

Data Submitted (UTC 11): 11/26/2021 11:00:00 AM

First name: Starr

Last name: Jamison

Organization: San Miguel County

Title:

Comments: Good evening Sam,

Please accept our comments for the GMUG forest plan revision.

Have a great weekend.

Best regards

--

Starr Jamison

Natural Resources and Special Projects Director

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[ATTACHMENT COPIED BELOW. NOTE PDF CONVERSION MAY RESULT IN FORMATTING ERRORS. REFERENCES/FOOTNOTES HAVE BEEN EMBEDDED IN BODY OF TEXT FOR CODING PURPOSES]

November 26, 2021

BOARD OF COMMISSIONERS

HILARY COOPER KRIS HOLSTROM LANCE WARING

Attn: Sam Staley, Forest Planner GMUG Forest Plan Revision Team 2250 South Main St

Delta, CO 81416

Submitted Via online comment form and via email: [samantha.j.staley@usda.gov](mailto:samantha.j.staley@usda.gov) Re: Draft Plan and Draft Environmental Impact Statement

Dear GMUG Planning Team,

San Miguel County recognizes and appreciates the GMUG Plan Revision Team's considerable work on the GMUG Draft Revised Forest Plan. There have been extensive public engagement and participation opportunities

and the GMUG Planning Team has been available to discuss topics and matters in more detail when asked. We also appreciate the additional time and active collaboration with GMUG cooperating agencies, including counties to date. The complexities involved to accommodate public needs, natural resources adequately, and a rapidly changing climate enhance the need to prepare for our forests' future thoroughly.

Providing educational opportunities and outreach for public comment is critical for the public process. The County has held numerous public meetings discussing the GMUG Forest Plan revision and created a [ldquo]submit a comment[rdquo] tab on our website, hopefully improving public access to the ability to comment.

Collaboration is critical. The County relies on its partnership with Federal, State and Local agencies and non-profit organizations. Consulting with and pooling resources enables us to support our County goals and provide a wide range of feedback.

We encourage the USFS to use the best available science when moving forward on a plan that will direct decision-making for the next 10-15 years. Alternative D provides more consistency and alignment with our goals than Alternative B but remains flawed as presented. The following feedback is organized by Plan Sections.

#### A. Suitable Timber

We continue to oppose the substantial increase of suitable timber proposed in this Draft Plan. The implementation of SBEADMR has made it clear that even with a ten-year programmatic NEPA decision, the industry cannot support a significant increase in timber production.

During negotiations for the designations of the CORE Act, the Suitable Timber overlay was used as an effective delay. Even with broad stakeholder support from surrounding communities and the recognition of the low probability for timber production a single industry was able to impede the progress of the widely supported and economically beneficial protective designations proposed. As stated in the 2012 Planning Rule: [ldquo]This final planning rule requires that land management plans provide for ecological sustainability and contribute to social and economic sustainability, using public input and the best available scientific information to inform plan decisions. The rule contains a strong emphasis on protecting and enhancing water resources, restoring land and water ecosystems, and providing ecological conditions to support the diversity of plant and animal communities, while providing for ecosystem services and multiple uses[rdquo] [[https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5362536.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5362536.pdf)]. Following this direction any increase in timber suitability and production must be adequately balanced with increased protections of ecological systems, wildlife and recreation opportunities that are a growing economic benefit for surrounding communities.

We support a responsible timber production program that contributes to Forest wide 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. The objective of any timber harvest should be to promote resiliency for future forests and the ecosystem services they provide. We also ask that the GMUG prioritize wildfire mitigation that protects communities and critical infrastructure, including watersheds. We agree that timber production technology has improved since the last forest plan was completed. However, the addition of steeper slopes should only be considered if the natural resources can be

protected to enhance the opportunity for resiliency of the forests.

Areas ultimately identified as appropriate for timber harvest should include multiple benefits such as wildlife habitat enhancement, water resource protection and enhancement, hazard mitigation of Wildland Urban Interface (WUI) areas, hazard mitigation for critical community infrastructure or benefits to recreation opportunities.

With the increase in slope angle, allowing for timber suitability at up to sixty percent slopes, based on the anticipation of newer harvesting technology, it will be necessary to ensure that any harvests or forest treatments do not degrade watershed health, scenic resources, or increase blowdown, erosion, or avalanches.

We support the following comments from the Conservation Community and recommendations on fuel treatments:

1. Lands that are suitable for timber production must be [ldquo]based on the compatibility of timber production with the desired conditions and objectives for those lands.[rdquo] The 750,000 acres of suitable timber proposed in Alternative D should be compatible with the desired conditions and other plan components for an alternative that emphasizes protection of special areas, areas that are [ldquo]excluded from timber production.[rdquo](DEIS Pg. 23) This includes 261,000 acres recommended for wilderness designation, 246,000 acres of special areas (MA 3.3) and 12,000 acres of research natural areas (FSH 1909.12, section 61.1.). In addition, Wildlife Management Areas should include Desired Conditions, Standards and Guidelines that ensure any timber harvests protect and enhance wildlife habitat.

2. This Draft 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 team was not required to analyze slopes over 40 percent or speculate as to future technological advances for steep slope harvest.

3. The suitability analysis considers land on steep slopes (i.e., greater than 40 percent) to be suitable, [ldquo]under the assumption that new technology and approaches would likely make timber sales economically feasible in these areas[rdquo]. Much more important than economic feasibility is complying with NFMA[rsquo]s requirements at 16 U.S.C. 1604(g)(2)(E), which requires the USFS to ensure that timber will be harvested from National Forest System lands only where:

? soil, slope, or other watershed conditions will not be irreversibly damaged;

? there is assurance that such lands can be adequately restocked within five years after harvest, and;

? protection is provided for streams, stream banks, shorelines, lakes, wetlands, and other bodies of water from detrimental changes in water temperatures, blockages of watercourses, and deposits of sediment, where harvests are likely to seriously and adversely affect water conditions or fish habitat; [hellip]( Planning Rule at 36

CFR 219.11(a)(1)(iv))

4. Timber harvesting and associated operations, such as road construction and use, skidding, and piling, can damage any terrain but are more likely to cause problems on steep slopes since soil erosion is more likely, as is possible damage to watersheds. For the GMUG, 18 percent of timber-suitable lands are in areas with high erosion potential for alternatives A, B, and C, and 12 percent for Alternative D. Lands with moderate erosion potential make up 44 percent of suitable lands in Alternative A, B, and C, and 43 percent in alternative D (pg. 277) Lands with high erosion potential should not be suitable for timber production, as the potential for irreversible damage is relatively high.

We support the Town of Ophir's comments in opposing the substantial increase of suitable timber:

1. It interferes with consideration of responsible management of the forests,
2. GMUG National Forest is much more valuable for conserving biological diversity and recreation than it ever could be for timber production,
3. 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,
4. The designation of areas as suitable timber could stand in the way of future protection for land around Ophir that is included in the CORE Act

B. Colorado Outdoor Recreation and Economy (CORE) Act

We are supportive of Alternative B's inclusion of wilderness recommendations in the San Juan Mountains that are contained in the CORE Act, and ask that those be brought forward and included in the GMUG's Final Plan.

C. Fens

Fens within San Miguel County have been identified in the Cones and Middle San Juan's areas (see figures 1 and 2) according to the Inventory of Fens in a Large Landscape of West- Central Colorado [[https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5363703.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5363703.pdf)].

The Cones area comprises almost 60,000 acres, parts of the upper portions of the Beaver Creek and Fall Creek watersheds. The Cones area has been somewhat explored for fens; an extensive survey of fens for restoration was conducted in the southern portion (Chimner and others 2008) [MISSING CITATION]. About one half (49%) of the potential fen sites in this area have been studied. Based on the inventory results there are approximately 42 ([plusmn] 57) fens in this area. Disturbances in the fens were all animal-related: browsing, grazing, and trampling (Figure 4-37). Condition scores were high (32 [ndash] 36) for all four fens investigated.

The Middle San Juan Mountains area comprises almost 188,000 acres, parts of the upper portions of the Uncompahgre River, San Miguel, Fall Creek, Alder Creek, and Dallas Creek watersheds. The Middle San Juan Area has been explored for fens. An extensive survey of fens for restoration was conducted in this area (Chimner and others 2008) [MISSING CITATION]. Over a third 37. 1% of the potential fen sites in this area have been studied. Based on the inventory results there are approximately 193 ([plusmn] 129) fens in this area. Electrical conductivity of water in the pit averages higher in this area than any other on this Forest (Table 5-2). Browsing and beaver activity account for most of the disturbances observed in this area, however human disturbances are also significant, such as erosion, roads, and trails. Condition ratings range from moderate to high (21 [ndash] 36), averaging high (28.4); about 70% of sites are rated high condition Inventory of Fens in a Large Landscape of West-Central Colorado [[https://www.fs.usda.gov/Internet/FSE\\_DOCUMENTS/stelprdb5363703.pdf](https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/stelprdb5363703.pdf)].

[EXCERPTED: Figure 1 Cone's Area Fens]

[EXCERPTED: Figure 2 Middle San Juan's Fens within San Miguel County]

The location of fens within San Miguel County raises concerns due to proximity of motorized and mechanized trails, ski area operations, logging, wildfire mitigation, future development, and human activity. Active restoration needs as well as protective measures to reduce the risk of impacts should be considered, for example relocating dispersed campsites, managing motorized and mechanized recreation (such as ATVs and snowmobiles), or addressing user created routes [Johnston, et al., April 6, 2012].

According to the fen research in 2009-2010, additional research is needed to improve accuracy. The search image applied during the photo-interpretation step identified wetlands reasonably well (81% accuracy), but less so for fens (36%). The characterization of fens could be improved with an initial field season focused solely on developing and refining a fen search image. Improved photo-interpretation could then facilitate a second more efficient and intensive field season with more specific objectives, and a more highly skilled crew [Johnston, et al., April 6, 2012].

We would like to request a Fen Management Zone, which will not allow their hydrology to be altered or degraded.

1. Develop a standard that requires there be no disturbance, dewatering, degradation, ditching, damming, and flooding or sediment deposition to a fen on the GMUG. Fens are rare, complex and little understood peat-forming wetlands that require protection of both vegetation and groundwater hydrology. They take over 10,000 years to form. Fens and their groundwater hydrology are not protected by a simple surficial buffer.
2. Develop a standard that creates an exclusion zone around the fen and areas that are hydrologically connected.

We support the following comments and interest from CNHP and Colorado Native Plant Society regarding Fens, Species of Conservation Concern, Ecosystems, Riparian Management and Groundwater, Invasive Species, At-Risk Species, Soil, Range Management, Recreation Management (Winter Resorts), Recreation (Biophysical Impacts), Watersheds and Water Resources.

[REFORMATTED TABLE TO PLAIN TEXT FOR CODING PURPOSES]

Plan, FW-DC-ECO-02: Add: There are uncommon ecosystems in the GMUG (i.e. fens, alpine tundra) that are not resilient to human activities (i.e. ditching, flooding, off-trail motorized vehicles).

Plan, FW-STND-RMGD-07, Table 3: The Watershed Conservation Practices Handbook (FSH 2509.25) is way out of date, especially regarding fens (Austin, see WCPH edits attachment). A 100' buffer is not big enough for GMUG fen protection (Kate Dwire, Research Ecologist, Rocky Mountain Research Station).

Plan, FW-STND-RMGD-08: Add on to this standard: Update existing Fen Inventory (Johnston et al. 2012) using Google Earth.

Plan, FW-GDL-RMGD-12: Fuel, oil, gas, and other toxicants could definitely impact the water quality in a fen. Please change this to a standard!

Plan, FW-GDL-RMGD-13: Add: Revisit firelines to ascertain no sediment delivery into fens, wetlands, or streams.

Plan, FW-GDL-RMGD-15: Please change to standard!

Plan, FW-DC-SOIL-02 (new): Soil disturbance with heavy equipment is minimized on the GMUG.

Plan, FW-STND-SOIL-04 (new): To maintain the presence of Histosols (i.e. peat) and carbon sequestration in the GMUG, concentrate water storage development and maintenance on already heavily impacted fens that are not restorable (i.e. X-fens) (Austin 2008).

Plan, Watersheds & Water Resources (WTR), Management Approaches, last bullet statement: The Watershed Conservation Practices Handbook (FSH 2509.25) is way out of date, especially regarding fens (Austin, see WCPH edits attachment). A 100' buffer is not big enough for GMUG fen protection (Kate Dwire, Research Ecologist, Rocky Mountain Research Station).

[REFORMATTED TABLE TO PLAIN TEXT FOR CODING PURPOSES]

Weed Management/Plants

Plan, FW-GDL-IVSP-07: Please change to standard!

Plan, FW-STND-SPEC-30 (new): Need a standard common to all Federally Listed and SCC plant species: Prohibits ground disturbance within 600 feet of all Federally Listed and SCC plant species.

Plan, FW-GDL-SPEC-31: This guideline needs to be changed to a standard please.

Plan, FW-GDL-SPEC-32 (new) - recommend this as a standard: Add the Rio Grande NF Plan guideline: "G-SCC-2 prohibits permanent ground disturbance within 100 feet of this species" (Rio Grande Plan pg. 199).

Plan, pg. 104, bullets: Why is the GMUG not proposing to monitor any Federally Listed or SCC plants? Even if 5 per year were monitored, it would be something.

Plan, pg. 298, Data and Information Considered: Please consider the following GMUG plant communities (PCA's, CNHP 2021) of "Outstandingly Remarkable Value". None were included in the EIS 2, Table 60.

EIS 2, Appendix A, Carex leporinella: FW-STD-RMGD-10 needs to be added for this plant species.

#### D. Species of Conservation Concern (SCC)

Protection for biodiversity and alpine ecosystems are a high priority for San Miguel County. Most of the proposed SCC plants live in fen and alpine habitats. Many of these habitats on the GMUG have threats or are being impacted by human activities. We appreciate that CNHP data has been consulted as one of the best available scientific resources therefore we support the following recommendations from Colorado Natural Heritage Program and the ColoradoNative Plant Society:

1. ALL their comments regarding the species list from Table 53 and other species that qualify to be designated as SCC and
2. Table 51 of Appendix 9 lists species to be designated as SCC, including G1 and G2 species. Two important G/T2 species listed below are missing from that list. Chapter 10 of the Planning Handbook [ldquo]directs that G1G2 species are expected to be listed as SCC unless there is evidence that the known threats do not operate

in the planning unit[rdquo].

*Draba exunguiculata* (G2 S2) 3 documented occurrences on the boundary of Gunnison and San Isabel NF. Both forests need to take responsibility for this species. Threats - climate change, domestic sheep grazing.

*Phacelia scopulina* var. *submutica* (G4T2 S2) - 3 documented occurrences on Grand Mesa NF (Listed threatened). Threats - annual threatened by climate change, stochastic events, off-road trail use.

*Physaria rollinsii* (G1G2 S1S2) 41 documented occurrences along HPP transects on Gunnison RD (HPP transects, Austin pers. comm.). Threats - livestock grazing, increasing off-trail ORV use, planned recreation development occurring in habitat northeast of Gunnison, increased off-leash dog use in habitat, climate change drying in lower elevations, spread of cheatgrass,

*Sclerocactus glaucus* (G2G3 S2S3) 2 documented occurrences on GMUG (Listed threatened). Threats - increase in off-road vehicle use (Barry Johnston 2005). Climate change drying and collectors. This species has been recommended for de-listing, so may be removed if there is a change in status.

San Miguel County also supports the following Town of Ophir[rsquo]s comments regarding SCC and agrees with the importance of maintaining an active partnership in management of invasive species.

1. SCC that should be included are: the American marten, bighorn sheep, northern goshawk, boreal owl, Lewis[rsquo]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.

2. We are particularly concerned that bighorn sheep have 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.

3. One of the highest priorities for the Town of Ophir is 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.

#### E. National Wild and Scenic River Scenic River System Eligibility

We support the following segments to be eligible for inclusion in the National Wild and Scenic River System:

1. Fall Creek (N-1)
2. Muddy Creek (N-2)
3. San Miguel River (N-5 and N-6)

In addition, we support the following comments from American Whitewater.



[ldquo]The Eligible Wild & Scenic Rivers desired conditions and standards included in the Draft Revised Forest Plan should be supported with additional plan components. While desired conditions essentially refer to the [ldquo]wild, scenic and recreation[rdquo] criteria included in the Wild and Scenic Rivers Act (See FW-DC-WSR-01, FW-DC-WSR-02, and FW-DC-WSR-03), the sole standard included refers only to the Forest Service Handbook regulations in place to implement the act. We fully support managing eligible reaches and sub-basins in accordance with management direction contained in Forest Service Handbook (FSH) 1909.12, Chapter 80, Section 84, FSM 2354, and the Wild and Scenic Rivers Act. However, the 2012 Forest Planning Rule directs the Forest Service to include standards or guidelines for the management of eligible rivers to protect the values that provide the basis for their eligibility determination. Additional plan components, including standards, are needed in the forest plan to adequately protect eligible Wild and Scenic Rivers, their free-flow character, and their identified values.[rdquo]

San Miguel County values recreation on our National Forest and appreciates the expertise from the Outdoor Alliance, a coalition of ten member-based organizations representing the human-powered outdoor recreation community. Due to their broad recreational interest and dedication to the GMUG through their The Outdoor Alliance GMUG Vision (OAGV) v21 we have consulted with their team to support the following comments:

1. Plan Components

The GMUG Draft Revised Forest Plan is light on plan components and we believe that there is room for improvement.

2. Riparian Management Zones and Groundwater-Dependent Ecosystems

Forest plan components that should be revised to protect the health of riparian areas.

## Standards

Maximum pool elevation of constructed pond and reservoirs with shorelines composed of riparian vegetation, whichever is greatest.

Revise, FW-RMGD-STND-08: In the riparian management zone, management activities and new structures must maintain or restore the connectivity, composition, function, and structure of riparian and wetland areas in the long-term, as consistent with the Watershed Conservation Practices Handbook and its exceptions (FSH 2509.25 and FS 990A or equivalent direction).

Revise, FW-STND-RMGD-09: To maintain stream thermal cover and prevent windthrow within the riparian management zone, timber harvest shall not occur in riparian management zones.

Revise, FW-STND-RMGD-07:

Category 2: Fens, wetlands, lakes, springs and reservoirs: consist of the body of water or wetland and the area to

the outer edges of the riparian vegetation; or to the extent of the seasonally saturated soil; or 100-foot slope distance from the edge of the wetland or the maximum pool elevation of constructed pond and reservoirs with shorelines composed of riparian vegetation, whichever is greatest.

#### Guidelines

Add, FW-GDL-RMGD-XX: Riparian habitats should be managed to be relatively free from alterations and promote connectivity for species movement, re-connect fragmented populations and support genetic exchange.

Add, FW-GDL-RMGD-XX: Modifications, mitigations, or other measures should be incorporated to reduce negative impacts to riparian habitats to help provide for species needs. Project activities and special uses must be designed and implemented to maintain riparian refugia and critical life cycle needs of species, particularly for at-risk species.

#### 3. Recreation Opportunity Spectrum

The GMUG Planning Team should create a new section in the Draft Revised Forest Plan that focuses solely on ROS, and follow the example set by the Custer Gallatin National Forest, which clearly identifies the plan components for each ROS setting.

Additionally, we have identified several errors and omissions that should be rectified in the release of the Final Environmental Impact Statement, including:

? The recreation opportunity spectrum (ROS) modeling data is incomplete and needs to be thoroughly reviewed and evaluated.

? The Summer ROS has not been fully modeled and Summer pristine allocations are missing from the Draft Revised Forest Plan.

? There are several attribution errors in the Winter ROS data:

1. Pristine Wilderness settings should be Pristine.
2. Pristine settings should be Primitive.

Tables 10-15 should be translated into plan components. The Custer Gallatin Draft Revised Forest Plan<sup>2</sup> is a good example of how ROS settings can be translated into plan components.

Additionally, it is essential that winter ROS reflects future desired conditions and sets the stage for future travel

management planning.

#### 4. Watersheds and Water Resources

San Miguel County strongly believes that the rivers, streams, and water resources within the GMUG provide key ecosystem services, recreational opportunities, drinking water, and sustain wildlife and aquatic ecosystems. Maintaining healthy watersheds and improving watershed conditions should be prioritized, especially in watersheds that provide drinking water, recreational opportunities, and support sensitive species.

Under the Planning Rule, plans must, [ldquo]identify watershed(s) that are a priority for maintenance or restoration[rdquo]. 219.7(f)(1). Furthermore, [ldquo]the Interdisciplinary Team should develop plan components to address conditions in priority watersheds[rdquo] [FSH 1909.12, section 22.31].

It is imperative to have the plan components necessary to protect riparian areas, as required by the Planning Rule at 219.8(a)(3). The Forest Service[rsquo]s Watershed Conservation Practices Handbook (WCPH), FSH 2509.25, must be incorporated into the revised Plan and each EIS alternative. The management practices therein must be forest-wide standards and should meet at least some of the requirements of the Planning Rule for riparian areas. (See 219.8(a)(3) Additional standards and guidelines may be needed to protect riparian areas and wetlands, including fens fully. The latter are irreplaceable, so they deserve a high level of protection.

#### Desired Conditions

Revise, FW-DC-WTR-02: The Forest Service and stakeholders actively coordinate in sustaining ecological and hydrologic processes to continue to provide critical water supplies[mdash]including water quality[mdash]to communities and water users. See also the multiple ecosystem sections and the Forestwide objective for infrastructure, INFR-03.

#### Objectives

Revise, FW-OBJ-WTR-04: Within 15 years, trend at least 30 percent of sub- watersheds toward improved watershed conditions, including their chemical, physical, and biological attributes, based upon the watershed condition framework or other accepted protocols. Actions to help accomplish this objective may include rehabilitating areas to reduce erosion and sedimentation delivery to water bodies, improving 303(d)-listed streams, and/or other passive or active restoration efforts. See also the Forestwide objective for infrastructure, INFR-03.

#### Guidelines

Add, FW-GDL-WTR-XX: New and reauthorized management activities should not cause departure from desired conditions.

Add, FW-GDL-WTR-XX: To encourage natural channel morphology and human safety on perennial and intermittent streams, new or redesigned stream crossings (such as bridges and culverts) should be wide enough to successfully pass water, sediment, wood, aquatic organisms, and river recreationists.

Add, FW-GDL-WTR-XX: Where known, groundwater recharge areas should be protected or restored to maintain water quality and quantity (discharge).

#### F. Winter ROS

Programmatic forest plan decisions such as winter ROS and suitability determinations must be followed by implementation-level travel planning to designate discrete areas and routes where OSV use is allowed, restricted, or prohibited, based on the executive order/regulatory minimization criteria and site-specific NEPA analysis, to minimize environmental damage and conflicts with other recreational uses.

As stated in the DEIS 1, [ldquo]With assistance from the cooperating agency counties, the GMUG considered and evaluated county plans for consistency during the planning process[rdquo]. We have recognized discrepancies with the ROS and San Miguel County[rsquo]s Comprehensive Development Plan in the Telluride/Ophir High Country area (See Figure 3 [ndash] Table 11 from DEIS Vol. 2).

[EXCERPTED: Table 11 from DEIS V.2 APPENDIX COMPARING AREA PLANS]

To align with The San Miguel County Comprehensive Plan we recommend semi-primitive non-motorized in Bridal Veil Falls and Upper Bear Creek (next to Telluride Mountain Resort). These areas have high alpine-sensitive ecosystems and provide quality backcountry skiing experience, from the Town of Ophir and side country access from the ski area that deserve protection. This use would undoubtedly be inappropriate in the narrow steep canyon corridor. The Summer and Winter ROS class for these areas should be semi-primitive non- motorized, respectively.

We would also like to support all Town of Ophir[rsquo]s comments regarding the Recreation Opportunity Spectrum.

[EXCERPTED: Figure 4 Bridal Veil and Upper Bear Creek Winter ROS Alternative B]

#### G. Summer ROS

We do not support Bridal Veil and upper Bear Creek (adjacent to Telluride Mountain Resort) as semi primitive motorized. These areas have high alpine-sensitive ecosystems and provide quality hiking, biking, and backcountry experiences that deserve protection. Hundreds of hikers use the Bear Creek Rd in summer and continue up the rugged Wasatch Trail that bikers also enjoy descending from the backcountry or ski area creating a high alpine loop. The introduction of motorized use would be a safety concern for the amount of pedestrian traffic as well as, user experience, and fragile alpine ecosystems. The ROS class for these areas should be semi-primitive non-motorized. The Town of Ophir also does not support the area adjacent as semi-primitive motorized due to similar concerns (see the Town of Ophir[rsquo]s ROS comments).

In the area of Beaver Park identified as semi-primitive motorized (see Figure 4), we recommend this area be re-analyzed and potentially reduced in size due to wetland fens in the area (see Fen Section).

[EXCERPTED: Figure 5 Beaver Park Semi-primitive Motorized Alternative B]

[EXCERPTED: Figure 6 Bridal Veil and Upper Bear Creek Summer ROS Alternative B]

#### H. Recreation Emphasis Corridors

Recreation Emphasis Corridors focus on dispersed camping versus high-use recreation areas. There is an increased demand across the GMUG for more designated and dispersed camping opportunities. We support a management designation to increase designated camping in appropriate areas and suggest that [ldquo]Recreation Emphasis Areas[rdquo] should be [ldquo]Designated Camping Areas[rdquo] to better define the intent of this designation, which should include prescriptions to mitigate and manage this activity.

San Miguel County recognizes an increased demand for more recreational opportunities across the Forests, especially trail development. Trail advocates need better direction on areas that are suitable for the development of loop trail systems, trailhead infrastructure and existing trail connections. Outdoor Alliance has identified several recreation emphasis areas where different recreational uses are concentrated and receive more visitors than other areas of the GMUG, and have identified areas that may see increasing use in the future. The Planning

Team should review Outdoor Alliance[rsquo]s proposed [ldquo]Recreation Focus Areas[rdquo]. This Plan needs to better identify appropriate recreation areas to address the growing demand while preserving the health and integrity of the surrounding natural and cultural resources.

Throughout the Plan and DEIS there are references to both Recreation Emphasis Areas and Recreation Emphasis Corridors. This verbiage should be streamlined reducing confusion. Additionally in the DEIS 1 pg. 26, we would like to stress the need for landscape scale analysis encompassing current trails, connectivity to residential and high use recreation areas.

San Miguel County supports the Outdoor Alliance that [ldquo]Recreation Emphasis Areas[rdquo] should be added as a management area in the Draft Revised Forest Plan and their descriptions as follows:

#### Desired Conditions (for Recreation Emphasis Areas (REA))

Add, MA-DC-REA-XX: Recreation emphasis areas provide sustainable recreational opportunities and settings that respond to changing recreation desires. Local communities can readily access these areas for a variety of motorized and non- motorized experiences.

Add, MA-DC-REA-XX: Trail systems connect communities to recreation emphasis areas.

Add, MA-DC-REA-XX: Loop trail opportunities are available.

Add, MA-DC-REA-XX: Educational programs are available for recreation users to learn about topics such as the prevention of spread of invasive species, wildlife-human conflicts, safe fire use, and sharing trails.

Add, MA-DC-REA-XX: Vegetation management complements the recreational setting over the long term.

Add, MA-DC-REA-XX: Developed recreation sites in recreation emphasis areas are accessible to all forest users.

#### Guidelines

Add, MA-GDL-REA-XX: To reduce the likelihood of establishing unplanned new visitor use patterns, temporary roads, skid trails, and landings should be constructed and rehabilitated to discourage new visitor use of that structure.

Add, MA-GDL-REA-XX: To accommodate under-represented communities, youths, seniors, and veterans, approval of new outfitting and guiding permits should emphasize proposals focused on experiential education.

#### Suitability

Add, MA-SUIT-REA-XX: Recreation emphasis areas are suitable for a high density of recreation development.

#### Recreation Emphasis Areas and Travel Planning

Public feedback requested that prior to identification of recreation emphasis areas, landscape-scale connectivity analysis be conducted as part of an actual travel management planning process. Recreation emphasis areas capture the existing most highly recreated areas, for both dispersed day use and dispersed overnight use. The intent is to manage existing uses more sustainably. Additional trails originating from such areas would be analyzed at the project level. Programmatically, the effect of these areas in the landscape context is analyzed in this draft environmental impact statement.

Please clarify this direction:

FW-OBJ-TRLS-02: Annually, maintain at least 500 miles of National Forest System trails, per the INFRA database definition of [ldquo]maintained to standard.[rdquo] Trails are prioritized by those located in recreation emphasis corridors (MA 4.2 [ndash] EMREC), by amount of use, and those where use is causing unacceptable resource damage (FW-STND-REC-08) and/or presenting hazards outside of the trail class.

Examining the relevant management area maps, these corridors are narrow ribbons that largely follow existing roads. Not only that, but they are clearly focused on management to address and alleviate dispersed camping issues, not trail impacts. Practically speaking, how many trails exist in the corridors? What is the advantage of prioritizing trails in a management area that is largely devoid of trails?

## I. Wildlife Management Areas (WMA)

San Miguel County supports the inclusion of the WMA polygons into the County as requested in our 2019 comments. We recognize it is a delicate balance to manage for Recreation and Wildlife. San Miguel County is facing increased pressure to build more recreational trails but we have limited suitable landscapes. We are surrounded by steep slopes and Wilderness which create less options for trail development. The new Trail Density model of 1 mile per square mile should be analyzed on a more detailed level using trail and road data per county including use type and visitor numbers and not a one size fits all approach.

We support the following Outdoor Alliance comments for Wildlife Management Areas:

1. Alternative D did not include any of the recreation emphasis areas or backcountry areas that Outdoor Alliance proposed, and in its current form, the Draft Revised Forest Plan lacks sufficient Forestwide Management direction to manage sustainable recreation opportunities. Notably, the GMUG has indicated that it would prefer using plan components through Forestwide Direction but the Draft Revised Forest Plan is deficient on plan components compared to other revised forest plans we have seen. Furthermore, our proposed special management area recommendations are not included in Alternative D (or any other alternative that we know of)

### 2. Desired Conditions

Revise, MA-DC-WLDF-01: Large blocks of diverse habitat are relatively undisturbed by motorized routes, providing security for the life history, distribution, and movement of many species, including big-game species. Habitat connectivity is maintained or improved as fragmentation by motorized routes is reduced.

Add, MA-DC-WLDF-XX: Landscape patterns throughout the GMUG provide habitat connectivity for wildlife, particularly wide-ranging species such as medium to large carnivores and wild ungulates. Resulting habitat connectivity facilitates daily and seasonal movement, as well as long-range dispersal of wildlife to support genetic diversity, allowing animals to adapt to changing conditions over time.

Add, MA-DC-WLDF-XX: Vegetation conditions are generally within the natural range of variation as described for vegetation, thereby providing wildlife habitat for a variety of life cycle needs, including year-round and seasonal use by a diverse suite of native species.

### 3. Standards

Revise, MA-STND-WLDF-02: MA-STND-WLDF-02: To maintain habitat function and provide security habitat for wildlife species by minimizing impacts associated with roads, there shall be no net gain in motorized system routes, where the motorized system route density already exceeds 1 linear mile per square mile, within a wildlife management area boundary. Additions of new motorized system routes within wildlife management areas shall not cause the route density in a proposed project's zone of influence to exceed 1 linear mile per square mile. Within the Flattop Wildlife Management Areas in the Gunnison Ranger District, there shall be no new routes.

Exception: this does not apply to administrative routes (see appendix 12, Footnotes Regarding Best Available Scientific Information for further detail).

#### 4. Objectives

Revise, MA-OBJ-WLDF-03: Within 5 years of plan approval, identify potential area-specific management actions for each wildlife management area to improve habitat connectivity with respect to existing motorized route densities and to achieve desired ecological conditions for constituent ecosystems. Within 10 years of plan approval, complete one action in each wildlife management area.

If the GMUG Planning Team is looking for examples, the Bridger-Teton National Forest is engaged in the "Recreation-Wildlife Coexistence Project" with multiple agencies, partners (including Outdoor Alliance), and researchers. This project has been initiated before the Assessment Phase and shows promise in developing management and education strategies that can be used to inform land management plans and actions.

San Miguel County supports the interest the Town of Ophir has for Wildlife Management Areas.

1. 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.
2. 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. [hellip]"
3. 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.
4. 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.
5. We appreciate the designation of Ophir needles as a Special Interest Area in all alternatives.

#### J. Partnerships and Coordination

Partnerships and coordination with local, State, Tribal governments, nongovernmental partners, and private landowners is essential to successfully managing our national forests. To align with San Miguel County Master Plan p. 14, West End 5.2B, Policies 2, Cooperate with the appropriate State and Federal agencies in planning and management for multiple uses on public lands, the GMUG should continue to maintain and expand partnering opportunities San Miguel County Supports the following Outdoor Alliance Comments to maintain and expand partnering opportunities across the forest to meet the desired conditions and objectives outlined in the



Draft Revised Forest Plan.

## Objectives

Add, FW-OBJ-PART-XX: Within two years of completing the revised forest plan, complete a strategic partner assessment across the GMUG National Forests to determine the scope and scale of partnered efforts, gaps in support, and identify the needs and issues related to Forest Service capacity.

Add, FW-OBJ-PART-XX: If a dedicated [ldquo]Partnership/Stewardship Coordinator[rdquo] does not exist, develop a Partnership/Stewardship Coordinator position within two years of forest plan approval to work with partners and create opportunities for collaboration and stewardship.

## Guidelines

Add, FW-GDL-PART-XX: Every year, host a discussion at the supervisor[rsquo]s office with interested local governments or their economic development offices to foster shared actions that support local jobs, attract tourism, and encourage coordination on public health and safety issues.

## K. Trails

San Miguel County Supports the following Outdoor Alliance Comments regarding Trails, across the forest to meet the desired conditions outlined in the Draft Revised Forest Plan.

## Desired Conditions

Add (Separate paragraph into distinct desired conditions), FW-DC-TRLS-01: A sustainable, diverse trail system is in place and maintained at least to the minimum standards appropriate for safe public access.

Add, FW-DC-TRLS-XX: National Forest System trails support multiple recreation use types that contribute to social and economic viability in the plan area, and connect established towns and developed recreation sites to the surrounding landscape.

Add, FW-DC-TRLS-XX: National Forest System trails are designed and maintained in a manner that ensures resource protection and facilitates positive visitor experiences.

National Forest System trails accommodate a variety of use types across a variety of terrain designed for a variety of skill levels.

Add, FW-DC-TRLS-XX: New trail development is considered in areas close to communities where open road and trail densities, and human activities, are already high (i.e., MA 4.2 [ndash] EMREC), and where multiple recreation use types connect established towns and developed recreation sites to the surrounding landscape.

Development of stacked/looped/stacked-loop trails are considered in appropriate areas and circumstances.

Add, FW-DC-TRLS-XX: National Forest System trails are clearly, yet minimally, marked, particularly where

routes cross ownership and jurisdiction. Trailheads adequately accommodate the levels and types of use occurring along the system within the prescribed desired recreation opportunity spectrum settings, and are adjusted based on resource needs and use demands.

Add, FW-DC-REC-XX: Partner organizations and communities are involved in sustainable trail planning and stewardship efforts.

## Objectives

Revise, FW-OBJ-TRLS-02: Annually, maintain at least 500 miles of National Forest System trails, per the INFRA database definition of [ldquo]maintained to standard.[rdquo] Trails are prioritized through the Trail Management Objectives process, with a focus on trails in recreation emphasis corridors (MA 4.2 [ndash] EMREC), by amount of use, and those where use is causing unacceptable resource damage (FW-STND-REC-08) and/or presenting hazards outside of the trail.

Add, FW-OBJ-REC-XX: Complete Trail Management Objectives (TMOs) for all GMUG National Forest System trails within three years, and schedule trail maintenance tasks according to frequencies identified in the TMO.

## L. Special Management Areas (SMA)

We appreciate the inclusion of the Special Management Areas from the CORE Act in Alternative D. SMA[rsquo]s are a key tool to help achieve the ecological integrity that is a central purpose of the 2012 Planning Rule, while allowing for the management of existing uses.

Corrections required for Table 21 to be accurate contemplated in the CORE Act

? Hope Lake/Sheep Mountain [ndash] For motorized suitability, the CORE Act includes administrative exceptions in addition to heli-skiing. Mechanized suitability should be changed to [ldquo]Limited new[rdquo].

? Liberty Bell Corridor Special Management Area [ndash] This should be removed as a separate SMA in Table 21, as the [ldquo]corridor[rdquo] is encapsulated within the Liberty Bell East SMA. Liberty Bell East Special Management Area [ndash] [ldquo]None identified[rdquo] should be changed to [ldquo]Limited new[rdquo] to allow for mountain bike use in the [ldquo]corridor[rdquo] within Liberty Bell East.

? Naturita Canyon [ndash] This area is not an SMA in CORE Act, rather it is a mineral withdrawal, and should be removed from Table 21.

Additionally, we support the Town of Ophir[rsquo]s comments to protect and/or restore watersheds with a focus on building a resilient watershed and healthy forest by designating 246,000 acres of Special Management Areas (SMAs) in Alternative D.

M. Colorado Roadless Areas

We support the following Conservation Community Comments regarding the Colorado Roadless Rule (CRR).

1. Recommendation: We strongly recommend that more direction, including mandatory plan components, be developed for this management area. Standards are needed to ensure that CRAs on the GMUG are protected at least as well as the CRR does.
2. To ensure CRAs are not subjected to inappropriate logging, they should be suitable for timber production.
3. Recommendation: At a minimum, the CRR's limitations on the following must be standards: tree cutting, sale, and removal; road construction and reconstruction; and the use of linear construction zones, per CRR sections 294.42, .43, and .44.
4. Recommendation: There should be an objective to obliterate unneeded, closed, temporary, or unauthorized roads in order to enhance roadless character and ecological integrity within CRAs.
5. Recommendation: Include a standard requiring that all management activities conducted within CRAs shall maintain or improve roadless characteristics. All vegetation management projects occurring in CRAs should be monitored to ensure these characteristics are retained. This needs to be added to the monitoring plan. Data should be collected regularly and reported every two years.

N. Drones

San Miguel County supports Colorado Parks and Wildlife's recommendations for the management of drones to reduce the impacts on public lands users and wildlife.

Wildlife behavior and drone use

Many animals are preyed upon by the air and can be distressed by drones flying above them. Wild animals are always hyper-aware of their surroundings because of their survival instincts. If there is a mother with young, there will likely be even more heightened reaction to the presence of drones. Additionally, many birds of prey see drones as a predator competing for food. Those using drones should maintain distance from wild animals and be on the lookout for signs of agitation. If you notice behavior changes, you are too close. Wildlife are constantly working to survive and our presence can have a major impact on their health. Flying too close or following an animal can cause distress. It is important that we all care for Colorado by employing some best practices while enjoying life outside in our beautiful state [<https://cpw.state.co.us/aboutus/Pages/News-Release-Details.aspx?NewsID=79111>].

Additionally we support the recommendation from the Conservation Communities Comments in Chart GuSG-1 [TEXT FOLLOWING DUPLICATES TEXT FROM CHART.]

Noise: Prohibit launching, landing, or otherwise operation drones in sage grouse breeding, brood, or wintering habitate.

FW-STND-REC-09: All unmanned aircraft systems also known as drones, flown from and above National Forest System lands must comply with Federal Aviation Administration and U.S. Forest Service laws, regulations, and policies. Public recreational use: [EMPHASIS ADDED: Add MA3 areas to the list of all management areas where drone use is disallowed.]

Finally, drones impact human privacy and recreational experience. The use of project level NEPA will be important, as used at Hanging Lakes and Maroon Bells. The standards could continue to be defined. Drones are considered a Mechanized and motorized activity. In the draft plan there is no guideline where drones are mentioned. Specific drone language could be added to FW-GDL-REC-12: To reduce the impacts of motorized and mechanized activities, prohibit motorized and mechanized travel outside of system routes. Exemptions are allowed for administrative, emergency, law enforcement, wildlife habitat improvement and vegetation management activities.

Additionally, we support the following comments from the Conservation Community:

1. STND-REC-09 would ban flights of [unmanned aircraft systems], or drones, in five management areas and some other areas. However, it would allow exceptions for special use permits [under certain circumstances]. The latter are not specified or described.

Recommendation: Drones should also be banned from the following MAs: Colorado Roadless Areas; 3.2 Wildlife Management Areas; and 3.3, Special Management Areas in alternative D. If drones will be allowed via special use permit, the [certain

circumstances] under which they would be allowed must be spelled out in considerable detail so that operators know where drones are restricted or prohibited and the public knows what to expect with regard to drones when they visit the GMUG. We recommend that there be no exceptions to this prohibition in MAs 1.1, 1.2, 2.1, and 4.2 other than for emergency search operations and law enforcement.

2. Recommendation: STND-WLDN-10 would prohibit the use of recreational drones in wilderness. This is a good standard and must be retained.

O. Gunnison Sage Grouse (GuSG)

San Miguel County has been actively engaged in the preservation of the Threatened Gunnison sage-grouse (GuSG) for decades and is now a responsible partner under the U.S. Fish & Wildlife [USFWS] Recovery Plan (RP) and Recovery Implementation Strategy (RIS). We are thoroughly invested in the status of the species and its habitat, and we will continue to support science-based actions. Based on historic habitat we have been coordinating with CPW and BLM land managers. However, the San Miguel Basin GuSG population is moving from increasingly arid high-desert conditions to higher, wetter areas around Miramonte Reservoir, closer

to the National Forest boundaries. The participation of GMUG staff in these efforts as the need to implement actions on USFS land.

According to the DEIS at 182, the action alternatives add [ldquo]specific Gunnison sage-grouse plan components consistent with FSM 2631.1 guidelines, and convert the CCA conservation measures into standards, guidelines, and objectives to be applied Forestwide in Gunnison sage-grouse habitat. The proposed Gunnison sage-grouse plan components are designed to reduce the effects of threats to the species, maintain or restore habitat, and contribute to recovery.[rdquo] We support the recommendation to adopt additions and modification to plan components in the Conservation Community comments Chart GuSG-1 to assure that plan components are contributing to recovery of threatened and endangered species.

Additionally, San Miguel County supports ALL comments and recommendations from the Conservation Community[rsquo]s in support of the Gunnison Sage Grouse and its habitat.

P. Monitoring

Reiterating our 2019 comments regarding the recognition of our federal lands as a critical mitigation opportunity for the rapidly changing climate, we ask 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.

Q. Climate Change

The 2012 Planning Rule establishes three phases in the development of any forest plan: assessment, planning and implementation, and monitoring, [36 C.F.R. [sect][sect] 219.5.] with each phase informed by the use of the best available scientific information [ 36 C.F.R. [sect][sect] 219.3]. The rule directs the Forest Service to seek information for the forest plan assessment (including climate change adaptation information) from governmental or non-governmental assessments (e.g., climate vulnerability assessments), plans, reports, studies, State wildlife data and action plans.

We understand the Forest Service Manual and Handbook provide guidance on the implementation of the 2012 Rule; however, the process to incorporate climate change is not prescriptive. We recommend the GMUG take a similar approach to the Rio Grande National Forest, by designing a science-management collaborative process to address climate change concerns [The Rio Grande National Forest Climate Change Plan Revision Workshop: Designing a Science-Management Collaborative Process to Address 2012 Planning Rule Climate Change Concerns at the Forest Plan Scale Molly R. Roske, Linda A. Joyce, Linda M. Nagel, Lara K. Peterson, Courtney L. Peterson, Megan Matonis].

Science-management collaboration supports the interchange among scientists and national forest staff of scientific knowledge and experiential knowledge; both are needed to support the responsible official in determining what constitutes best available science [36 CRF 219.3]. Greater exchange through science-management collaboration is needed to effectively and efficiently identify the current knowledge of climate change vulnerabilities at the local forest-level.

The RGNF plan revision used data and analysis from Oregon State University, Colorado State University, and Western Colorado University, along with workshops [3] and products led by the Rocky Mountain Research Station of the USFS. The Plan represents a more flexible and less complex approach compared to the previous Plan. Among other changes, the new Plan identifies areas within which naturally ignited fire can be managed for resource benefits under the right conditions [[http://ewp.uoregon.edu/sites/ewp.uoregon.edu/files/WP\\_100.pdf](http://ewp.uoregon.edu/sites/ewp.uoregon.edu/files/WP_100.pdf)].

Additionally, we support specific recommendations from the Conservation Community to better incorporate the best available scientific information and to improve the climate adaptation in the GMUG Forest Plan by strengthening plan components to ensure that they guide suitable climate smart management that helps the forests maintain ecological integrity and promote species viability despite warming climate conditions.

Recommendation: To summarize below, throughout the plan, include components, particularly standards and guidelines, to ensure refugia protection, increased resilience, and ecosystem transformation.

#### Key ecosystem characteristics

We are supportive of the intent of the desired conditions described under Structure, Composition and Function. FW-DC-ECO-02 expresses a desired condition of ecosystem resilience, and 03 expresses the importance of identifying refugia, as well as transformation zones where one ecosystem type may be lost and another emerging, and managing accordingly. However, the plan needs to require substantially more detailed components and references to adaptation frameworks, such as the ones described above, in order to achieve these desired conditions. This section contains a single objective (FW-OBJ-ECO-04), the identification and monitoring of areas of potential climate refugia. This objective should be updated to specify that refugia will be identified for each climate-vulnerable ecosystem type, and the time frame of this objective (10 years) is entirely too long given the urgency of the climate and biodiversity crises. The existence of considerable amounts of existing data and methodologies make it feasible to accomplish this analysis both with more specificity and in a shorter time frame. For instance, the two Resilience Project reports map areas of lost, threatened, persistent and emergent habitat types for key species like subalpine fir, Engelmann spruce, and big sagebrush for three different climate scenarios.

Furthermore, the mapping and monitoring plans expressed in FW-OBJ-ECO-04 are not sufficient to achieve the ecological sustainability of refugia areas. The plan must detail a set of components specific to each ecosystem type that will improve the likelihood of their persistence by reducing other threats. The plan does outline a management approach for bristlecone and limber pine ecosystems, which are among the most vulnerable to climate change; a similar or more detailed management approach is needed for each vulnerable ecosystem type in order to protect refugia, increase resilience, and facilitate transformation. For key areas, such as those identified as refugia under disparate climate scenarios, or for emergent areas of highly threatened ecosystem types, the plan should include standards to further constrain ecologically damaging activities.

Connectivity is the second Key Ecosystem Characteristic described in the Draft Plan. Connectivity is a key

principle of conservation biology and is increasingly important in a changing climate to allow species to move in response to ecological change. This plan section, however, contains no other plan components, and thus has no [ldquo]roadmap[rdquo] to achieve the stated Desired Condition (FW-DC-ECO-05). This section should be expanded to include plan components that enable the identification, establishment, preservation and restoration of key areas of connectivity and landscape permeability.

The Old Forest desired condition is similarly lacking in plan components. Old forests are of outsized importance in a changing climate because they harbor habitat for sensitive species, store large amounts of carbon, create microclimates of deep shade and structure that can serve as microrefugia, and provide sources of seed of species that have likely experienced and survived a variety of ecological conditions. The plan should be updated to include standards to ensure old forest protection and threat reduction.

#### Riparian management zones and groundwater-dependent ecosystems

Objectives, Standards and Guidelines in this section should prioritize the maintenance and restoration of riparian habitats, reduction of invasive species, and should prevent activities that lower water table levels and damage to riparian and groundwater-fed systems from grazing.

#### Aquatic Ecosystems

Plan components in this section should prioritize maintenance and enhancement of aquatic habitat and connectivity for native species, with a particular emphasis on imperiled and climate-vulnerable species. Several of the existing plan components, such as those favoring recreation and [ldquo]desired non-native fishes,[rdquo] may not be compatible with maintaining connected and resilient habitats. We support FW-STND- AQTC-05 and urge the Forests to expeditiously proceed with replacement and upgrading of bridge and culvert structures that impair aquatic connectivity. We also support FW-GDL-AQTC-08, as beavers are an important keystone species and ecosystem engineer that can provide climate adaptation benefits for aquatic, meadow and groundwater systems.

#### Invasive Species

We support the Desired Conditions and Objectives in this section; however, the Standards pertain only to halting the introduction and spread of invasive species, and not on increasing resilience of ecosystems. The Sagebrush Landscape Report provides an example of a quantitative, resilience-oriented objective for invasive species: [ldquo]By 2035, reduce and prevent the impact of invasive species such as cheatgrass with 80% confidence level so that sagebrush systems are more resilient to climate change. Focus control efforts on highest priority pathways and sagebrush areas, such as along/near roadways where invasive species are starting to infiltrate large, contiguous patches of sagebrush and large sheep bedding areas.[rdquo]

#### Fire and fuels management

The Draft Forest Plan, with no Standards and only one Guideline pertaining to fire and fuels management, essentially lacks [ldquo]a roadmap[rdquo] (per the Figure 2 schematic) to reach the stated Desired Conditions. Even the management approaches are aimed at protecting infrastructure, not at promoting ecosystem resilience.

#### Native species diversity

Throughout the Native Species Diversity section, increasing resilience to future climate conditions is only mentioned once, as a Management Approach for pollinator species. The forest plan should detail additional plan components to ensure the viability of species, including protecting refugia, improving habitat quality, and reducing other threats and stressors.

#### At-risk species

As with Native Species diversity, the At-Risk Species section lacks plan components explicitly aimed at promoting the viability of these species through climate adaptation efforts.

The protection of Forest Service lands within our County is integral to our health, climate, economy, ecosystems, and wildlife. At this time we cannot support Alternative B. We see Alternative D as a workable alternative to be further refined and guide the next iteration of alternatives in the release of the Final Environmental Impact Statement. We strongly encourage you to seek the best available science for integrating Climate Change into an Alternative and the recommendations above integrated into the Draft Record of Decision.

Thank you for your inclusivity and we look forward to our continued partnership through this process.

Sincerely,

San Miguel County, Colorado Board of Commissioners