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Title:

Comments: Town of Crested Butte Comments on Working Draft

Good morning Forest Planning Team,

I'd like submit the attached comment letter on the Working Draft of the Forest Plan on behalf of the Town of Crested Butte. Thank you for providing such helpful resources to review the Working Draft and for your valuing input from both cooperators and our community.

Thanks again,

Mel Yemma

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Town of Crested Butte

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Dear Sam Staley and the GMUG Forest Planning Team,

Thank you for encouraging public input and providing such helpful resources and webinars on the Working Draft of the Forest Plan (Working Draft). The Town of Crested Butte (Town) appreciates your outreach efforts and the value that you place on input from the Town as a cooperating agency and neighboring community.

The Town and our citizens have several direct interests in our surrounding National Forest lands, from our watershed and drinking water supply, to being neighbors with the National Forest where many of the Town's conservation easements on open space and trails are located. Our Town's wellbeing and economy are dependent on the health of our backyard, including the vast outdoor recreation opportunities and natural resources that the surrounding Gunnison National Forest provides. After thoroughly reviewing the Working Draft, we hope that you will consider our feedback on the following aspects:

**Overall Management Direction:** Direction, both forest-wide and for Management Areas, is one of the most important parts of a forest plan. The Working Draft contains some good aspects, but overall there is significant room for improvement to ensure that implementation achieves the plan's goals. Generally speaking, the Working Draft provides veryweak, and in some cases non-existent, direction for protection of important resources. There is a dearth of mandatory standards and/ or guidelines to ensure that desired conditions are achieved. While the Town understands the desire of the Forest Service to retain flexibility, this does not mean that the plan cannot contain sideboards. The Working Draft does not provide sufficient plan components for protecting these important natural resources. The Town requests that additional standards and mandatory components be added, including but not limited to those we raise in this comment letter below.

**Recreation Infrastructure and Management:** The Town is appreciative of the GMUG's efforts to address the issue

of unacceptable ecological impacts resulting from recreation use and unsustainably high use levels (as expressed in STND-REG06). 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 Working Draft on the forest-wide direction to plan for recreation's increasing role in the region, and we are supportive of the following proposed standards and objectives in the Working Draft:

FW-S1ND-REG06: "Designate or otherwise manage (i.e., harden for more long-term, concentrated use; temporarily close and rehabilitate; institute a permit system; prohibit camping via closure, etc.) dispersed campsites when use levels result in unacceptable ecological impacts."

FW-S1ND-REG07: "Institute responsive management actions in day-use areas when unacceptable ecological impacts and/ or unsustainable use levels occur."

MA-OBJ-I-IREG02: "Within 5 years of plan approval, accomplish management actions in at least 10 noticeably degraded dispersed recreation areas (rated as an Overall Impact Rating of 6 to 8 using the National Minimum Recreation Site Monitoring Protocol), as detailed in Recreation FW-S1ND[shy]REG06. The standard REG06 will be applied to determine when thresholds have been reached and more active management is needed. Priority areas include: Crested Butte, Taylor Park, and existing campsites within the riparian management zone."

The Town is additionally supportive of the inclusion of specific areas near Crested Butte as a "High-Use Recreation Emphasis Areas" and we appreciate that the GMUG is attempting to address the issue of recreation resource damage. However, there are no standards included for this management area, so it is unclear whether the desired conditions will be met. 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 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.

Land 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, we are 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 (GPU). The Town has consistently supported the recommendations made by the GPU in our Forest Plan comments. The GPU is a collaborative, community-driven, science-based process. Because it includes ten diverse stakeholders, we believe that the GPU revised proposal strikes 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 which unfortunately are not reflected in the Working Draft. The Town is incredibly supportive of local stakeholder discussions and initiatives as they represent our diverse community needs. Please incorporate GPU's wilderness and special management area recommendations into the revised Plan to the greatest possible extent.

As far as other special land designations, the Town requests further information about Special Interest Areas (SIAs), specifically for the Mt. Emmons Iron Fen SIA and for the new Gunnison Research SIA. The Working Draft contains no information about the different SIAs, nor does it contain standards or guidelines for protecting the values for which the areas are proposed to be designated. Please include specific standards and guidelines for protecting the values for which this and other SIAs are proposed to be designated. Lastly, the Town is supportive of MA-STND-RNA-04: "To protect the Gothic Natural Area, camping and off[shy]route travel is prohibited within the RNA." The Rocky Mountain Biological Laboratory (RMBL) in Gothic attracts one of the largest annual migrations of field scientists to the Crested Butte region and the Town is supportive of protecting this critical area

in Gothic that provides RMBL with crucial data about our local ecosystems.

**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 revised 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.S(a)(l)(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)). Climate change direction is lacking in the Working Draft. The Town reiterates the importance of this issue and asks that direction for both avoiding and responding to climate change be incorporated.

**Timber:** While the Town understands that the GMUG is a multiple use forest and the forest health benefits that sustainable timber production provides, we have significant concerns about the impacts on watershed health, recreation, wildlife, and other resources that are essential to the Town that will arise from an increase in the acreage of lands available for timber production. Intact forests are immensely beneficial. Forest ecosystems provide fresh clean water and air, habitat for wildlife, forage for livestock grazing, and a multitude of recreational and research opportunities. Emphasizing commercial timber production at the expense of these resources is at odds with the Town's expectations for management of the surrounding National Forest lands, and contradicts the Multiple Use and Sustained Yield Act requirement to balance the development of timber with protection of water, recreation, wildlife and other resources.

The Town is also concerned that areas likely to be economically infeasible to harvest are included in the suitable timber base. The National Forest Management Act requires the USFS to consider economic factors in determining the suitability of lands for timber production. If land is unlikely to be harvestable during the foreseeable future because it is "un-economical to harvest due to low volume per acre or long haul distance" (Working Plan pg. 175), it should not be suitable for timber production. We are also concerned that land likely to be inoperable due to slopes of 40 percent or greater will be considered suitable. It is very doubtful that such areas could be cut commercially and not violate NFMA's provision of assurance that harvest can be conducted "without causing irreversible damage to soil, slope, or other watershed conditions" (16 U.S.C. 1604 and 36 CFR 219.11(a)(l)(iv)). Distorting the timber suitability determination would lead to an unsustainable timber program that would impact the other critical forest values.

STND-TMBR-02, which states that clear-cuts in aspen stands could be 100 acres, is also problematic. Crested Butte is surrounded by some of the most iconic aspen forests in the world, attracting locals and visitors alike, and providing outstanding wildlife habitat and recreation opportunities. Generally, the Planning Rule limits clear-cuts in Colorado national forests to 40 acres. Under 36 CFR 219.11(d)(4), exceptions are allowed, but they must meet the following criteria: "Plan standards may allow for openings larger than those specified in paragraph ( d ) ( 4 ) of this section to be cut in one harvest operation where the responsible official determines that larger harvest openings are necessary to help achieve desired ecological conditions in the plan area. If so, standards for exceptions shall include the particular conditions under which the larger size is permitted and must set a maximum size permitted under those conditions" (Id. at (d)(4)(i)). The Working Draft standard with the exception allowing 100-acre clear-cuts in aspen stands does not state "the particular conditions under which the larger size is permitted" nor does it say what desired condition(s) the large openings would help achieve. Openings larger than 40 acres should be a rare exception, if not prohibited.

**Watershed Health:** As we mentioned in our original comments at the start of this process, the ongoing protection of CDal 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. Large areas are subject to the Town's watershed protection ordinance which is designed to protect the Town's municipal water system. We understand that CDlorado is trending towards a future with less water and more people, and the health and supply of our watershed is critical to the Town's very existence.

The Town agrees with the Working Draft watershed condition, which is to maintain or improve the integrity of public water supplies. We also support the designation of the Oh-Be-Joyful/Slate River watershed as a priority

watershed ((36 CFR 219.7(1)(i)).

The Working Draft initially proposes to establish conservation watershed networks to protect watersheds and sensitive species like trout and boreal toad, but provides no detail on how these networks would be applied and maintained. The Town supports conservation watershed networks, which have "high-quality habitat and functionally intact ecosystems that contribute to and enhance conservation and recovery of specific target species" (DGSPEGSS). However, without more plan components, especially standards, it is hard to see how such networks will be maintained to achieve this desired condition. Standards, i.e., mandatory constraints on management actions and/ or required actions to protect resources, will especially be needed to ensure these networks are maintained. Objectives and guidelines would also likely be helpful in this regard. Lastly, the Town asks that the following aspects of Riparian Management Zones (RMZs) be amended in the revised Plan:

STND-RMGD-09: "To maintain stream thermal cover and prevent windthrow within the riparian management zone, clear-cut harvest shall not occur in riparian management zones." The Town requests that additional restrictions be imposed on logging in RMZs to protect this critical watershed resource.

GDL-RMGD-10: "To reduce the likelihood of sediment input to streams and reduce adverse effects to stream channels and riparian areas, new sand and gravel pit extraction, and/ or placer mining/ extraction, should be located outside of the riparian management zone." The Town asks that this be revised to be a standard rather than a guideline. Mines should never be located in RMZs.

GDL-RMGD-12: "To minimize effects to aquatic resources, refueling activities, equipment maintenance, and storage of fuels and other toxicants should be located outside of riparian management zones." The Town asks that this be revised to a standard. Storage of fuels and other toxic chemicals, and refueling and maintenance of equipment, should never occur in RMZs.

GDL-RMGD-15: "To maintain ecological integrity and support native species (including at-risk species), design projects to avoid ditching, damming, dewatering, or flooding of fens and wetlands." The Town asks that this be revised to a standard.

Wildlife: Ensuring that diverse wildlife species and habitats thrive into the future on our surrounding National Forest lands is an extremely important goal for forest management. The Town is generally supportive of the concept of a Wildlife Management Area (MA3.2), especially one that has "U]arge blocks of diverse habitat [that] are relatively undisturbed by routes" and one where "[h]abitat connectivity is maintained or improved as fragmentation by routes is reduced" (MA-DG WIDF-01). However, the aspirations for protecting wildlife may never be achieved due to the lack of plan components. The one component under the MA besides the above-quoted desired condition would not reduce fragmentation nor increase connectivity. S1ND-WDLF-02 would only prevent new routes if a route density of one mile per square mile was exceeded. Thus, while the Town agrees with a management area that protects wildlife habitat, the lack of details ( only one desired condition and one standard for the entire area), call into question how well wildlife would actually be protected.

MA-S1ND-W1DF-02 states, "[t]o provide security habitat for wildlife species by minimizing impacts associated with roads and trails, there shall be no net gain in system routes, both motorized and non[shy]motorized, where areas are already in exceedance of the 1 mile per square mile limit as calculated within this management area boundary. Within the Flattops Wildlife Management Area on the Gunnison Ranger District, there shall be no new trail development. Exception: this does not apply to administrative routes." To truly protect wildlife, a much lower route density standard will be needed. We request that the standard require that existing densities, where below whatever density standard is adopted, not be increased. As it reads now, it would allow all areas within this management area to have a route density of one mile per square mile.

Also, in regards to protecting big game species, the Town requests that GDL-SPEG17 be made a standard instead of a guideline. GDL-SPEG17 appropriately places restrictions on activities in big game production areas and winter ranges.

Lastly, the Plan creates Management Area 3.1, which integrates the Colorado Roadless Rule's direction into the Working Draft. However, there is only one desired condition and no standards. It is not clear how well almost 197,000 acres of Roadless lands will be protected under the Wildlife Management Area designation where the

two overlap. The Town requests that more plan components be identified for the Wildlife Management Area to ensure Roadless lands are protected, as required by the Colorado Roadless Rule.

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 comments and feedback on the Working Draft. Thank you again for your outreach and helpful tools to understand the Working Draft 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.

Sincerely,

James A. Schmidt

Mayor