

November 25, 2021

Chad Stewart
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2250 South Main St.
Delta, CO 81416
Submitted via <https://cara.ecosystem-management.org/Public//CommentInput?Project=51806>

Dear Mr. Stewart and GMUG Planning Team,

Thank you for the opportunity to provide feedback on the Grand Mesa, Uncompahgre, and Gunnison National Forest Draft Revised Land Management Plan (the “Draft Plan”) and its companion document the Draft Environmental Impact Statement (“DEIS”). The San Miguel, Ouray and Gunnison County Boards of County Commissioners (BOCC) appreciate the additional time and innovative opportunities made available to cooperating agencies and the general public to participate in the Forest Plan revision. We continue to appreciate your active collaboration with GMUG counties to date.

At this time we consider Alternative D the most acceptable alternative, although substantial changes are needed. We submit these substantive comments collectively, as an express desire to see further changes to the Draft Plan and the DEIS. We believe the changes needed are substantial enough to make the release of a subsequent Draft appropriate. The following comments are submitted in response to the Draft Plan and DEIS and are in addition to our collective comments submitted previously on July 16, 2021, which are attached. Each of our counties will also be submitting specific comments.

1. Climate Change Analysis

The GMUG Planning staff stated that it does not have adequate tools to include carbon sequestration as a site specific analysis. Although the USDA took a proactive approach to incorporate climate change considerations in the 2012 Planning Rule regulations and the Forest Service Manual and Guidebook provides guidance, we understand that there is not a prescriptive process in order to do so. The rapid increase of climate change connected impacts, requires all of us to more proactively determine the most effective actions that can be implemented in order to adapt and support the resiliency of our natural resources.

The Draft Plan’s final Desired Conditions & Objectives, Standards, Guidelines and Suitability sections must all include consideration for how projects and activities will either improve or degrade the resiliency of landscapes and ecosystems to adapt to the changing climate. Projects or activities should only be approved with measures in place that will decrease the potential impacts of climate change by promoting native and resilient ecosystems, providing more carbon sinks, reducing existing forest stressors and collaborating with partners to monitor and respond to climate related changes in forest and landscape health.

The Rio Grande National Forest initiated a science-management collaborative approach to address the 2012 planning rule climate change concerns at the Forest Plan scale BEFORE the released of their Final Plan and EIS. The process was deemed a success.¹ The exponentially increasing impacts from a rapidly changing climate are of concern to the State of Colorado, local governments, our communities, our residents and visitors alike. The *GMUG National Forest REVISED DRAFT Forest Assessments: Carbon March 2018 Report* states that "the GMUG contains the most sequestered carbon of any National Forest, therefore any actions that shift the carbon sequestration capacity of the GMUG will have significant impacts on the U.S. and the planet. Those shifts could directly impact the budgets and resources of local governments. We would like to request that the GMUG initiate a "Climate Change Action Plan" that can be used to comprehensively and adequately incorporate climate change considerations into all sections of the Final Plan and EIS.

2. Suitable Timber, Wildfire Mitigation and Forest Health

We continue to oppose the proposed substantial increase in Suitable Timber across the GMUG. Climate change induced wildfire occurrence and severity is placing our communities and critical infrastructure at increasing risk. The wildfire mitigation projects that are most needed do not need a Suitable Timber designation for consideration. We would like to reiterate our request that the GMUG prioritize wildfire mitigation projects that reduce the risk to communities, critical infrastructure and water resources.

We continue to support a responsible timber production program that contributes to Forestwide desired conditions and multiple use goals, such as providing mosaics of habitats for wildlife species, managing fuels, and contributing to the economic sustainability of local communities. This must be balanced with other forest uses. Suitable Timber designations were a major obstacle to designating lands for uses other than timber production during the previous decade of collaborative community discussions which resulted in the CORE Act and GPLI proposal. Local users and stakeholders determined that existing uses, wildlife habitat and natural resources protected and enhanced by the citizen initiated proposals were desired. Most, if not all, of these areas had a low probability for timber production and yet representatives from a single interest industry were able to effectively delay these broadly supported designations from moving forward. Suitable Timber should not be used as a tool for preventing multi-use.

All vegetation management must include the enhancement or protections of ecological systems, wildlife and the recreation opportunities that surrounding communities economically depend on. While technology is improving access to steeper slopes, not all steep slopes are suitable for the new technology or for treatment. Vegetation management on steep slopes should only be considered if the natural resources can be protected to enhance the resiliency of existing and future forests.

Finally, we are committed to supporting the USFS's implementation of prescribed burning that is coordinated with local, state and federal forest health and wildfire mitigation priorities.

¹ <https://www.fs.usda.gov/rmrs/projects/rio-grande-national-forest-climate-change-plan-revision-workshop>

3. Wildlife and Recreation

We support the prioritization of wildlife habitat core and corridor areas through Wildlife Management Areas, additional Wilderness and Colorado Roadless areas and recognize that the protection of wildlife habitat needs to happen across jurisdictions. At the same time, we are all experiencing increased demand for recreational opportunities. We would like to see the Draft Plan more adequately identify areas where increased recreational opportunities can be responsibly prioritized.

The Recreation Emphasis Areas that appear to follow roadways, seem to only consider designated camping opportunities, are not adequate for trail planning and should be renamed. We would like for the Final EIS to identify areas on the forest suitable for “recreation emphasis or focus areas”. We have been hearing concerns from trail advocates, especially non-motorized, for years that trails are consistently denied due to impacts to other uses, especially wildlife. Regional trail advocates need to know where various levels of trail development, including looped, stacked/looped systems and long distance connections are suitable in order address the growing demand, **need to disburse impacts** and to focus planning with their limited resources.

4. Socioeconomic Analysis and Management of Increasing Recreation Demands

According to a report commissioned by the Outdoor Alliance ² “human powered outdoor recreation is a major economic engine on the GMUG contributing \$392 million annually, \$112 million in wages and 5802 jobs. The Draft Plan and preferred alternative must offer a more comprehensive socioeconomic analysis which recognizes the benefits to our communities from the outdoor recreation economy. Our forests must be managed for multiple uses and many if not all of our communities are facing increasing demands for a wide spectrum of recreational opportunities. Human-powered outdoor recreation is a major economic engine on the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) and should be recognized as such in the Plan’s socioeconomic analysis.

Between outdoor recreation, ecosystems services and wildlife related tourism, which all have quantifiable values, it is safe to assume that these uses of the GMUG far outweigh the socioeconomic benefits of the timber industry and yet the Draft Plan continues to only measure the socioeconomic benefits of that single industry, and appears to prioritize timber production over all other uses. We would like to suggest that if recreational uses need an “opportunity spectrum” or ROS to identify appropriate uses, that timber should also be regulated by a “Timber Opportunity Spectrum” or TOS.

Again, we recognize that timber harvest techniques have come a long way from the destructive methods of the past and we support the implementation of responsible timber production. We also recognize that we need Montrose Forest Products and its contractors and subsidiaries in order to support our increasing wildfire mitigation needs. At the same time, we would like to see

² <https://www.outdooralliance.org/blog/2018/11/28/gmug-economic-reports-press-release>

a stronger balance of the other potentially more valuable uses and resources of the forest. Recreational visitor numbers have seen an upward trend for many decades, and for the past 2 years have seen a 40% to 50% sustained increase. These contributions, and corresponding adequate management responses, must be presented in further versions of the Draft Plan and DEIS.

5. CORE Act & GPLI

We appreciate the inclusion of the Wilderness and Special Management Area designations of the CORE Act and proposed Gunnison Public Lands Initiative (GPLI) and ask that they be carried forward into the Final EIS.

6. Fens

We support the recommendations of Colorado Natural Heritage Program to include a section specific to the identification, inventory and protection of fens and their integral systems in the Forest Plan. Examples of Fen specific language can be found in other Forest Plans including the Rio Grande National Forest.

7. Rangelands, Forage & Grazing

Objectives in the RFG section should include the intent of managing grazing in an adaptive way that maintains resilient landscapes and protects critical habitat especially for Gunnison sage grouse. The management of grazing in and around the Gunnison National Forest is a model of how grazing can be managed in a way that protects GuSG habitat.

8. Invasive Species Management

Management approaches and funding opportunities should include coordination with County Weed Management Departments to implement a more effective cross jurisdictional approach.

9. Drone Management

We support the continued USFS management of drones to prevent wildlife and all other user group impacts.

Summary

We must continue to work together across all GMUG counties and communities to find common ground as we look ahead to the challenges we will face managing our public lands. Human demands are increasing and must be managed to allow multiple uses while preventing user created impacts. Simultaneously, the impacts from a changing climate are threatening natural

resources as well as our communities and infrastructure. The difficult balance of public land users, protection and enhancement of the resiliency of natural resources and the growing need to mitigate the threats from climate change to our communities and critical infrastructure will require all of us to work together to adapt our needs and practices as we manage landscapes across jurisdictions. While a new Forest Plan is well overdue, we see the need for careful and thorough consideration of the broad range of comments submitted. We believe that the number of substantive changes needed should justify the release of another Draft Plan before the Final Plan and EIS is released. Most importantly, a new plan must incorporate comprehensive consideration of climate change to guide and understand the implications of management decisions into the future.

Sincerely,

Gunnison County Board of Commissioners

/ s / Jonathan Houck

/ s / Roland Mason

/ s / Liz Smith

Ouray County Board of Commissioners

/ s / Jake Niece

/ s / Lynn Padgett

/ s / Ben Tisdell

San Miguel County Board of Commissioners

/ s / Hilary Cooper

/ s / Kris Holstrom

/ s / Lance Waring