currently designated within the Colorado Outdoor Recreation and Economy Act (the “CORE Act”) are mentioned within the Draft Plan, and we continue to fully support the inclusion of those areas for potential Wilderness designation by Congress. We previously submitted comments regarding Recommended Wilderness. We incorporate those comments herein, and re-attach those comments as Exhibit 2, below.³
- d. MA 2.1 (SIA) Given the trend towards eliminating management on these recommended wilderness areas, and the need we observe to conduct management in some of these areas, we would support looking at these areas previously commented on as Special Interest Areas, rather than Recommended Wilderness.
- e. MA 1.1 (WLDN) and MAP – MANAGEMENT AREAS The actual boundaries of Areas to be Analyzed as Wilderness, under the Colorado Outdoor Recreation and Economy Act, and any successors, should conform to the maps designated in that Act. The boundaries identified on the map of Management Areas may have slight discrepancies between the Act and the Working Draft.
- f. FW-GDL-SCNY-04 Ouray County encompasses many areas designated as Very High regarding the Scenic Integrity Objective. Many of these have received previous comments by this BOCC as recommended wilderness, and we re-incorporated those previous comments by reference here, and expand on them with the qualification above describing a potential alternative designation as Special Interest Area.
- g. Appendix H. TIMBER Timber harvesting technology has improved over the years. With machinery and techniques allowed through devices such as timber forwarders, helicopter-based logging, tracked chippers, together with modern silvicultural prescriptions and an increasing talent pool for high-angle operators, we suggest that some slopes greater than a 30% slope should be considered as lands on which timber harvest should be available without causing irreversible damage. Therefore, this Working Draft should eschew the stated strict adherence to the Land Management Planning Handbook FSH 1909.12 Chapter 60, in order to consider Timber Production and especially Timber Salvage on steeper slopes.

3. FIRE and FUELS MANAGEMENT

² See, February 1, 2018 letter from Forest Supervisor Scott Armentrout, on this topic (attached here as Exhibit 1).

³ See Appendix 2, Ouray County BOCC comments dated September 5, 2018.

- a. FW-GDL-FFM-02 Prescribed fire is a valuable tool in moving towards resilient and healthy ecosystems and sustainable fuel loading. The County welcomes the inclusion of this guideline within the Draft Plan, and supports the utilization of prescribed fires, where appropriate conditions have been achieved to safely utilize this method of fuels management.
- b. FIRE MANAGEMENT AREAS, and ENHANCEMENT EMPHASIS AREA, and FW-GDL-FFM-05 In addition to those guidelines stated in the Draft Plan, the County has observed the recent success of utilizing new authorities to conduct cross-boundary treatments, between Forest Service Lands and private and state lands. The Master Agreement between the State of Colorado and the United States forest service, authorizing implementation of the Good Neighbor Authorities, and implemented locally through the Colorado State Forest Service, should be referenced within this section as a Guideline for what is working, and should be expanded and improved for future desirable conditions.

4. RECREATION - SUMMER RECREATION

- a. MAP – Desired Summer Recreation Settings (ROS), Designated Trail Management Overlay – Management Areas
 - i. The forest lands immediately surrounding the City of Ouray are suitable for a Designated Trail Management Overlay designation. While the Working Draft does designate the Bear Creek National Recreation Trail as one of these proposed areas, this should be expanded to recognize the predominance of hiking trails surrounding the City of Ouray.
- b. Travel Management – OHV
 - i. We have observed an increased impact on the high-alpine area transportation system by increasing numbers of ATV and UHV small-frame motorized vehicles. Please see attached photos taken by Commissioner Tisdell in August 2017, at Wright’s Lake in Yankee Boy Basin as an example of resource damage caused by ATV tracks entering this alpine lake. Also note in these photos, a vehicle barrier had been installed, and has been removed.⁴
- c. FW-STND-REC-217: Unsustainable use levels: We observe increasing trends towards the need for developed sites in certain areas that trend towards high use recreation. In order to prevent further degradation of these currently dispersed sites, we encourage the designation of potential Developed Sites. We have observed trends towards unsustainable use levels at both the Blue Lakes Trailhead and certain areas in Ironton Park. These two areas in particular should be flagged now for consideration in the Working Draft.

5. RECREATION - WINTER RECREATION

- a. *Recreation, Standards: FW-STND-REC-216:* This focuses on summertime recreation. In many places, winter recreation occurs for at least as many months as summer recreation. Therefore, descriptions of motorized use should include all forms of Over-the-snow motorized recreation.
- b. FW-GDL-LSU-05 The County appreciates that cooperation and consultation is a guideline for Access issues. Where wintertime access is needed in unmaintained roads, the County expresses a preference for predominantly over-the-snow vehicles where possible. To the degree that plowing is required for agricultural and/or residential access, the County would like to with the United States Forest Service to ensure that recreational access on to forest lands is maintained.
- c. MAP – DESIRED WINTER RECREATION SETTINGS (ROS) The Proposed Action, Desired Winter ROS, appears to expand on current travel management plans. While the County realizes that the Draft Plan does not purport to modify those travel management plans at this time, the map in the Working Draft does not appear to conform to existing plans, particularly along the Hwy 550 corridor south of the City of Ouray. Recreation Settings should emphasize existing Primitive; Semi-Primitive Non-motorized and Semi-Primitive Motorized as those designations may currently exist.

⁴ See Appendix 1, photos.

6. WATER

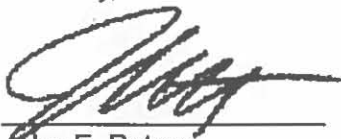
- a. FW-DC-WTR-02 The County appreciates and approves of the Forest Service's commitment to work with stakeholders to provide water supplies to surrounding communities and water users.
- b. FW-STND-WTR-05, and FW-STAND-LSU-02, AND FW-DC-TSTN-01 Over-the-snow transportation should be expressed as a preference for wintertime uses in snow-covered areas, in order to preserve winter hydrologic conditions and prevent early run-off and sediment transportation.

7. CHAPTER 4 – MONITORING - Alpine Rangers and Law Enforcement

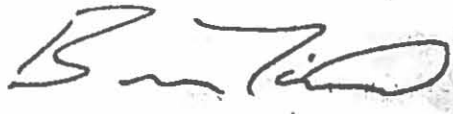
- a. Impacts like those described above highlight the need for additional law enforcement efforts as a component of the monitoring process. This should include identifying opportunities for additional cooperation between local jurisdiction law enforcement and USFS law enforcement. While recreational rangers, and alpine ranger programs have been a good measure towards reduction of asset degradation, the visitor numbers and change in use towards ATV and UHV-type vehicles, and simply the increased numbers of summertime visitors, indicates a need for additional capacity to encourage compliance with and enforce rules that prevent resource damage.
- b. The Draft Plan proposes a regular and comprehensive monitoring program to track performance and evaluate management prescriptions. This monitoring includes items of great interest to the County, including public use and benefit of the forest, and the provision of forest goods. The County would like to have an opportunity to contribute data to the biannual monitoring efforts, specifically concerning economic activity, including tourism trends.

Thank you for your time in considering Ouray County's comments.

Sincerely,



John E. Peters
Chair



Ben Tisdell
Vice Chair



Don Batchelder
Commissioner Member

Appendix 1: Resource Damage Photos





DON BATCHELDER
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BOARD OF COUNTY COMMISSIONERS

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September 5, 2018

Samantha Staley
Grand Mesa Uncompahgre and Gunnison National Forest All Units
2250 South Main Street, Delta, CO, 81416
via email to: samanthajstaley@fs.fed.us

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

Dear Responsible GMUG officials,

Thank you for this opportunity to provide comments on the Draft Wilderness Evaluation dated August 6, 2018.

While the period to review the Draft Wilderness Evaluation and provide these comments has only been open for 30 days, and we have been consumed with many other issues during this time that compete for our small county's attention, one of our Board members was able to attend the webinar held on August 7, as well as review the published materials, and draft these comments on behalf of the County. Commissioner Tisdell has additionally become familiar with many of the areas studied in the Draft Evaluation through years of backpacking and hiking through the existing Wilderness areas as well as through those areas evaluated here. These comments are based on this on-the-ground experience and a thorough review of the published evaluation documents, as well as a thorough understanding of current county-based concerns including watershed and forest health matters; wildfire matters; existing and potential water infrastructure; road issues including OHV use and winter travel; weed control; evolving private property use and ownership patterns; and many other matters relating to the US Forest Service lands that we become familiar with during the normal course of conducting County business. In addition, the County has received testimony from Ouray County citizens and businesses regarding the merits of many of the parcels in the Draft Wilderness Evaluation.

We have previously commented on the draft Forest Assessments; Wilderness Inventory; and Wilderness Criteria, the draft scoping materials; and are pleased to provide these comments on draft Wilderness Evaluation.

In producing today's comments, we have tried to keep in mind the purpose and organization of the evaluation materials and the framing questions posed by GMUG during the webinar and in the draft evaluations, as summarized here:

- I. Are the narratives clear, and do they reflect the considerations outlined in the criteria?
- II. Does each narrative include all relevant information available?
- III. If you have personal experience with a particular area / polygon evaluated in the materials, what are those experiences?

Ouray County's comments are as follows, with reference to particular polygon identifications per the draft evaluations.

Our comments will be contained to the following polygons in the draft evaluation:

Polygon Number	Polygon Name	Acres	Draft Evaluation Rating	Ouray County Rating	Ouray County Concerns
O5	Whitehouse Mountain	24,314	High	High	Conform Boundaries to SJMWB
O6	Leopard Creek	611	High	High	
O1-NW	Cimarron Ridge	16,919	Moderate	Moderate	
O1-SW	Owl Creek	7,094	Moderate	Low	Water Infrastructure
O1-E	Turret Ridge	6,156	High	High	
O2	Baldy Mountain	2,973	Moderate	Moderate	
O3	Amphitheatre	8,598	Moderate	Low; High	Break into two Areas for analysis
O4	Hayden Mountain	9,018	Moderate	Low	County Roads, Active Mining,
O7	Dave Wood	9,264	Moderate	Moderate	
OG1	Little Cimarron	26,163	Moderate	Moderate	
G27	Nellie Creek / Matterhorn	15,920	Moderate	High	Western isolated polygon should be High

Discussion of Ratings and Evaluation of Wilderness Characteristics

Polygon O5 Whitehouse Mountain

The Whitehouse Mountain polygon in the Draft Evaluation includes boundaries that have been modified in the current version of the San Juan Mountains Wilderness Bill. The current evaluation should reflect the newly revised boundaries within the Bill. We concur and strongly support the finding within the Draft Evaluation that this area should be ranked as High wilderness potential.

Polygon O6 Leopard Creek

While the overall acreage of this polygon is too small (less than 5,000 acres), this evaluation area's contiguity to the existing Mount Sneffels Wilderness Area, along with the other criteria found in the Draft Evaluation, should justify its rating as High.

Polygon O1-NW Cimarron Ridge

We would like to call attention to the noted existing water developments within this evaluation area. While the purpose of this Draft Evaluation phase of the Forest Plan Revision is only one of several steps toward possible eventual designation by Congress, we believe that it is important to highlight any and all water infrastructure at this point that would necessarily have to be taken out of any future steps towards actual designation. In this particular polygon, the Draft Evaluation points out the existing water infrastructure in the Southern portion. Where this would be called out in any eventual designation, and its other characteristics are analyzed, we would concur with the ranking of Moderate found in the Draft Evaluation.

Polygon O1-SW Owl Creek

In addition to the comments for Polygon O1-NW that concern existing water infrastructure, we believe that it is important to also highlight potential water infrastructure. There are potential water storage opportunities within this evaluation area, and due to that potential, we would suggest lowering the assessment for this polygon to a Low or No characteristic.

Polygon O1-E Turret Ridge

We concur with the rating contained in the Draft Evaluation.

Polygon O2 Baldy Mountain

The acreage of this evaluation area is less than the desired minimum size of 5,000 acres. In addition, existing grazing allotments exist within the area. We would suggest reducing the evaluation for this area to a designation of Low.

Polygon O3 Amphitheatre

This evaluation should be split into two separate evaluation areas. On the West side of the existing polygon, in addition to the noted uses, there is active rockfall mitigation to protect Highway 550. The rating for this West side should be reduced to Low. On the East side of the existing polygon, we agree that there is a very high degree of wilderness characteristics across all evaluation criteria.

Polygon O4 Hayden Mountain

This polygon exhibits many characteristics similar to Polygon N3, which earned a No Wilderness Characteristics rating. It contains or is adjacent to active mining, significant historic mining, designated county roads, water infrastructure, an active hydroelectricity facility, adjacent residential subdivision, and proximity to highway 550 on the eastern portion of this evaluation area. However, the portions of this polygon higher in elevation demonstrate high values of all wilderness characteristics. Therefore, we would suggest splitting both Polygons O4 (Hayden Mountain) and N3 (Bridal Veil) into two additional polygons and then going through a further evaluation. If that is done, we would expect that the higher elevation portions of both O4 and N3 might achieve Moderate, while the lower portions of each might also earn a Low or No.

In addition to these comments regarding Polygon 4, the same comments relevant to the boundaries of the San Juan Mountains Wilderness Bill ("the Bill") made above in reference to Polygon O5 are repeated here. The boundaries in the Bill have been updated, and the Draft Evaluation should reflect the boundaries in the current Bill. In line with our comments in the paragraph above, we feel that the current evaluation rating found in the Draft Evaluation materials is appropriate to be applied to this Southwestern portion of Polygon O4.

Polygon O7 Dave Wood / Spring Creek

We concur with the draft evaluation analysis for this polygon.

Polygon OG1 Little Cimarron

Does this area contain treatment areas designated under SPEADMR?

Polygon G27 Nellie Creek / Matterhorn

The furthest West section of this evaluation area should be rated as High rather than Moderate. It contains upper tier Roadless designation, was ranked as a High in the 2007 recommendations, and its other merits described in the Draft Evaluation should earn this isolated section of this polygon a High while the other non-contiguous sections of this polygon should remain as Moderate.

Ouray County wishes to thank you for the opportunity to comment on these vital elements of the Forest Plan Revision process.

Sincerely,



Don Batchelder
BOCC, Chair

Appendix 3 - February 1, 2018 Letter regarding Tract Changes



United States
Department of
Agriculture

Forest
Service

Grand Mesa, Uncompahgre and
Gunnison National Forests

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cc: Boce

File Code: 1920; 5400
Date: February 1, 2018

Ben Tisdell
County Commissioner
Ouray County
PO Box C
Ouray, CO 81427

Dear Mr. Tisdell:

We received the following comments from Ouray County as part of our Forest Plan Revision Assessment phase:

“Ouray County has worked with willing private land owners, land trusts and other agencies to help facilitate conservation easements or purchase of development rights. We would appreciate being able to partner on developing strategies and relationships to accomplish conservation easements that benefit the missions of the USFS GMUG and the County’s continued work on this front.”

“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, in exchange for assistance in 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.”

Because we continually consider landownership adjustment projects within Ouray County, such as sales, purchases and exchanges, we are willing to meet with County representatives at your convenience to develop adjustment strategies to meet our common goals. Please contact Corey Wong, Public Service Staff Officer, at 970-874-6668 or cwong@fs.fed.us. Thank you.

Sincerely,

SCOTT G. ARMENTROUT
Forest Supervisor

cc: Tammy Randall-Parker

