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First name: Amber
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Organization: Mesa County
Title: Sr. Managing Analyst
Comments: October 30, 2023

United States Forest Service
Grand Mesa, Uncompahgre and Gunnison National Forests Headquarters
Chad Stewart, Forest Supervisor
2250 South Main Street Delta, Colorado 81416

RE: Grand Mesa, Uncompahgre and Gunnison National Forests Revised Land Management Plan and Final Environmental Impact Statement Objection (GMUG National Forests Plan)

To be submitted electronically via the project website: http://www.fs.usda.gov/goto/gmug/forestplan_objections

Dear Mr. Stewart:

Thank you for allowing Mesa County the opportunity to have been deeply involved in the development of the Environmental Impact Statement ("EIS") and Revised Land Management Plan ("LMP") for the Grand Mesa, Uncompahgre and Gunnison National Forests ("GMUG") as a cooperating agency. The process has been well orchestrated by the US Forest ("USFS") staff and has provided cooperating agencies the opportunity to participate in crafting a plan that balances forest health, wildfire mitigation, and continued access to forest products with the ever-increasing use of public lands for recreation and solace.

Mesa County appreciates that the Revised LMP recognizes a visionary perspective emphasizing the significance of "a landscape of resilient, climate-adapted ecosystems sustaining ecosystem services and balanced multiple-use opportunities far into the future." Our fundamental belief is in the responsible management of our public lands, prioritizing continued availability for a wide range of uses, rather than exclusive preservation.

This principle of accessibility for all forest users is bolstered by the fact that the proposed Wilderness Areas in Mesa County, as assessed in Alternative D, are not part of the GMUG's recommendations at this time. Mesa County values this decision because it ensures that these areas will remain open and accessible to a diverse spectrum of users. Additionally, the continued allowance for active management practices, such as wildfire mitigation and watershed restoration, underscores the commitment to the responsible stewardship of these lands. This approach strikes a balance between conservation goals and the practical needs of our community, fostering the sustainable and harmonious coexistence with our invaluable public lands.

Regarding the determination of Coal Unsuitability in Mesa County, we recognize, as identified in the Coal Screening and Unsuitability Analysis, future coal development may be limited or prohibited by a multitude of other regulations. Mesa County echoed concerns presented by Delta County in our letter dated November 22, 2021:

Minerals: Nonrenewable Energy and Minerals (Draft EIS, Volume 1, Page 323-324):
"Coal production and use in power generation is expected to continue to decline during the plan horizon for various reasons, including climate change... Historic locatable mineral mining in the GMUG has included gold, silver, copper, uranium, molybdenum, and other minerals with unique properties primarily in Gunnison, Ouray, San Juan, and San Miguel Counties. At present, there is no active production for locatable minerals occurring in the GMUG, and current trends do not indicate an increased in proposed production during the planning period."

1. With increasing demand for and scarcity of domestic sources of Rare Earth Elements ("REE") for batteries,

solar panels, and other renewable sources, the GMUG needs to acknowledge this new demand as noted by both the Department of Energy and the Department of Commerce.
2. Coal and coal byproducts can be a source of REE; further, coal for power generation can bridge gap during waning periods of renewable sourced power.
3. The Office of Fossil Energy & Carbon Management ("FECM") funds the National Energy Technology Laboratory ("NETL") Feasibility of Recovering Rare Earth Elements Program which focuses on developing technologies for the recovery of rare earth elements and critical minerals from coal and coal-based resources.
4. GMUG must streamline permitting and review processes related to developing leases, enhancing access to critical mineral resources, and increasing discovery, production, and domestic refining of critical minerals.
5. The Plan should acknowledge, identify areas with REE potential in coordination with BLM and United States Geologic Survey ("USGS") expertise, develop appropriate land use plans, and include provisions for coal leasing in areas that recoverable coal reserves are present in this plan horizon. Designating additional wilderness and restrictive special management areas will hinder the access to these critical minerals.
6. As with other multiple use USFS resources and land uses, the GMUG Plan needs to identify areas of suitable and unsuitable locations for renewable energy projects. Criteria that could be included in determining the locations include geologic instabilities, steep slopes, forest and soil health parameters, existing uses, wildlife concerns, view sheds, existing permit holders, and existing and planned recreation activities. As with mining, timber, recreation, and other forest uses there are areas that would be incompatible for renewable energy projects. Identification of those areas should follow significant public input and be included in this plan horizon.

Given the changing landscape of energy production, evolving technology, increased demand for reliable energy sources, and growing geopolitical instability, we believe it is imperative that any and all energy resources remain viable to future development. It is crucial to consider a broader perspective and remain adaptable to the evolving energy needs of the region and country. If and when the USFS is approached about development of these resources, we strongly encourage you to consent to authorizing lease applications thus ensuring a significant source of employment and economic stability for western slope communities and continued energy security for the United States.

Formal Objection

While acknowledging that the plan developed by the USFS is well balanced and will provide important opportunities for recreation, continued grazing, and allow for future management and conservation of important resources, we continue to have concerns. regarding two areas of the LMP: Wildlife Management Areas and Leasables - Energy and Mineral Resources Including Oil and Gas, Coal, Geothermal, and Others.

Mesa County respectfully submits this objection regarding the Grand Mesa, Uncompahgre and Gunnison National Forests Revised Land Management Plan and Final Environmental Impact Statement published in Grand Junction Daily Sentinel on August 30, 2023. In accordance with 36 CFR 219.54(c):

Objectors name, address, telephone, email address and identification of lead objector:

Objector's Name: Mesa County, Colorado
Objector's Representative: Cody Davis
Address: PO Box 20,000
Grand Junction, CO 81502
Email Address for Correspondence: Cody.Davis@mesacounty.us
Phone Number: (970) 244-1800

Objector's Name: Mesa County, Colorado
Objector's Representative (Lead): Amber Swasey
Address: PO Box 20,000

Grand Junction, CO 81502
Email Address for Correspondence: Amber.Swasey@mesacounty.us
Phone Number: (970) 244-1762

Name of plan revision being objected to: Grand Mesa, Uncompahgre and Gunnison National Forests Revised Land Management Plan and Final Environmental Impact Statement

Responsible official: Chad Stewart, GMUG Forest Supervisor

Statement of issues and/or parts of the plan revision to which the objection applies

Mesa County's concerns include the following sections of the LMP:
*Wildlife Management Areas (MA 3.2) & Wildlife Management Area/CO Roadless Area (MA 3.2/3.1)
*Leasables - Energy and Mineral Resources Including Oil and Gas, Coal, Geothermal, and Others

Wildlife Management Areas (MA 3.2) & Wildlife Management Area/CO Roadless Area (MA 3.2/3.1).

The Desired Condition for MA3.2 states: "Large blocks of diverse habitat are relatively undisturbed by route and associated recreational use, providing security for the life history, distribution, migration, and movement of many species, including big-game species. Habitat connectivity is maintained or improved as fragmentation by routes is restricted." The Standard for this management area description states "there shall be no net gain in system terra routes, both motorized and non-motorized, where the system terra route density already exceeds 1 linear mile per square mile, within a wildlife management area boundary. New trail development within a wildlife management area unit should concentrate near existing development and avoid large blocks of unfragmented habitat to the extent feasible."

As mentioned in our comments provided to the BLM for the Preliminary Draft Revised Land Management Plan, submitted on May 20, 2019:

Wildlife & Biological Concerns:
1. FW-GDL-SPEC-83 (pg. 25) - This guideline suggests that no disruptive activities should be authorized in big game severe or critical winter range or in production areas. The language is not clear as to whether the restriction applies only to the winter use of the areas, or to the use of these areas generally. In addition, the blanket restriction does not allow for a more nuanced, project-specific consideration of impacts and potential minimization/mitigation measures. In general, the Board is not in support of management prescriptions that apply universal restrictions on development, with no opportunity to consider mitigating factors.

And further on the Draft Resource Management Plan ("DRMP") in a letter to the BLM dated November 22, 2021 via https://cara.ecosystem-management.org/Public//CommentInput?Project=51806, letter ID 51806-3965-7498.

Rangeland, Forage, and Grazing, (bullet 7):
The broadly-mapped "wildlife corridors" could be used to curtail a wide range of uses, including grazing, on large parts of the landscape. Reducing permit numbers and/or allotment time should not be the direction provided as an initial tool when working to reduce the direct contact between bighorn sheep and domestic sheep. Additionally, the specific language refers to pack goats and domestic sheep as solely responsible for the long-term viability of bighorn sheep which is not accounting for all of the other influences that also are currently impacting the health of the bighorn sheep.

Mesa County has concerns regarding the substantial amount of land (about 46%, approximately 217,000 acres) under USFS management in the county earmarked as Wildlife Management Areas and the potential ramifications associated with a broad-brush approach to defining these areas. When coupled with the Wildlife Management

Area/CO Roadless Areas, the extent of lands under wildlife restrictions increases to 58%. This allocation creates constraints on the possibility of future road and trail development, potentially limiting responsiveness to evolving opportunities. We also wonder if this management application could be used in the future to further limit access or use of these areas.

Mesa County also questions if mapping current wildlife areas limits the USFS to management restrictions in those areas should conditions on the ground change dramatically? Are the maps able to be updated administratively or will it need to be done during an RMP amendment? Additionally, we seek clarity on whether a policy or procedure exists to ensure that USFS maps align with Colorado Parks and Wildlife ("CPW") maps. By maintaining accurate and updated maps, both agencies can make well-informed decisions regarding disturbance thresholds and ensure that future road and trail projects are not unfairly denied.
While acknowledging the importance of safeguarding connectivity corridors for species, we question if layered management truly enhances their protection. The 2012 Colorado Roadless Rule ("CRA") underscores the multifaceted role of roadless areas, serving as sources of drinking water, crucial fish and wildlife habitats, semi-primitive or primitive recreation sites, and natural landscapes for various recreational activities. Further CRA's "recognize that timber cutting, sale, or removal and road construction/reconstruction have the greatest likelihood of altering and fragmenting landscapes, resulting in immediate, long-term loss of roadless area characteristics. Therefore, there is a need to generally prohibit these activities in roadless areas." As the CRA designation already offers comparable protection by generally prohibiting new and reconstructed road projects, Mesa County believes that Wildlife Management Areas should be removed from areas already safeguarded by the CRA.

Leasables - Energy and Mineral Resources Including Oil and Gas, Coal, Geothermal, and Others
In the April 2019 draft of the LMP, the Leasable Minerals and Energy Resources including Oil and Gas, Coal, Geothermal, and Others section contained an Objective that stated "FW-OBJ-ENMI-171: Within 3 years of plan approval, revise oil and gas leasing analysis to identify lands open or closed to oil and gas leasing."

Mesa County submitted comment on May 5, 2019 encouraging the USFS to complete the new assessment as soon as possible given the importance of the extractive industry to western Colorado.

5. FW-OBJ-ENMI-171 (pg. 38) - The Plan proposes to revise oil and gas leasing within three (3) years. The Board supports the goal of completing the revision as quickly as possible, to provide regulatory and operational certainty to oil and gas operators and to encourage investment in local energy resources.

In the August 2023 LMP, this Objective has been removed and now contains language under a Standard that states there will be a moratorium until a new decision is issued. While we understand that conducting a Forest wide suitability analysis for oil and gas leasing is outside of the scope for this plan revision, we continue to believe that the assessment should be completed within the original 3-year time frame rather than an unidentified period under a moratorium. We ask that the USFS identify a time frame that this activity will be completed.

Conclusion

In closing, Mesa County values the forward-thinking approach reflected in the Revised LMP, which places emphasis on resilient ecosystems and the balanced coexistence of multiple-use opportunities. We commend the USFS for crafting a plan that prioritizes active management practices, including wildfire mitigation and watershed restoration, while also guaranteeing sustained accessibility to forest products for the economic well-being of our communities. This plan underscores the importance of continued access for recreation, the conservation of critical environmental resources such as air, water, soil, and vital species, all of which collectively contribute to the invaluable resource that is the GMUG.

Your thoughtful consideration and ongoing collaboration in addressing our concerns about Wildlife Management Areas and Energy and Mineral Resources Leasing, as we collectively work towards responsible management of

our shared public lands, are greatly appreciated.
Sincerely,

Cody Davis
Commissioner

cc: Peter Baier, Mesa County Administrator
Todd Starr, Mesa County Attorney

1 United States Department of Agriculture, US Forest Service. (2023, August). Grand Mesa, Uncompahgre, and Gunnison National Forests Revised Land Management Plan, Pre-Objections Version (p. 8). Retrieved August 2, 2023, from https://usfs-public.app.box.com/s/1zlkqbb7ybq6dytiqrate23qjog9qoz6/file/12952472296.
2 United States Department of Agriculture, US Forest Service. (2023, August). Grand Mesa, Uncompahgre, and Gunnison National Forests Revised Land Management Plan, Pre-Objections Version (p. 118). Retrieved August 2, 2023, from https://usfs-public.app.box.com/s/1zlkqbb7ybq6dytiqrate23qjog9qoz6/file/12952472296.
3 U.S. Forest Service. (2023, July 3). Special Areas; Roadless Area Conservation; Applicability to the National Forests in Colorado (77 FR 39576, pp. 39576-39612). 36 CFR 294. RIN: 0596-AC74. Document Number: 2012-15958.
4 US Forest Service. (2019). Grand Mesa, Uncompahgre, and Gunnison National Forests Preliminary Draft Revised Land Management Plan (p. 38).