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First name: Corrine

Last name: Platt

Organization: Town of Ophir

Title: Mayor

Comments: Dear GMUG Planning Team,

Thank you for this opportunity to submit feedback on the Draft Revised Plan of the Grand Mesa Uncompaghere Gunnison National Forest. The Town of Ophir (Ophir) has been tracking the development of the plan at each stage and commends the Forest Service for the tremendous research, information-gathering effort and public input that has gone into this latest Plan. Ophir's identity and way of life are built upon the Forest Service lands that surround our town. We believe that our clean air, clean water and public health are directly linked to the protection of our public lands. The influence of the Forest Plan on the future of Ophir's health, well-being, economy, climate, and lifestyle cannot be understated.

We would like to provide our support for the comments and recommendations submitted by Sheep Mountain Alliance et al., and reaffirm our commitment to supporting wilderness protections for multiple lands in the GMUG and specifically the Ophir area.

The Town of Ophir appreciates how this process has been open, and that feedback has been solicited throughout. However, Ophir is disappointed to see that there was no meeting worked out with any of the Ute tribes as stated in the Volume I EIS. We believe that it is imperative that prior to the final record of decision being issued that these meetings take place and the various Ute tribes indigenous to these lands have an opportunity to influence the plan. With the exception listed above, it appears that FW-DC-PART-01 has largely been fulfilled in the Forest Plan process and we hope that will continue in the future.

Having reviewed the four alternatives presented by the Forest Service, we respectfully submit the following comments on the draft plan components and priorities. Referenced desired conditions, management approaches and vision do not necessarily encompass the entirety of the Ophir'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.

At this time Ophir cannot support the Draft Revised Plan Preferred Alternative B as presented. The complexities involved in the planning process to accommodate public needs, natural resources and a rapidly changing climate, make the process incredibly challenging. We are concerned that this Draft Revised Plan and Preferred Alternative B do not adequately recognize these complexities. Alternative D is the best alternative for balancing wildlife and recreation, however it still falls short in some areas that affect Ophir specifically and that generally affect all our public health. From the DEIS "Alternative D may result in the greatest economic benefit related to wildlife-related recreation because it proposes the greatest amount of wildlife management areas, recommended wilderness, and special management areas, which would likely benefit wildlife, fishing, and hunting recreation opportunities and associated spending in the local economy..."

Timber

Ophir strongly opposes the substantial increase of suitable timber proposed in this Draft Revised Plan. Every alternative in the draft plan posits a significant increase in suitable timber across the region, which is a designation that interferes with consideration of responsible management of the forests. Ophir believes that GMUG National Forest is much more valuable for conserving biological diversity and recreation than it ever could be for timber production.

Alternatives B and C designate the entirety of Ophir valley as Suitable Timber. Alternative D has significantly less land designated suitable timber, but still has designations on the east side of Ophir Valley that we do not support. The majority of the areas designated suitable are steep slopes that are prone to avalanches and would be

uneconomical to harvest. If future harvesting of timber were to occur on steep slopes it would make avalanche conditions, already an issue of much concern for public safety in our town, much more dangerous. The designation of areas as suitable timber could stand in the way of future protection for land around Ophir that is included in the Colorado Outdoor Recreation and Economy (CORE) Act, legislation that Ophir strongly supports. Ophir is concerned that the designation of suitable lands for timber across the GMUG include large areas that cannot be harvested economically, or in some cases, that cannot be harvested at all during the life of the revised plan. This will lead to artificially inflated calculations for sustained yield limit, projected timber sale quantity (PTSQ), and projected wood sale quality (PWSQ), which in turn misleads the timber industry and the public, as well as present and future Forest Service staff, about how much timber can or should be cut on the GMUG. It could lead to lands with trees actually suitable for timber production being overcut to meet an inflated PTSQ or PWSQ that was based in large part on thousands of acres of lands that cannot be harvested during the life of the plan and likely long afterward.

In addition, this Draft Revised Plan appears to be moving from a reserve model (can it be harvested economically) to resource potential model (does it have trees). This is an interpretation, not a requirement of the 2012 Planning Rule. Per the handbook, the planning committee was not required to analyze slopes over 40% or speculate as to future technological advances for steep slope harvest.

According to Colorado's Office of Economic Development and International Trade, Colorado's outdoor recreation economy generates \$37 billion in consumer spending annually, and contributes 511,000 direct jobs. Those who work in the industry have collectively earned over \$21 billion in wages and salaries, while those who support it have generated \$9 billion in state and local tax revenue.

A series of new economic studies, commissioned by the Outdoor Alliance, measures the economic impact of outdoor recreation in the GMUG. Researchers found that outdoor recreation in the Grand Mesa, Uncompaghere, and Gunnison National Forests generates \$392 million in human powered recreation alone. This number encompasses annual spending on paddling, climbing, hiking, snowsports, and mountain biking that also supports local jobs and attracts both businesses and residents to Colorado.

The sale of timber does not come close to these numbers, while at the same time negatively impacting the beauty of the region and the main reason that people come to recreate and spend much-needed money in Colorado.

#### Recreation Opportunity Spectrum

At this time Ophir cannot support any of the GMUG draft plan Winter ROS Alternatives as presented.

Ophir is strongly committed to non-motorized use in the forestlands that surround the valley. The noise from snowmobile use in our steep valley has tremendous impacts to residents and wildlife. Ophir has a history of quiet recreation. Ophir also has a history of large, dangerous avalanches. Recreational snowmobilers travel through steep, significant avalanche terrain, and not only put themselves at risk, but at times, put themselves directly above other backcountry users on the same slope. The Town of Ophir believes that FW-OBJ-REC should include an objective to initiate Over Snow Vehicle (OSV) planning within a specific timeframe.

All of the alternatives of the Draft Revised Land Management Plan Winter ROS GIS have the east side of Ophir Valley and Forest Road #630 (Ophir Pass), listed as "Roaded Natural". Alternative B additionally has the land north of the pass listed as "Semi-Primitive Motorized". Alternative C has both north and south of Ophir Pass listed as "Semi-Primitive Motorized" which conflicts with Town of Ophir's Source Water Protection Areas as well as proposed CORE Act protections.

Alternative D has a smaller area designated "Semi-Primitive motorized" but still has Ophir pass designated "Roaded Natural". "Roaded Natural" is an inappropriate designation here as Snowmobile traffic cannot safely follow the summer pass road and has not historically done so.

ROS Settings are defined by distance from designated motorized routes and areas. For winter purposes, there aren't any official designated routes in the Ophir area. There is no current travel management plan for over snow

vehicles (OSV). Ophir believes that the designation of areas for winter motorized traffic without this plan in place unduly influences future decision-making by the agency. Especially in light of OBJ-REC-06, which states: "Within 10 years of plan approval, to reinforce semi-primitive non-motorized settings, eliminate at least two unauthorized motorized travel routes." It is Ophir's opinion that if the GMUG is serious about enforcing semi-primitive non-motorized settings, it should close many more than two unauthorized routes in 10 years.

Per DEIS Volume I Table 86, listed potential impacts from [winter?] motorized recreation only consider impacts from illegal use. Legal use also has significant potential impacts and OSV use is occurring prior to Subpart C of Travel management rule designation.

In addition, DEIS Volume I Table 86 lists snow compaction as a threat to Canada lynx (*Lynx canadensis*). Canada lynx are present and reproducing in Ophir Valley. Canada lynx are protected under the Endangered Species Act as a threatened species. The Record of Decision in the Southern Rockies Lynx Management Direction published by the US Forest Service in 2008 includes the following guidelines: "Designated over-the-snow routes or play areas should not expand outside of the baseline areas of consistent snow compaction, unless it serves to consolidate use and improve lynx habitat." (p.14)

Forest Service lynx conservation policies were updated in the 2013 publication Canada Lynx Conservation Assessment and Strategy 3rd Edition (2013 LCAS). The 2013 LCAS includes the following findings and guidelines: "It has been suggested that crusting or compaction of snow may reduce the competitive advantage that lynx have in soft snow because of their long legs and low foot loadings." (2013 LCAS P-26)

The section titled Conservation Measures for Recreation Management lists the following recommendations. "Manage winter recreation activities within LUAs (linked usage areas) such that lynx habitat connectivity is maintained or improved where needed," and "To minimize habitat loss, concentrate recreational activities within existing developed and high winter-use areas, rather than developing new sites and facilities in lynx habitat. On federal lands in areas with low levels of recreation currently, consider limiting the future development or expansion of developed winter recreation sites or concentrated winter use areas." (2013 LCAS P-94).

At nearby Trout Lake, the FS maintains there should be no net increase in groomed trails in order to mitigate impacts to the Canada Lynx: "Lizard Head Pass has been identified by the U.S. Fish and Wildlife Service (FWS) as a 'lynx linkage', an area that connects known tracts of suitable lynx habitat. ... Consequently, in order to avoid impacts, the Forest Service will follow FWS guidelines which direct that there be no net increase in groomed winter routes within this suitable lynx habitat." (May 2015 scoping letter to the Telluride Nordic Center)

As elk, mountain lions and moose are also present in the Ophir Valley during winter months, all motorized traffic should be restricted from December 1 to June 15, including OSV and maintenance equipment to limit impacts to existing calving areas and increase calving opportunities. "Winter and spring are especially stressful times for wildlife. They are struggling to survive and reproduce when resources are already scarce and all of their energy is put towards survival. This is a highly sensitive time when vehicular traffic and noise can be very disruptive by confounding that stress even more" (USFS Fish and Wildlife Biologist, Kristen Meyer).

For these many reasons, we respectfully request the planning committee to change the designation of Ophir Valley (consisting of the Howards Fork watershed east of HWY 145, including Waterfall and Swamp canyons) to a Winter ROS as Semi-Primitive Non-motorized.

With respect to the Summer ROS we wish to emphasize our commitment to protecting the valley from excessive motorized use and would encourage recreation to be sustainably managed. We appreciate that preferred Alternative B designates the lands on the north and south sides of the Ophir Pass Road as "semi-primitive non-motorized". In 2005, under the jurisdiction of US forest ranger Kathy Peckham, several gates were installed in the east end of the Ophir Valley, closing motorized use on mining roads in Waterfall Canyon, Swamp Canyon,

Carbonero and Chapman Gulch. Several of these gates have been damaged by avalanches since then and Ophir has been in communication with current forest ranger Megan Eno requesting to move the gates to within eyesight of Ophir Pass Road.

Additionally, GDL-REC-12 makes the prohibition of motorized use of designated routes a guideline. It must be a standard. It is required by the Travel Management Rule: "After these roads, trails, and areas are designated, motor vehicle use, including the class of vehicle and time of year, not in accordance with these designations is prohibited by 36 CFR 261.13." 36 CFR 212.50. There has been a steady increase in OHV traffic in Ophir and across the GMUG over the past several years, with the summer of 2020 seeing exponential increase.

Regarding the ROS Settings and analysis, "Pristine" summer has not been mapped and is not included in the summer management plan. The back of Waterfall and Swamp Canyons following the boundaries established by CORE Act seem to fit the criteria for "Pristine." If this area is not found to be suitable upon further examination, there are certainly other areas in GMUG that can and should be categorized as "Pristine."

#### Other Management Designations

The Town of Ophir supports the Wilderness Area recommendations in Alternative D, and urges that those be included in the final plan. Alternative B's 34,000 acres of recommended wilderness is a small reflection of lands that should be recommended. Ophir would encourage the inclusion of CORE act wilderness and special management area designations in the final document. We agree with the public comment from San Miguel, Ouray, Gunnison, and Hinsdale Counties Boards of County Commissioners which states;

"The GMUG specific Wilderness, Special Management and Mineral Withdraw designations included in the CORE Act are the result of more than 10 years of collaboration among local leaders, businesses, and ranchers in San Miguel, Gunnison and Ouray Counties. It is currently under consideration by the Senate after passing the House. The Preferred Alternative must include the Wilderness and the Special Management Area designations included in the Bill."

Town of Ophir supports the 246,000 acres of Special Management Areas (SMAs) in Alternative D. These SMAs include beautiful, wild, and beloved Waterfall and Swamp Canyons on the south side of the south side of Ophir valley. The Town of Ophir obtains its drinking water from surface water intake in Waterfall Creek. Ophir is committed to maintaining watershed health and seeks Forest Service partnership by creating a SMA to protect and/or restore watersheds with a focus on building a resilient watershed and healthy forest. In August 2020 the Town of Ophir completed a Source Water Protection Plan. The Source Water Protection areas for these water sources include the Waterfall Creek watershed, and a 100-foot buffer around the pipeline from Waterfall Creek to Ophir's treatment facility.

Ophir strongly supports the concept of Wildlife Management Areas (WMAs) in the revised forest plan and suggests that these be retained and strengthened with additional plan components. This important management area designation could help protect habitat for a variety of wildlife species. An additional component for WMAs is needed to ensure retention of security habitat for big game. Ophir recommends a standard or guideline that requires or encourages maintenance of habitat blocks at least 500 acres in size having no roads or other human intrusions into big game habitat in all areas assigned as WMAs. This standard or guideline is needed to allow achievement of MA-DC-WLDF-01: "Large blocks of diverse habitat are relatively undisturbed by routes, providing security for the life history, distribution, and movement of many species, including big-game species. ..." In places where Alternative D's wilderness and SMA recommendations overlap with the WMA-base identified in Alternative B, we support the stronger management prescriptions that Alternative D's wilderness and SMA areas provide. Ophir recommends that GDL-SPEC-16, concerning travel route realignment to reduce habitat fragmentation and increase habitat security, becomes a standard.

MA-STND-WLDF-02, limiting open motorized and non-motorized route density to one mile per square mile, is

good, but as currently written, this standard only applies to non-administrative system routes. Even though "new permanent roads are not currently being created for timber management activities" (DEIS at 393), this standard would not protect wildlife from the temporary roads typically created during timber sales. Such roads, though officially not open to public use, can attract motorized users. These roads are often not posted as being closed and do not appear on motor vehicle use maps. Therefore, this MA needs direction, preferably a standard, to minimize creation of temporary roads and to close and obliterate all temporary roads as soon as possible after completion of management activities, unless the environmental documentation for the project shows a need to add any of these roads to the system as roads or trails.

In our previous comment letter, submitted in December 2017, we noted our preference that the Ophir Needles be managed in a manner that protects the unique scenery of the area, but does not interfere with public enjoyment and recreation, particularly climbing. We appreciate the designation of Ophir needles as a Special Interest Area in all alternatives.

#### Invasives and Species of Conservation Concern

One of the highest priorities for the Town of Ophir is to maintain an active partnership in management of invasive species. We are eager to participate in management projects on adjacent lands to any projects that occur in our area under FW-OBJ-IVSP-02, 03. Continuity in management across jurisdictional boundaries is the only way to effectively mitigate invasive species.

Ophir is concerned that certain species of conservation concern (SCC) are not included in the GMUG's SCC list despite being species that Colorado Parks and Wildlife (CPW) has designated as Species of Greatest Conservation Need (SGCN) in the State Wildlife Action Plan (SWAP). SCC that should be included are: the American marten, bighorn sheep, northern goshawk, boreal owl, Lewis's woodpecker, flammulated owl, several species of potentially imperiled bats, ptarmigan, western bumblebee, bighorn sheep, House's sandwort, reindeer lichen, Colorado Divide whitlow-grass, and tundra buttercup. We are particularly concerned that bighorn sheep has been left off the SCC list, given its vulnerability to disease passed from livestock and to habitat fragmentation. STND-SPEC-13, requiring separation of bighorn sheep and domestic sheep must remain a standard. Disease transmission from domestic sheep to bighorns is considered one of the biggest, if not the biggest, threat to continued viability of Colorado's bighorn sheep herds. Ophir has a history of domestic sheep traveling through the valley to San Juan County where bighorn sheep are present.

#### Climate Change

Ophir would like to echo the concern of the "red flag" issues raised by the San Miguel, Ouray, Gunnison, and Hinsdale Counties Boards of County Commissioners (BOCC).

We request that a section be included to develop a baseline for the current carbon sequestration capacity of the GMUG and a determination of the carbon emissions of projects to monitor the balance of emissions vs. sequestration.

In the Draft EIS (DEIS), on Pg. 24 carbon sequestration was addressed as such, "Public feedback requested an alternative that would maximize carbon sequestration. While each alternative would have differing levels of carbon storage, as qualitatively analyzed in the draft environmental impact statement, an alternative solely designed to maximize carbon storage would be inconsistent with the National Forest Management Act and the Multiple-Use Sustained-Yield Act. It is not carried forward for detailed analysis."

In Colorado the largest industrial source of the "super pollutant" methane gas, which is eight six times more potent than Carbon dioxide, is located on the GMUG:the West Elk coal mine. The GMUG Forest Plan revision process presents an opportunity for the Forest Service to include plan components that address uncontrolled methane venting which is associated with coal mining. A standard requiring methane mitigation to reduce greenhouse gas emissions from active and inactive coal mines must be included in the revised Forest Plan. Ophir appreciates that the draft plan contains plan components intended to guide making forest infrastructure resilient to the effects of climate changes, such as extreme weather events. We also appreciate that the draft

plan indicates the Forest Service will identify climate refugia. Protecting and connecting undeveloped areas is an important action that agencies can take to enhance climate change adaptation. However, the draft plan's objective is to identify these areas over a 10-year timeline; this is absolutely not soon enough given the speed at which the earth is warming and the climate is changing. The plan must protect these areas and not just monitor them.

To reiterate: At this time Ophir cannot support the Draft Revised Plan Preferred Alternative B as presented. Our preferred Alternative is D, however we still feel it falls short in many areas.

The substantial increase of suitable timber proposed in all alternatives is unacceptable. Ophir believes that GMUG National Forest is much more valuable for conserving biological diversity and recreation than it ever could be for timber production.

Ophir would like to see the Winter ROS of the east side of our valley changed to Semi-Primitive Non-motorized. The Town of Ophir supports the Wilderness Area recommendations in Alternative D, and urges that those be included in the final plan.

Ophir strongly supports the concept of Wildlife Management Areas (WMAs) in the revised forest plan and suggests that those be retained and strengthened with additional plan components.

Town of Ophir supports the 246,000 acres of Special Management Areas (SMAs) in Alternative D.

We request that a section be included to develop a baseline for the current carbon sequestration capacity of the GMUG and a determination of the carbon emissions of projects to monitor the balance of emissions vs. sequestration.

We appreciate the outreach initiated by the Forest Service for collaboration of this Forest Plan Revision Process. It has allowed the Town of Ophir an opportunity to share our input and influence the planning process. As stated before, the protection of Forest Service lands that surround our community is integral to our health, well-being, economy, climate, and lifestyle. We hope to see the comments above and those submitted by our regional partners integrated into the Draft Record of Decision in great detail. The Town of Ophir comments made over the last several years have maintained consistency in supporting this plan. We look forward to the next phase in the planning process and viewing the Draft Record of Decision. Through this collaboration it is our hope that reasonable adjustments can be made to bring the plan into better alignment with regional priorities. Thank you again for the collaboration, partnership, and opportunity to provide feedback on the Draft Plan.

Regards,  
Corrine Platt, mayor  
Town of Ophir