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Comments: [ATTACHMENT COPIED BELOW]

[Letter #7512 contains this as an attachment. This CARA letter was created for coding of the second attachment.]

[Submitted July 16, 2021 during the cooperating agency review of the Draft Plan and Draft EIS.]

Thank you for the opportunity to provide feedback before a public release of the Draft Forest Plan. The San Miguel, Ouray, Gunnison, and Hinsdale Counties Boards of County Commissioners (BOCC) appreciate the additional time and innovative opportunities made available to cooperating agencies to participate in the Forest Plan revision. We also appreciate your active collaboration with GMUG counties to date.

We appreciate the amount of time you and your team spent to develop this Plan and the thoughtful consideration of our input. 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 pre-Draft and Preferred Alternative B do not adequately recognize these complexities. We ask that the following recommendations be included in order to better prepare for managing our forest into the future.

Draft Forest Plans are supported by a Draft Environmental Impact Statement (DEIS), which analyzes the potential impacts from the preferred and range of alternatives. These documents together reflect an interdisciplinary team approach in consideration of the input received and the directives associated with the 2012 planning rule.

Unfortunately, at this time we cannot support the pre-Draft plan and Preferred Alternative B as presented. We are ready to continue our active collaboration with you and the planning team to reconsider the analysis that will ultimately support a Draft Preferred Alternative that all GMUG counties can support.

As you requested, we are sharing the following comments with our common 'red flag' issues as well as individual county comments from those who choose to do so. These comments were discussed and supported across four counties of the GMUG in opposition to the Preferred Alternative and this entire Draft Plan.

We have four main areas of concern; 1. Lack of sufficient climate change analysis specifically the carbon sequestration and water storage capacity of intact ecosystems, 2. Lack of socioeconomic analysis that considers the multiple uses of the forests including recreational opportunities and ecosystem services benefits, 3. A significant increase in suitable timber, which is a designation that interferes with consideration of responsible management of the forests that allow uses other than timber production and the lack of a timber management analysis that prioritizes wildfire mitigation to protect critical infrastructure including watersheds, and 4. Lack of adequate consideration of the designations in the CORE Act and the proposed GPLI.

According to Subpart A - National Forest System Land Management Planning (USFS Planning Rule) intends to 219.1 (b) "sustain the multiple use of its renewable resources in perpetuity while maintaining the long-term health and productivity of the land. Resources are managed through a combination of approaches and concepts for the benefit of human communities and natural resources. Land management plans guide sustainable, integrated resource management of the resources within the plan area in the context of the broader landscape, giving due consideration to the relative values of the various resources in particular areas." 219.1 (c) "guide the collaborative and science-based development, amendment, and revision of land management plans that promote the ecological integrity of national forests and grasslands and other administrative units of the NFS. Plans will guide

management of NFS lands so that they are ecologically sustainable and contribute to social and economic sustainability; consist of ecosystems and watersheds with ecological integrity and diverse plant and animal communities; and have the capacity to provide people and communities with ecosystem services and multiple uses that provide a range of social, economic, and ecological benefits for the present and into the future."

All of the purposes listed above depend on the appropriate adaptation to a rapidly changing climate. The last GMUG Forest Plan was approved almost 40 years ago. While the human demand for a broad range of traditional and novel uses is increasing dramatically on the GMUG and surrounding lands, the impacts from a rapidly changing climate are only beginning to be understood and must be thoroughly considered by any planning process.

1. Carbon Sequestration

According to this 2017 study, Carbon Sequestration in Colorado's Lands: An Integrated Spatial & Policy Analysis, "Colorado's lands currently hold 3,334 MMT CO₂eq, compared to the US total of 48,382 MMT CO₂eq. In addition, Colorado's lands can be managed to make a significant contribution toward state climate goal of reducing statewide greenhouse gas emissions by more than 26% by the year 2025, compared to 2005 levels (or a cumulative decrease of roughly 39 MMT CO₂eq greenhouse gas emissions from the current level of 130 MMT CO₂eq). Land management decisions have high potential to impact atmospheric concentrations of carbon. Different land use practices contribute to either greenhouse gas emissions or carbon sequestration. Knowledge of current carbon stocks in different land cover types and the impacts of land management practices on carbon sequestration is critically important to land use decision-making. Understanding land cover change trends and projecting those into the future can also help guide future land use decision-making."

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.

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."

Section 219.5 of the Forest Planning Rule states that "the responsible official shall consider and evaluate existing and possible future conditions and trends of the plan area, and assess the sustainability of social, economic, and ecological systems within the plan area, in the context of the broader landscape ([sect] 219.6)." A 2018 USGS Scientific Investigation Report titled Federal Lands GHG Emissions and Sequestration in the U.S. 2005-2014 is available for your consideration. An extremely generalized summary of the findings is that carbon emissions and sequestration on our federal lands were in a delicate balance at the time of the report. This would indicate that any additional emissions resulting from the management of federal lands, including the GMUG should strongly consider, if not require, an equal or greater management objective to add sequestration capacity. The Forest Planning Rule also states in section 219.7 that "A plan may include goals as plan components." Counties are facing mounting costs to prepare for extreme weather events and mitigate impacts from a changing climate for our infrastructure and communities. With more opportunities on our surrounding federal lands for mitigation through healthy ecosystem service benefits including carbon sequestration capacity, we are becoming more dependent on the management of our federal lands. The 2012 Planning Rule requires a carbon assessment prior to plan development or revision 219.6 (b) (4). The GMUG National Forest REVISED DRAFT Forest Assessments: Carbon March 2018 Report states that "the GMUG contains the most sequestered carbon of any National Forest, which is expected because it is the largest unit in the Region. Total forest ecosystem carbon on the GMUG is approximately 130 teragrams (Tg), or 143,300,000 short tons, equivalent to 525,000,000 tons of

carbon dioxide." It also shows an approximately 5 (Tg) loss between 2005 and 2013.

In addition to the baseline analysis, we request that a Monitoring section for Carbon Sequestration be added using the baseline information from the reports quoted, and a requirement for ongoing analysis at the project scale level with a goal of increasing the net carbon storage capacity for the GMUG as quickly as possible. We are ready to support your efforts to include this important analysis and monitoring in the plan and appreciate your leadership on this vital shared responsibility.

This request supports DEIS Pg. 6 "Maintain or restore ecological integrity; air, soil, and water; and riparian areas, taking into account stressors such as wildland fire, insects and disease, and changes in climate. Key issues and needs to address include: Provide direction for ecosystem-based management at a landscape scale, and emphasize maintenance and restoration of ecosystem function and natural processes to improve resiliency. Consider plan direction that takes into account a changing climate, including adaptive responses to impacts of climate change (such as more frequent and larger disturbance events). Focus on maintaining ecosystem resiliency to continue to provide multiple uses and ecosystem services."

As we face what we now know as a more permanent drought condition in the southwest, a desired condition of all management decisions must be to adequately analyze the current capacity for natural water storage of a landscape and the proposed projects' ability to improve that natural capacity over time.

2. Socioeconomic Analysis and Management for increasing Recreation Demands

The Draft Plan and preferred alternative must offer a more comprehensive socioeconomic analysis. Our forests must be managed for multiple uses and many if not all of our communities are facing increasing demands for a wide spectrum of recreational opportunities. Human-powered outdoor recreation is a major economic engine on the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG).

In 2018, the Outdoor Alliance commissioned a series of new economic studies, measuring the economic impact of outdoor recreation in the region. Researchers found that outdoor recreation in the Grand Mesa, Uncompahgre, and Gunnison National Forests generates \$392 million in annual spending on paddling, climbing, hiking, snowsports, and mountain biking [mdash] while also supporting local jobs and attracting both businesses and residents to Colorado.¹ [<https://www.outdooralliance.org/gmug-economic-reports>]

According to Mary Wagner, Associate Chief of U.S. Forest Service, "Outdoor recreation is by far the single greatest use of the National Forest System, dwarfing every other use. Not surprisingly, it is also the single greatest employer, and it provides the single greatest stimulus for local economies. Our public lands provide local and state economic benefits from the various activities on the National Forest System, including outdoor recreation, but also from investments in recreational infrastructure and in healthy, resilient forests and grasslands. In fiscal year 2011, all activities combined contributed over \$36 billion to America's gross domestic product, supporting nearly 450,000 jobs."² [<https://www.fs.usda.gov/speeches/outdoor-recreation-national-forest-system>]

The Draft Plan addresses Socioeconomics desired conditions on page 17 in a more balanced approach. The Draft Plan recognizes the importance of clean water and air and commodities; all things forest wide contributing to the social and economic wellbeing of the local communities. Our concern is the primary focus of this Draft is on timber production, a single industry at the expense of all other uses and economic benefits that the forest provides. The socioeconomic analysis should include recreation and ecosystem services in order to make more thoroughly informed management decisions.

3. Suitable Timber

We support a responsible timber production program that contributes to Forestwide desired conditions and multiple use goals, such as providing mosaics of habitats for wildlife species, managing fuels, and contributing to the economic sustainability of local communities. This must be balanced with other forest uses. Wildfire mitigation projects do not need a special designation such as suitable timber and can occur on any forest lands outside of Wilderness.

We strongly oppose the substantial increase of suitable timber proposed in this pre-Draft Plan. The implementation of SBEADMR has made it clear that even with a ten-year programmatic NEPA decision, the industry is not able to support a large increase in timber production and the timber production is all centered around one business with several partner businesses. During negotiations for the CORE Act, Suitable Timber was a major obstacle to designating lands for uses other than timber production. Even with broad stakeholder support from surrounding communities and the recognition of the low probability for timber production from landscapes proposed for designations in the CORE Act, a single industry was able to impede the progress of the widely supported and economically beneficial protective designations proposed. Following the new ecological emphasis required by the 2012 Planning Rule, if suitable acreage increases and therefore the potential for more timber sales, the protections of ecological systems wildlife and the recreation opportunities that are a growing economic benefit for surrounding communities must be enhanced to prevent long-term damage to these important roles, functions and uses of the forest lands.

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.

4. CORE Act & GPLI (The CORE & GPLI comments are exclusively from Gunnison, San Miguel and Ouray Counties)

The GMUG specific Wilderness, Special Management and Mineral Withdraw designations included in the CORE Act is 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.

The Gunnison Public Lands Initiative (GPLI) is also a result of lengthy collaboration, negotiation and compromise and the designations and land use proposed in the GPLI must be included in the Preferred Alternative.

Summary

We must continue to work together across all GMUG counties and communities to find common ground as we look ahead to the challenges we will face managing our public lands. According to a USFS press release on May 27, 2021 "New data shows more people than ever visited national forests and grasslands last year, according to a Forest Service report released today. National forests and grasslands received 168 million visits in 2020 - an increase of 18 million when compared to 2019. The report, compiled by the Forest Service's National Visitor Use Monitoring program, shows the steepest increase in visits happened between May and October of 2020. Dispersed recreation sites and wilderness areas saw the most significant increases, with an estimated 25% increase in visitation overall. Visits to those areas surged even higher in the summer months of 2020 when compared to 2019."³ [<https://www.fs.usda.gov/news/releases/new-data-shows-visits-soared-across-national-forests-2020>]

Neighboring White River National Forest Supervisor Scott Fitzwilliams stated to the Colorado Sun, "If things keep

growing the way they are, it's inevitable that some of these areas are going to have to have some management scenarios, either permits or reservations or some sort of those types of tools, it's just the way it is. The old days aren't here anymore. In the old days, there were more staff and resources.", Since he started at White River National Forest 11 years ago, his budget has plunged 45%. The busiest National Forest serves as a microcosm for broader cuts to the U.S. Forest Service over recent years. "We're hitting a point where we can't keep going down while the use (of lands) and output keeps going up." 4 [<https://coloradosun.com/2021/01/10/colorado-public-lands-coronavirus-toll/>]

We cannot ignore the GMUG's popularity when it comes to summer and winter recreation. It is imperative we have the tools to plan responsibly for the increasing demands of recreation and prepare for new and quickly changing technologies allowing for easier access to our National Forest, while allowing ourselves the flexibility to adapt to changing natural conditions. We ask that you consider the high level points we shared to revise this plan with a more scientific, responsive and adaptive management approach to the GMUG National Forest. As presented we cannot support the Draft Plan, but welcome the opportunity to work with you and other GMUG counties to develop a Plan that we can support.