

DOUBLE RL RANCH

Via Online Submittal

Grand Mesa, Uncompahgre and
Gunnison National Forest
2250 South Main Street
Delta, Colorado 81416

*Re: Draft Forest Plan and Draft Environmental Impact Statement/Comments from the
Double RL Ranch*

To Whom It May Concern:

The following comments on the Draft Forest Plan and Draft Environmental Impact Statement for the Grand Mesa, Uncompahgre and Gunnison National Forests are submitted on behalf of the Double RL Ranch. The Double RL Ranch is comprised of more than 17,000 acres in Ouray and San Miguel Counties, adjacent to the Uncompahgre National Forest and the Mount Sneffels Wilderness Area.

Double RL is generally supportive of Alternative B and the designation of additional Wilderness Areas as contemplated in that Alternative. On a more specific level, Double RL provides the following comments:

1. *Fire and Fuels Management.* To help promote Objective FW-OBJ-FFM-02, more opportunities should be provided for public/private partnerships to encourage private landowners to take proactive fire management actions, including thinning and creation of buffers. Additional timber harvesting should be encouraged to further reduce fire risk, especially in areas of significant beetle kill or other infestation.
2. *Watersheds and Water Resources.* Double RL owns certain water rights and water rights infrastructure that originate within USFS boundaries, some of which are adjacent to newly proposed Wilderness boundaries. Regardless of which alternative is ultimately pursued, the Forest Plan should recognize existing privately owned water rights and related infrastructure (headgates, ditch easements, etc.) which originate or pass through USFS lands in accordance with FLPMA. As Double RL has made clear to congressional representatives, any new Wilderness boundaries should avoid existing private water rights facilities and recognize the rights of private water rights owners to continue to operate, maintain, repair and replace water rights infrastructure. In addition, Management Approaches should be implemented to limit new recreational opportunities in areas adjacent to or that cross important watersheds, especially those situated at the top of drainage basins. The USFS should include a mechanism to compensate water rights owners for damage caused to water right structures by recreational usage (i.e. mountain bike trails eroding ditch bank, ATV ditch crossings sluffing into ditch structure, etc.). This comment is applicable to Desired Condition FW-DC-WTR-02.
3. *Energy and Mineral Resources.* While oil and gas leasing availability is outside the scope of this Forest Plan Revision, in any future environmental analysis, the USFS

should identify non-mineral resource conditions that warrant future lease stipulations/license conditions. No Surface Occupancy leasing stipulations should be applied to protect lands with high value non-mineral resources, such as areas with high value scenic resources (including areas within the view corridors of such areas), water resources, endangered and protected wildlife resources, historical resources and specially designated areas. This will assist with achieving Desired Condition FW-DC-ENMI-01. Any chosen alternative should also include FW-STND-ENMI-09 (all new leasable mineral actions shall include applicable surface use and occupancy stipulations).

4. *Rangelands, Forage and Grazing and Invasive Species.* To achieve Desired Condition FW-DC-RNG-01, the revised Forest Plan should encourage additional grazing allotments within USFS lands and make more lands available for such purposes. In addition, a greater emphasis should be placed on controlling invasive species within grazing allotments, including by providing resources to beneficiaries of grazing allotments to control invasive species on such lands. This comment is applicable to FW-OBJ-IVSP-02 and FW-STND-IVSP-04.

5. *Recreation and Trails.* FW-DC-REC-02 requires recreation to be managed to achieve a sustainable balance with “other resources.” Water resources should be included in the list of “other resources.” In addition, increased recreational usage of the Forest System over the last couple of years has resulted in more instances of trespass and damage to private property and creates a greater risk for wildfire. To achieve FW-DC-REC-02, any new recreational opportunities within the Forest System such as construction of additional trails for mountain biking should be heavily scrutinized. New trails and new recreational opportunities should not be approved in areas near existing grazing allotments (due to stress on livestock), near productive wildlife habitat (including elk and deer migration corridors), near wildlife birthing grounds (possible link between increased recreation and abandoned offspring), or near designated Wilderness areas. Before any new recreational opportunities within the Forest System are approved, the USFS must also ensure adequate public facilities (parking, roadways, etc.) are in place and capable of being maintained.

Sincerely,



Oakley Kelly, Ranch Manager

11/19/2021

Date