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Organization: Town of Crested Butte

Title:

Comments: Preliminary Draft Plan Comments--Town of Crested Butte

Sam,

I'd like to submit the attached comments on the preliminary draft forest plan on behalf of the Town of Crested Butte. We are very appreciative of the opportunity to participate in this process as a cooperating agency and we are looking forward to staying engaged. Please let me know if you have any clarifying questions on our comments.

Thank you,

Mel Yemma

Open Space/Creative District Coordinator

Town of Crested Butte

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Thank you for sharing the preliminary draft Forest Plan (Draft Plan) with agencies, municipalities and counties participating in this important process. The Town of Crested Butte (Town) appreciates your outreach efforts and the value that you place on input from cooperators. The summary of the plan, management area snapshots and the interactive story map were helpful tools to better understand the Draft Plan and we appreciate the opportunity to provide feedback.

The Town has several direct interests in our surrounding National Forest lands, from our watershed and drinking water supply to being neighbors with the National Forest with many of the open space properties and trails that we own or hold conservation easements on. Our Town's wellbeing and economy is dependent on the health of our backyard, including the vast outdoor recreation opportunities that the surrounding Gunnison National Forest provides. While we intend to send more thorough comments from our Town Council on the Draft Plan once it is released to the public, we hope that you will value our staff input on the following aspects of the preliminary Draft Plan:

Recreation Infrastructure and Management: Similar to what we commented on at the beginning of this planning process, the Town has continued to witness many impacts of increased recreation in the northern end of the Gunnison Valley on our public lands. The Town appreciates the emphasis in the Draft Plan on the forest-wide direction to plan for recreation's increasing role in the region by "ensuring that a given area's recreation setting is maintained, despite other management activities and increasing recreational use, and by ensuring that scenic areas remain scenic" (Summary of the Preliminary Draft Forest Plan). Additionally, we are generally supportive of the inclusion of Crested Butte as a "High-Use Recreation Emphasis Area". The Town would like to ask that you continue to engage in discussions with all neighboring land managers, municipalities, user groups, and other relevant stakeholders about enhanced recreation management, as the Gunnison Ranger District is currently

doing with the Gunnison County "Sustainable Tourism and Outdoor Recreation Committee". We ask that when it comes to planning for the "High-Use Recreation Emphasis Area" that the management actions and guidelines reached will take into account all possible impacts on our Town's citizens, neighbors and visitors and consider local, collaborative solutions for certain recreation management approaches. The Town has enjoyed working with the federal agencies on finding local solutions when it comes to recreation management on trails, rivers, and open space parcels that we manage. Overall, the Town would like to continue to stay apprised and be engaged in discussions on any enhanced recreation management occurring in the north end of the Gunnison Valley.

**Wilderness Designations and the Gunnison Public Lands Initiative:** The Town recently wrote a letter of support for the CORE act and appreciates the inclusion of eligible wilderness areas as a component of that proposal in the San Juan region. However, the Town is disappointed that no other areas are recommended for wilderness designation and that the Draft Plan does not contain any acknowledgement of recommended land management areas from the Gunnison Public Lands Initiative (GPLI). The Town has consistently supported the recommendations made by the GPLI in our Forest Plan comments, including most recently, the Wilderness Evaluation Report. The GPLI is a collaborative, community-driven, science-based process, and by being inclusive of ten diverse stakeholders, we believe that the GPLI initial proposal has found a balance between recreational, ecological, and economic values while achieving broad support from our local community. This community-driven effort has resulted in specific wilderness and special management area recommendations, and the Town was surprised to see no mention of these recommendations included in the Draft Plan. Similar to our request for recreation management, the Town is incredibly supportive of local stakeholder discussions and initiatives as they are representative of our diverse community needs. The Town requests that you consider including the efforts and recommendations of the GPLI in the updated Forest Plan.

**Climate Change:** As a mountain town dependent on snowpack, the Town has a direct interest in climate change. Our Town Council recently set a 5-year goal of significantly reducing our Greenhouse Gas Emissions and is focusing on the impacts of climate change as one of our highest priorities. Climate change must be incorporated as a higher priority in the Forest Plan. For example, Plans must provide for ecological sustainability by "including plan components to maintain or restore structure, function, composition, and connectivity, taking into account ... [s]ystem drivers, including ... climate change" (36 CFR 219.8(a)(1)(iv)). Climate change is also incorporated into the concept of multiple use, and must be considered in developing plan components for integrated resource management (36 CFR 219.10(a)(8)). From the Draft Plan, it is unclear to what extent the GMUG is addressing this issue with Forest Plan direction to avoid, minimize, and mitigate climate change sources and impacts, but it appears to not be as high of a priority in the Draft Plan as our Town considers it to be.

**Timber Production:** In addition to our concerns about the priority of climate change impacts in the Draft Plan, we have serious concerns about the impacts that doubling the amount of lands available for timber production would have on watershed health, recreation, wildlife, and other resources that are essential to the Town. In addition, we ask that the Forest Service consider how timber production relates to climate change directions in the planning rule. The planning rule defines "ecosystem services" as the benefits that ecosystems provide to humans, including the

"long term storage of carbon" and "climate regulation" (36 C.F.R. [sect] 219.19.). Forest Plans must provide for ecosystem services by including "plan components, including standards or guidelines ... to provide for ecosystem services ... in the plan area"(36 C.F.R. [sect] 219.10(a).) Because the planning rule identifies carbon sequestration as an ecosystem service, the Forest Service must include plan components that address carbon sequestration. We do not see that in the Draft Plan. While we understand that the GMUG is a multiple use forest, we would like to see more emphasis on the ecosystem services and climate change mitigation that forests provide, rather than doubling the amount of land available for timber production.

**Watershed Health:** As we mentioned in our original comments at the start of this process, the ongoing protection of Coal Creek and the Slate River is a high priority for the Town, as both of these rivers serve the Town's municipal drinking water system. The Town appreciates the desired condition included in the Draft Plan for watershed conditions, which is to maintain or improve the integrity of public water supplies. Similar to our concerns about climate change, we understand that we are trending towards a future with less water and more people, and the health and supply of our watershed is critical to the Town. These rivers transcend boundaries

between federal lands, private lands, historic ranches, and our Town. The Town asks for further clarification in the Draft Plan about how the GMUG plans to ensure that our watershed health is improved in the future and how to manage for an increasing likelihood of drought conditions. The Town also asks that the Gunnison Ranger District consider coordinating with the Upper Gunnison River Water Conservancy District's current watershed management planning process to ensure a local and collaborative plan for the future of our watersheds in our critical headwaters environment.

Overall, we hope that you value this feedback on behalf of the Town of Crested Butte. As a cooperating agency, the Town appreciates the opportunity to provide these initial comments to provide feedback on the Draft Plan, however, we plan to provide more thorough comments on the Draft Plan when it is released to the public. Thank you again for your outreach and helpful tools to understand the Draft Plan and for providing us with the opportunity to comment. We are looking forward to continuing to be engaged in this important process for our community.