

Town of Crested Butte

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-National Trust for Historic Preservation's 2008 Dozen Distinctive Destinations Award Recipient-

-A National Historic District-

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

November 1st, 2021

GMUG Forest Planning Team

As a cooperating agency, the Town of Crested Butte (Town) appreciates the extensive planning and community engagement leading to this draft of the GMUG Forest Plan. We appreciate the opportunity to participate in the process as a cooperating agency given the impact of the surrounding National Forest lands on our community's health, wellbeing, economy, and lifestyle. The Gunnison National Forest includes the watershed that provides our drinking supply. Ensuring the quality of our drinking water is one of our highest priorities. We also own and manage adjacent land and trails, which we wish to manage in a manner consistent with USFS practices.

Having reviewed the four alternatives presented by the Forest Service, we respectfully submit the following comments. Referenced desired conditions, management approaches and vision do not necessarily encompass the entirety of the Town's opinions on the plan. Omissions do not express support or opposition to specific points in the plan. However, we have tried to be as complete as possible in our submission based on the Planning Team's request to do so. Lastly, many management objectives overlap, but we have done our best to categorize them.

Summary of Priorities: Having reviewed previous letters, community input, and the draft LMP and EIS volumes I & II, we have identified this list of our top priorities.

1. Protection of Town watershed and supply as well as water quality valley wide.
2. Implementation of recommendations laid out in the Gunnison Public Lands Initiative (GPLI).
3. Prioritizing ecosystem services and natural process over commodity extraction.
4. Greater investment in recreation management and infrastructure supporting sustainable use.
5. Utilizing good forestry management practices around timber harvesting.

Forest Plan Vision, Roles and Contributions: The Vision, Roles and Contributions section offers good insight into the goals of the document. Considering the GMUG "contains more water-related special uses and serves as critical headwaters," we would like to see that as the initial statement under Ecosystem Services and Multiple Uses. Water is the lifeblood of the GMUG and should be at the forefront of the plan.

Partnerships and Coordination: The Town greatly appreciates the focus on Partnership and Coordination as identified in FW-DC-PART-01. We strongly encourage the USFS to continue to make all possible efforts to engage Ute tribes indigenous to these lands, both in further development of the plan as well as implementation.

The Town is highly supportive of added language showing that management activities will continue to be considered with context to neighboring lands. We hope to engage in the opportunity to provide shared stewardship along our many trails and open space parcels adjacent to Forest Service Lands as stated under the management objectives of PART. Along these lines, a high priority for the Town is management of invasive species. Since management across jurisdictional boundaries is the only way to effectively mitigate invasive species, we are eager to coordinate projects under FW-OBJ-IVSP-02, 03. We also look forward to opportunities to collaborate on acquiring funding.

Climate, Habitat Connectivity, Species Diversity & Protection: Every year the impact of climate change, including less snow, earlier runoffs, and drier summers, on our community grows. We do not want additional and unnecessary human caused stressors such as fire, clear cutting, and degradation of watersheds added to the mix. Consequently we wish to see FW-DC-SCEC-01 separated into two desired conditions with “The provision of sustainable forest services, including clean air and water supplies and healthy fish and wildlife populations, contributes to the social and economic well-being of local communities” being a standalone desired condition. The above should be first and foremost, with a secondary desired condition defining commodities, particularly timber and mineral extraction.

Table 1 shows that a large majority of the forest areas surrounding Crested Butte and our watershed are of the high fire severity rating. We hope the USFS will consider any timber harvest pending approval to target severe wildfire mitigation first and economic feasibility second.

In addition to maintaining natural ecosystem functioning, we are supportive of mitigating the effects of climate change by expanding habitat connectivity, defined under FW-DC-ECO-05. This point is also stated in additional language inserted into FW-STND-RMGD-08 and FW-GDL-SPEC-06, which we support.

While we do not currently have a large area of occupied Lynx habitat under dense usage, there are areas to the NE and SW of the Gunnison National Forest which have habitats favorable to lynx. We would like to see these areas managed with the protections listed for both Lynx and Snowshoe Hare. FW-STND-SPEC-35b states that vegetation management activities could occur in up to 7% of mapped lynx habitat. We would like to see stronger language justifying vegetation management relating to Table 6, Alternative D that includes wildfire protections and allows timber production only if it achieves larger goals surrounding lynx protection and vegetation management.

FW-OBJ-AQTC-03 adds language to identify critical areas to conservation of critical species and habitat. We support this language and hope the Forest Service will support research identifying the most critical areas well before the five-year mark.

Town would like to see areas analyzed for Wilderness as defined in GPLI (alternative D) inserted into the Draft Record of Decision as previous comments submitted by Town have highlighted. The community driven, scientific, and collaborative process was undertaken as requested by Forest Service personnel and Town would like to see it implemented.

The Town would also like to see a more substantial analysis of carbon sequestration potential in the DEIS I & II to help guide various opportunities in the Forest Plan. This has been requested by regional partners through the joint letter to Chad Stewart from July 16th and we support this request.

Watershed Protection, Aquatic Ecosystems, Riparian Area Management: The entirety of the Town’s primary watershed is 15,600 acres along Kebler Pass, with the vast majority being located on Forest Service Land. Town supports all protections of the Coal Creek watershed that can be defined under FW-DC-WTR-01, 02, 03. We feel strongly that the inclusion of Coal Creek in the priority watershed designation will help reach the desired conditions listed above more effectively.

We request that the USFS prioritize the Slate River watershed. The Town has conditional water rights on the Slate River. While we are not currently using them, we intend to develop these rights to create redundancy in the municipal water supply. Additionally, we have facilitated years of management planning and stewardship with the Slate River Working Group to better manage this river corridor. Beyond the Town’s needs, the watershed is critical to the larger Gunnison Valley.

The East River should also be considered for priority watershed protection. In terms of habitat, the Upper East River Watershed is one of the only known watersheds with breeding grounds for Boreal Toad that does not contain the

chytrid fungus. As the understanding of management of the Boreal Toad grows, we recommend you prioritize efforts to maintain this population. This watershed is again identified in Table 7 under Target Species, further warranting the addition of the East River into the priority watersheds list. As more research becomes available, Town would like to see additional measures implemented to protect Boreal Toad habitat.

While we strongly support the Oh-Be-Joyful priority watershed protection designation and the addition of Coal Creek, Slate River, and the East River; given the importance of water to the ecosystems, we would like to see a more expansive approach. We encourage the USFS to increase its investment in watershed management so that it has the resources to do what it needs to do for all watersheds, such as Daisy Creek, Copper Creek, West Elk Creek, Perry Creek, Sardine Creek, Silver Creek, Gold Creek (anthracite range & fossil ridge), Ruby Anthracite Creek, Ant Creek, Pass and Cliff Creeks, Castle Creek, Carbon Creek, Ohio Creek, Farris Creek, Cement Creek, East, Middle & West Brush Creeks, Crystal Creek, Lottis Creek, Taylor River and many others.

We also request that under objective FW-OBJ-WTR-04 an increase in the percentage of trending watersheds toward improved watershed condition be implemented. Over the life of the plan the majority of sub watersheds should be improved. In FW-OBJ-RMGD-06 we would like to have more than 2500 acres or 15 miles of streambank improvements in each 10-year period after plan approval. Town would like to see an increase in frequency in management actions identified in FW-OBJ-INFR-03. With watershed restoration being at the forefront of the plan revisions overall vision, we'd hope to see one action per year completed in vulnerable/poor/impaired watersheds as defined. Collectively these changes would greatly improve ecosystem health.

Lastly, the Town is supportive of the designation of Oh-Be-Joyful creek & tributaries, Copper Creek & tributaries, and Anthracite Creek & tributaries under the Wild & Scenic River Eligibility program. While these are our top priorities, there are several others we would also like to see added, as previously indicated, including the Slate River from its headwaters at Yule Pass to the confluence parcel just north of Town, Daisy Creek from its headwaters to the Slate River confluence, East River from its headwaters above Emerald Lake to the Cold Spring Ranch, all three branches of Brush Creek in their entirety, Cement Creek, and Ant Creek.

Education and Interpretive Programs: Town supports opportunities to expand educational and interpretive programs as listed in FW-DC-EDU-01. Providing educational institutions the opportunity to obtain permits to conduct reasonable activities and research will continue to drive local economic prosperity and will help build a stewardship ethic for the GMUG. We also support addition of language eliminating barriers of entry to qualified educational and interpretive institutions to utilize Forest lands for programming.

Recreation and Infrastructure: As we continue to see requests for increased access to river areas, the Town is supportive of language added to FW-DC-AQTC-02 to increase instream flows to support river recreation. We support the addition of language into FW-GDL-AQTC-07 to allow wood removal to protect recreational boater safety, but only as reasonably necessary.

Town supports added language in FW-GDL-SPEC-57 to concentrate stream crossings and road lengths in conservation watershed networks. This, in addition to improvements defined under FW-STND-AQTC-05 touches on many improvements for our waterways while maintaining recreational access.

The Town is in support of added language under Land and Special Uses allowing conveyance of administrative lands to agencies in support of affordable housing.

The Town is very concerned about recent requests to access Forest Service inholdings in areas that would permanently scar the visual landscape. Prohibition of these permit issuances are nearly all justifiable under Desired Conditions, Objectives and Guidelines of the Scenery (SCNY) section. Additionally, private roads across forest service land are increasingly restricting access for the public. The preference of Town is that these permissions are not granted at all but if they are granted, we ask that the permits improve public, non-vehicular access, not limit it. These public benefits are supported in FW-STND-LSU-03 and should be dutifully enforced. If permits are issued under FW-GDL-LSU-04, the Town wishes to see similar language relating to public access as in 03.

The Town supports the final management approach listed under LSU/Access/Management Approaches to ensure express easements are conveyed to the United States to ensure situations cannot arise where private

landowners are closing publicly owned and maintained roadways. This is further supported in FW-STND-LSU-09 as written regarding boundaries and should apply to access along roadways as well. More defined standards, guidance and management objectives are requested regarding these continually evolving issues on public lands.

Dust suppression along roadways has become an increasing issue in our surrounding areas and implementing programs in a broader sense than solely special events would be beneficial to the plan. We ask that language surrounding FW-GDL-AQ-04 to be expanded beyond just recreational events and that active management objectives are defined.

The Town would like to see FW-GDL-REC-12 moved into the standard category to prevent user created motorized routes from expanding further.

Town is supportive of language added in FW-GDL-SPEC-16 relating to long-term population and herd distribution. Concentration of recreational amenities in specified stack-looped systems, supported under FW-DC-TRLS-01& MA-GDL-EMRC-04, can fulfill recreational desires while also preserving large swaths of habitat in remote areas. We prefer locating stack looped systems as close to urban interfaces as possible. This is also supported under the Management Approaches to Recreation. As these areas are developed, we continue to support language and associated improvements to travel and transportation infrastructure defined in FW-DC-TSTN-01. These transport systems are critical to preventing user created routes, both motorized and non-motorized.

Language added to FW-DC-REC-01 is supported by the Town as we continue to await regional guidance on emerging recreation technologies, such as e-bikes and would prefer additional detail in the forest plan. We recommend that management of e-bikes be based upon class. These clarifications will help us improve management on our adjoining land and trail systems. We would like to see this guidance issued in the definitions section of the Forest Plan revision.

The Town would like to see a shorter timeline and higher quantity of unauthorized motorized travel route elimination as defined under FW-OBJ-REC-06. These are created at a much faster rate than two each decade, and we find that the currently defined standard would remain at a net addition to unauthorized motorized routes over the decade.

The transition in the North Valley drainages to designated camping has helped immensely with dispersed camping impacts as defined in FW-STND-REC-07 and is supported by the Town. However, limiting dispersed camping in our area may concentrate impacts elsewhere, such as south of Highway 50. We encourage the USFS to implement infrastructure improvements needed to manage those impacts. We also support the addition of language surrounding consideration of concerns voiced from local communities. Should fees for camping be implemented, Town would like to see language in the Forest Plan to ensure the fees are retained locally for infrastructure and management projects. We would also like to see supportive language for fees and other sources of available funding directed towards access programs for underserved communities.

The Town is highly supportive of FW-GDL-REC-13 and would like to see it implemented quickly. Dated techniques such as cat holing are no longer sustainable in highly utilized recreation areas. Self-contained packable waste systems can and should be implemented on a large scale in the Gunnison National Forest and the GMUG in its entirety. It would be reasonable to make the above a standard, instead of a guideline.

Lastly, the Town is glad to see added language under Recreation Emphasis Corridors and MA-DC-EMREC-01. We hope to see these implementations in areas where recreation may be driven from one location to drainages surrounding Crested Butte. Addressing infrastructure needs and improving US Forest Service staff presence are the most common requests we receive from our community.

Fire and Fuels Management: Town is supportive of additional language maintaining natural fire regimes with ensuring the safety of firefighters and the public. Fire has been a high concern of Town in recent years and continues to grow with increases in tree mortality regionally. The Town supports treatments of high-risk wildfire areas. Any timber harvest should be driven by fire management and not by commercial production needs.

The Town also supports language added in management approaches to provide mitigation in the high-risk "Upper Taylor Geographic Area" defined in the GMUG Watershed Vulnerability Assessment. We would like to see similar language added to protect Coal Creek, Slate and East River watersheds.

Rangelands, Forage, Grazing, Fencing: Improved grazing standards, such as those developed by the National Resources Conservation Service (NRCS), have significantly improved ecosystem health. We encourage sustainable grazing standards that support achieving objectives in FW-DC-RNG-01 and FW-GDL-RNG-09. The standards in FW-STND-RNG-08 could also be more clearly defined.

The Town is supportive of FW-OBJ-RNG-04 as well and would like to see an addition to an existing or new objective stating that opportunities to implement and maintain wildlife friendly fence in partnership with local ranchers will be utilized to improve habitat connectivity for ungulates and other species.

Wildlife friendly fencing, including marking for reduction of bird collision near Gunnison Sage Grouse Lek sites should be utilized and maintained where reasonable. Town is very supportive of FW-GDL-SPEC-74 to reduce fencing on Forest and adjacent lands overall. Monitoring of necessary fences by USFS personnel should be associated with this guideline. Improvements and monitoring should follow Colorado Parks & Wildlife's guidelines laid out in "Fencing with Wildlife in Mind" or the most up to date regional research available.

Timber: The Town is opposed to economically driven increases in timber harvest. Harvests should focus on fire management to restore or protect habitat. Additionally, we oppose the change in the forest plan that dramatically increases the amount of forest available for timber production. We would like to see the amount of forest available for harvest dramatically reduced. Restoration through seedling restock defined under FW-STND-TMBR-02 should require the seeding to commence upon project completion, not within five years. The Town requests that FW-STND-TMBR-07 be modified to include a more robust process involving public input for any clearcutting operation. Priority should be given to forest health and vegetation management over revenue generation for the USFS and contractors.

Energy and Minerals: Energy and Mineral operations largely do not function in harmony with the main priorities of the Forest Plan. The Town is aware that as part of modern societies, these operations are necessary to maintain our normalized existence. Energy and mineral extraction companies have the resources to mitigate their operations while still maintaining substantial profit margins. The Town does not support added language under "Leasables-Energy Mineral Resources" stating that existing leases are unaffected by the revised plan. While it is understood that the USFS may not be able to retroactively alter in-place leases, The Town requests that the USFS use all legally available tools to ensure energy and mineral extraction operations operate at the highest standards.

The Town does not support FW-OBJ-ENMI-06 and wishes to see Colorado roadless areas exempted from oil and gas leasing, therefore eliminating the need for this standard. Allowing this sort of extraction is contradictory to MA-STND-WLDF-02 as well as many other standards that Town supports. We would also like to see FW-STND-ENMI-09 moved to the top of the standards so Forest Plan Direction guides any potential leases.

The Town would also like to see additional language surrounding cooperating agency engagement and required public process for Energy and Mineral extraction leases. We also ask for priority standards surrounding renewable energy resources as defined under additional direction.

Finally, Town supports softening of language surrounding renewable energy under FW-STND-LSU-05 could be deemed appropriate by Town under the correct conditions and location if projects arose where continuity onto public lands would make the project economically feasible.

Alternatives as Presented: The Town supports alternative D, with the modifications identified in this letter. In general, the Town does not support Alternatives A, B or C in their currently proposed form. This sentiment is largely supported by local partners and was well detailed in the joint letter sent to Forest Supervisor Chad Stewart on July 16th, 2021, from the Gunnison, Hinsdale, Ouray and San Miguel Boards of County Commissioners. Lack of appropriate and long-term climate data analysis surrounding carbon sequestration and water storage capacity is paramount to formulating the appropriate alternative to guide the direction of our forest for the coming decades.

While alternative D is the most supported, there are important improvements to be made before the Draft Record of Decision is issued. The large increase in areas designated as suitable for timber production interferes with the responsible management of the other highly inter-connected natural systems of the forest. The inclusion of over 46,000

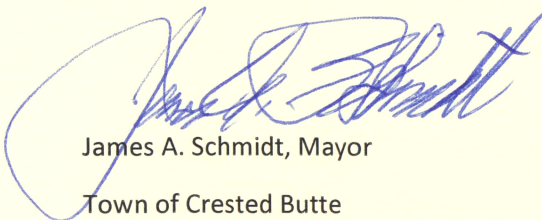
acres of Gunnison Sage-grouse habitat continues to show the inflated and inappropriate timber suitability of all the alternatives. We ask that at the very least, this acreage be removed.

Town would also like to see active management objectives surrounding the potential for infrastructure needs should recreational access points be altered. Concerns have been brought up about concentration of winter users in drainages north of Crested Butte, which are already crowded, due to elimination potential of other OSV opportunities in the Southern and Eastern parts of the GMUG as stated on page 353 of EIS volume I. As stated in previous comment letters, the Sustainable Tourism and Outdoor Recreation Committee is an invaluable resource in these conversations, and we hope they will continue to be utilized.

Lastly, we would like to emphasize the importance of incorporating GPLI's recommendations into the Final Plan. The Town sees the incredible value of GPLI, in which many diverse stakeholders in our community came together to develop a shared vision for our public lands. GPLI has consistently engaged with the GMUG as part of the Forest Plan Revision process and has submitted several comments during the planning process, starting in November 2017 during the Assessment phase, in June 2018 for Scoping, for both the Wilderness Inventory and Evaluation processes in January and September 2018, and during the comment period for the 2019 GMUG Working Draft. While each comment focused on a distinct aspect of the revision process, a common theme ran through all of them: the desire of the GPLI to see the proposal reflected to the greatest extent possible in the revised GMUG Forest Plan. A revised forest plan that includes the broadly supported special management area and wilderness recommendations developed by the GPLI will best serve the communities in Gunnison County and the broader public. The Town, and our partners, greatly urge that GPLI's wilderness and special management area recommendations are incorporated into the Final Plan to the greatest possible extent.

Overall, the work and collaboration that has gone into the Forest Plan Revision Process has been greatly appreciated by the Town of Crested Butte. We hope to see the comments above and those submitted by our regional partners integrated into the Draft Record of Decision in great detail, especially those presented by GPLI, which are widely supported in the Gunnison Valley and beyond. Previous comments over the last several years have maintained consistency in supporting this plan. We look forward to viewing the Draft Record of Decision and offering support once reasonable adjustments have been made to bring the plan into alignment with regional priorities. Thank you again for the collaboration, partnership, and opportunity to provide feedback on the Draft Plan.

Regards,



James A. Schmidt, Mayor

Town of Crested Butte