

Data Submitted (UTC 11): 8/20/2019 6:00:00 AM

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Title:

Comments: GMUG Working Draft of the Revised Land Mang. Plan June 2019

Please see the attached GMUG Working Draft of the revised Land Mang. Plan June 2019 document for the Forest Plan Revision #518086.

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August 20, 2019

BOARD OF COMMISSIONERS

HILARY COOPER

KRIS HOLSTROM

LANCE WARING

Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG) Attn: GMUG Planning Team

2250 South Main Street Delta, CO 81416

Transmitted via Email to gmugforestplan@fs.fed.us and samantha.j.staley@usda.gov

RE: San Miguel County, Colorado, feedback on: Grand Mesa, Uncompahgre, and Gunnison National Forests

Working Draft of the Revised Land Management Plan June 2019 document for the Forest Plan Revision #518086 (hereafter, [ldquo]WDRLMP[rdquo])

Dear GMUG Planning Team,

Thank you for the opportunity to provide feedback and for your patience as we took extra time to thoughtfully and thoroughly develop our comments on this phase of the Forest Planning.

The San Miguel County Board of County Commissioners (SMC BOCC) appreciates the additional and innovative opportunity made available to cooperating agencies and the public by the release of the WDRLMP. We also appreciate the helpful webinars, interactive ArcGIS Storymaps, and open houses in communities around the GMUG with USFS specialists. We continue to appreciate the opportunity to participate in the forest plan revision process as a Cooperating Agency.

According to SubPart A - National Forest System Land Management Planning (USFS Planning Rule) intends to 219.1 (b) [ldquo]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.[rdquo] 219.1 (c) [ldquo]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.[rdquo] All of the purposes listed above depend on the appropriate adaptation to a rapidly changing climate. 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 yet must be thoroughly considered by any planning conducted for our USFS lands. The majority of our comments below are submitted with special consideration for the Forest Plan language mentioned above.

Section 219.5 of the Forest Planning Rule states that [ldquo]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).[rdquo] A 2018 USGS Scientific Investigation Report titled Federal Lands GHG Emissions and Sequestration in the U.S. 2005-2014¹ 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 [ldquo]A plan may include goals as plan components.[rdquo] San Miguel County is facing mounting costs to prepare for extreme weather events and mitigate the expected impacts from a changing climate on 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 National Forest and Grasslands to conduct a carbon assessment prior to plan development or revision 219.6 (b) (4). The GMUG National Forest REVISED DRAFT Forest Assessments: Carbon March 2018 Report² states that [ldquo]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.[rdquo] It also shows an approximately 5 (Tg) loss between 2005 and 2013. We request that a Monitoring section for Carbon Sequestration be added using the baseline information in this report and requiring 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 deeply appreciate your leadership on what we consider this vital shared responsibility.

We applaud the recognition in this new Planning Rule of the important role of ecosystem services on USFS lands. In addition, we are well aware of the growing demand for more

1 <https://pubs.usgs.gov/sir/2018/5131/sir20185131.pdf>

2 https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd573532.pdf

recreational opportunities on our USFS lands. As we understand it, the current revenue sources for the USFS off the GMUG, are tied mainly to timber, grazing and special use permits. The USFS management of these operations are subsidized in many, if not most cases on the GMUG. Due to lack of adequate funding to the GMUG and other National Forests around the U.S. counties and municipalities are being asked to partner financially to ensure responsible management of our public lands. In order to move into a more responsible business model the USFS should move toward placing a value on the ecosystem service benefits produced by USFS lands and the increasing recreation uses. We recognize the socio economic benefits from timber, grazing and special use permits to surrounding communities and support their related Monitoring questions. We would all benefit by gaining a better understanding of the values of and potential revenue sources from ecosystem services and recreation opportunities and impacts. We request that the GMUG take a leadership role to add Monitoring questions to generate specific feedback with a goal of increasing the revenue opportunities from these important values.

There are multiple sources of data available to start to develop this information including

Outdoor Alliance[rsquo]s The Economic Influence of Human Powered Recreation in Colorado's Grand Mesa, Uncompahgre, & Gunnison National Forests³, the Forest Resilience Bond programs of the Blue Forest Conservation, the existing partnership between the GMUG and Wild Turkey Foundation etc.

The following feedback is organized around Geographic Areas, Plan Sections, Specific Resources, Management Area Direction, and Monitoring Direction included in the WDRLMP.

GEOGRAPHIC AREAS

1. Ophir

a. SMC BOCC support the Town of Ophir's interest in ensuring that there is no over the snow motorized uses in the eastern portion of Ophir valley. The WDRLMP appears to be accomplishing this by changing the semi-primitive motorized winter ROS (north and east of Ophir) to a semi-primitive non-motorized winter ROS. We support this change.

b. SMC BOCC support semi-primitive non-motorized summer ROS within the "Ophir Valley" Special Management Area of the San Juan Mountains Wilderness Act (SJMWA) which is incorporated into the Colorado Outdoor Recreation and Economy Act (CORE Act). This will allow for the carefully negotiated bicycle access on existing routes and administrative access as needed on existing

roads. We request that the delineated area between non-motorized and motorized be refined, to establish non-motorized access only after the existing Waterfall Canyon, Swamp Canyon, Carbonero (Blixt Road/Trail) and Chapman Gulch gates. The non-motorized access beyond these gates has been refined and

3 <https://www.outdooralliance.org/gmug-economic-reports>

negotiated for years by the Ophir community. We strongly support the confirmation of this locally supported land use and keeping the gates locked.

c. The WDRLMP includes the Ophir Needles Special Interest Area (SIA), which includes multiple ROS classes for summer and winter. We support the Town of Ophir's objective to protect the unique geological and scenic resources, while still allowing public access and rock climbing. The nearest roads are the Alta Lakes Road, which cuts through the northwestern corner of the SIA and the Ophir Road, south of the SIA and parallel to the southern SIA boundary. The summer and winter ROS should be carefully examined and retain the summer and winter ROS for the current access, hiking and rock climbing use.

d. The USFS should incorporate the most robust possible source water protections

by incorporating clear and measurable source water protection standards for all

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source water protection areas within the forest and San Miguel County . The

WDRLMP should incorporate explicit activity and project buffers for the Town of Ophir's water supply, a

mix of ground and surface water, to ensure that if surface water must be used to augment groundwater sources, it is not vulnerable to impacts from humans or livestock. We request that a monitoring question be added to Table 9 of the WDRLMP that triggers monitoring for degradation of source water quality due to forest activities or projects in community source water protection areas and appropriate immediate corrective management actions if needed.

2. Special Management Areas Identified in the San Juan Mountains Wilderness Act (SJMWA) and CORE Act

a. Please re-examine the summer and winter ROS and Management Area category for lands within the Liberty Bell East Special Management Area, Liberty Bell Corridor Special Management Area, Sheep Mountain Special Management Area and Naturita Canyon Mineral Withdrawal Area. Where these lands are not already Colorado Roadless Areas, the WDRLMP puts them primarily in the General Forest Management Area, which may not guarantee protection or preservation of the characteristics they possess. The Sheep Mountain SMA, Liberty Bell SMAs and Naturita Canyon areas were designed and supported by a decade-long, robust public dialogue to preserve natural landscapes and processes, but allow for existing uses that may conflict with Wilderness, such as heliskiing, mechanized trails or an organized trail race. Please consider creating sub categories of Management Areas either under Wilderness or Special Designations for these special areas which are currently under consideration by Congress.

4 <http://hermes.cde.state.co.us/drupal/islandora/object/co%3A26568> - Index of and links to Source Water Assessment Reports by CDPHE for communities and facilities within San Miguel County.

3. Wild and Scenic Rivers

a. SMC BOCC's comments submitted to the GMUG on March 20, 2018 (see attached) asked for consideration of segments previously identified as eligible and/or recommended by CPW for a fish Outstanding Remarkable Value (ORV), specifically;

i. recommendation of a finding of eligible with a fish ORV for Elk Creek (near Telluride), East and West Forks of Deep Creek (near Telluride), and Fall Creek and its tributary Muddy Creek (upstream of Woods Lake),

ii. inclusion of Ingram Falls in the Eligibility Evaluation and report, with a finding of eligible for an ORV of scenery and a preliminary classification of Recreation,

iii. inclusion of Bridal Veil Falls in the Eligibility Evaluation and report, with a finding of eligible for the scenery, recreation and historical ORVs and a preliminary classification of Recreation,

iv. inclusion of an approximately 1-mile long segment of Beaver Creek extending south from the GMUG/BLM boundary to the confluence with West Beaver Creek in the eligibility report and found eligible with a similar vegetation ORV as the segment flowing through the adjacent BLM land.

b. The Desired Condition and Management Approach for Wild and Scenic Rivers found eligible should

include: retention of free-flowing status, water quality, outstandingly remarkable values and their classifications. Any projects that have the potential to affect a river's free-flowing character will be evaluated as a water resource project (Forest Service Handbook 1909.12, 82.51(8) Wild and Scenic River Evaluation-Wildlife and Fish Projects). Projects that affect the

free-flowing characteristic of an eligible river would have to make a wild and scenic river eligibility determination before the project could proceed.

PLAN SECTIONS

CHAPTER 1. Introduction

1. We recommend the following addition to the What is a Forest Plan? section - "Forest plans provide the vision and strategic direction to move a national forest toward ecological, social and economic sustainability and maintain or enhance the resiliency of a landscape to adapt to a changing climate and other anticipated or unanticipated conditions." Sustainability and resilience (aka resiliency) are harmonious but are not the same. Sustainability suggests using resources in a manner that does not completely deplete them and allows them to remain a functioning system into the long-term

future. Resilience is the ability to bounce back after disturbance or disaster. We can learn about resilience from the ongoing monitoring of natural systems and altered

landscapes, then selectively promote resilience in areas where natural and manmade disturbances such as wildfire, flood, drought or disease are anticipated. The WDRLMP highlights the need for resilient infrastructure. With a rapidly changing climate management of all activities, including and especially the ecological services on the GMUG should consider or require currently established best management practices for promoting resilience.

2. Acknowledge the intrinsic value of natural landscapes, functioning ecosystems and environmental quality to both humans and non-humans.

a. The Forest Plan Vision, Roles, and Contributions section of the WDRLMP (pg 8-9) discusses a shared vision of a "landscape of resilient ecosystems sustaining balanced multiple-use opportunities..." The Vision should continue to be refined throughout the plan revision process to incorporate the concepts of high-quality and natural landscapes, functional and resilient ecosystems, sustainably supporting multiple uses and providing critical ecosystem services and wildlife habitat.

b. Consider moving the discussion of GMUG serving as a critical headwaters to the first paragraph of the Roles and Contributions section. This is a role vs. a characteristic. Similarly, consider moving the last sentence on Page 9, to the Roles and Contributions section (Page 8). Supporting ecosystem services is a role of the forest.

c. The Distinctive Roles and Contributions emphasize "Public Enjoyment" and "Commodity Use and Community Connections." (pg 8-9). Consider adding a reference to

[ldquo]locals and visitors enjoying stargazing and dark skies[rdquo] to the list of year-round recreation opportunities (pg 8 - 1st bullet). Recreation and destination tourism to experience dark skies is increasing on the GMUG and around the world.⁵

CHAPTER 2. Forestwide Direction

1. PART I, FW-DC-SCEC-01 (pg 10): We suggest adding a reference to the high and unique quality of the scenery, recreation and natural landscapes of the GMUG as an essential characteristic that drives tourism and quality of life. Please also include references to clean air and dark skies in this desired condition.
2. FW-DC-PART-01 & EDU-01 (pg 10): Partnerships also strengthen relationships and promote understanding and efficiencies. Academic institutions, collaborative research and stakeholder groups help monitor and assess conditions across the forest and provide the public and GMUG with an increased understanding of the forest.

⁵ For example:

https://www.nationalparksatnight.com/colorado-high-country-2020?utm_source=NPAN+Workshop+Attendees&utm_campaign=c4e467bdfc-2018-alumni-announcement_COPY_01&utm_medium=email&utm_term=0_2ce1a3f512-c4e467bdfc-141797809&mc_cid=c4e467bdfc&mc_eid=7f24af7ba8

Part II: Ecological Sustainability (pg 11+)

1. (AQ) FW-DC-AQ-03 (pg 11): We appreciate the intent to maintain or improve the air quality in areas like Mount Sneffels and Lizard Head Wilderness.
2. Air Quality Guidelines: add a guideline that will cause projects and activities to be designed so that they produce as little emissions (CO₂ and/or methane) as possible using Best Management Practices (BMPs) and effective technologies.
3. (ECO) FW-OBJ-ECO-04 (pg 14) & FW-OBJ-TEV-04 (pg 16), (and all other Objectives with the language [ldquo]within[hellip]10 years of plan approval[hellip][rdquo]): The ten-year threshold is too far into the plan lifespan, expected to be 10 to 15 (plus) years. The identification of potential climate refugia should be identified as soon as possible to be considered for protection. Other objectives should be accomplished within the first 3 to 5 years of the plan[rsquo]s implementation to be useful to the GMUG in adaptive management and for the monitoring and evaluation frequency.
4. Table 2 (pg 15): The Optimal Range of Coarse Woody Debris (tons per acre) should be increased for Spruce-Fir and Spruce-Fir-Aspen to a range of 30-50 based on the latest science team findings and recommendations of the SBEADMR AMG.
5. FW-GDL-ECO-05 (pg 14): Since this is a guideline, which provides GMUG with some discretion, please

change [ldquo]minimize[rdquo] to [ldquo]avoid[rdquo] (adverse impacts to biological soil crusts).

6. FW-DC-ECO-06 (pg 14): Please add another desired condition or add to this one a reference to maintaining or enhancing migration corridors.

7. (RMGD) FW-STND-RMGD-07 (pg 17): Please make a new category for fens (Fen Management Zone) that will not allow their hydrology to be altered or degraded. There should be a standard that requires that there be no disturbance, dewatering, degradation, ditching, damming, 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

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buffer.

FW-GDL-RMGD-15 is a guideline and inadequate to protect fens, in part

because it is a flexible tool to [ldquo]avoid[rdquo] vs. a standard that creates an exclusion zone around the fen and areas that are hydrologically connected.

8. FW-GDL-RMGD-16+ (pg 20): Please add a guideline to state that roads should be engineered and designed to avoid adding sediment to rivers and riparian areas.

9. Please add a water-related Objective to RMGD & WTR to improve water quality in streams listed as impaired or degraded by legacy mine drainage and add Standards to prioritize projects to improve water quality from inactive legacy mine portals by removing tailings from floodplains and other mitigation. Water quality trends should be

6https://www.fs.fed.us/biology/resources/pubs/watershed/groundwater/ground_water_technical_guide_fs-881_march2007.pdf

monitored and the goal should be to improve water quality so that streams are no longer impaired from past mining activities and legacy mine waters from USFS lands.

10. (IVSP) FW-GDL-IVSP-05 (pg 22): Consider reseeding just before the first snow expected to persist through winter. In some ecosystems, this is recommended to allow the snow to drill in and protect the seeds and to help avoid invasive cheatgrass. Currently, this guideline only allows for reseeding during the first growing season.

11. (FFM) FW-GDL-FFM-04: (pg 24): These guidelines seem to be designed for pine dominated forests. Careful

consideration should be made for resiliency of existing or transitional (and less flammable) species like aspen in spruce/fir dominated forests.

12. (SPEC) FW-OBJ-SPEC-03 (pg 25): This objective provides that at least 25,000 to 80,000 of habitat be restored or enhanced within the 10-years following plan approval and that 30 percent of the acreage should be on Wildlife Management Areas. The GMUG is 3.2 million acres. Wildlife Management Areas are proposed to be about 8.8 percent of the GMUG or 278,000 acres. One-third of the habitat enhanced or restored will be within less than 9 percent of the GMUG. The target acreage seems very low, since it may only improve as little as 0.8 percent (<1%) of the GMUG land. By contrast, GMUG is proposing in FW-OBJ-SPEC-10 to maintain, restore, or create 106,000 acres of pollinator habitat. Wildlife habitat restoration to improve general species diversity can be coordinated with other objectives including forest, watershed and vegetation resiliency. The USFS has a willing partner in CPW and local and national partnerships and therefore this acreage should be increased substantially.

13. FW-GDL-SPEC-11 (pg 26): Please consider amending this guideline so that bat-friendly

gates (closures) are designed for any mine closure that is technically feasible for a bat-friendly closure, to allow for the altitude of bat habitat to shift over time.

14. FW-GDL-SPEC-13: [ldquo]Live trees that are prone to windthrow due to their height and canopy density should be removed.[rdquo] seems to contradict the intent to leave large enough clumps for both habitat and protection from windthrow, an objective of fuels and timber management. In terms of meeting habitat needs, live trees should be left on the landscape, please consider removing this sentence.

15. FW-STND-SPEC-15: We support this standard to protect the existing herds of Rocky Mountain bighorn sheep in San Miguel County.

16. At-risk Species (pg 28): With the alarming trend of rapidly increasing species extinction across the planet, we respectfully request that the Regional Forester[rsquo]s list of species of conservation be released with adequate time for thorough consideration by cooperating agencies and the general public.

17. Gunnison Sage-Grouse (pg 29-32): At present there is no known GuSG habitat on forest lands in San Miguel County. We support the comments of Gunnison County specific to this section and again request strong collaboration on the management of this Federally Threatened Species with CPW. The satellite populations of GuSG in San Miguel County are dependent on a healthy and vibrant Gunnison Basin population.

18. Conservation Watershed Network (pg 33): It appears that Woods Lake (Clear Fork Muddy Creek) and Fall Creek have been included for Colorado River Cutthroat Trout. San Miguel County supports this inclusion and requests that the USFS include all other stream segments in the San Miguel River drainage identified by CPW as Colorado River Cutthroat Trout habitat.

19. (PLEO) FW-DC-PLEO-01 (pg 34): We request that paleontological resources are managed to avoid degradation and that any interpretation or public outreach of the resources be performed so that they are not threatened by vandalism. This desired condition would be significantly improved if it acknowledges the importance of paleontological resources

and needs for protection similar to how cultural resources are addressed in

FW-DC-CHR-01 . FW-DC-PLEO-01 would be improved if it contained language like:

[ldquo]Significant, vulnerable paleontological resources may be identified, protected, stabilized, scientifically studied, evaluated, and interpreted. These resources provide geological time markers, insights into past depositional environments and climate history, and are important for tourism.[rdquo]

20. (SOIL) FW-STND-SOIL-01 (pg 34): Existing carbon content and carbon sequestration capacity of soil is a growing area of interest for climate mitigation and natural water storage opportunities. We recommend changing this sentence to read [ldquo]Soil quality and function sustain and enhance ecological processes including water storage and carbon retention.[rdquo]

21. (ENMI) FW-STND-ENMI-02 (pg 39): We appreciate that this is a standard vs. a guideline. However, the standard says that reclamation plans for mined lands will be designed for the land to return to [ldquo]productive uses.[rdquo] The standard should be revised to emphasize that reclamation should be designed to return mined land to a functional condition with contours, ecosystems and landscapes that are as close as possible to the original

pre-disturbance natural landscape and ecosystem or the most proximal natural lands, which would support land uses of similar unmined or undisturbed lands.

22. FW-STND-ENMI-03 (pg 39): Please add that any structures erected to support the permitted mining activity shall be removed during the reclamation phase. Any permanent structures or occupancy that is desired post-mining must be pre-approved for any non-mining uses by the local government having jurisdiction.

23. FW-GDL-ENMI-04 (pg 39): Please strengthen this guideline by specifying that mine reclamation should use a geomorphic approach that results in landforms that are similar to adjacent natural terrain and hydrological function [ldquo]to the greatest degree possible.[rdquo] The rationale for this guideline is not just minimizing long-term monitoring and maintenance, but primarily to restore the naturalness, scenic integrity, ecosystem services and uses which are important to gateway communities and economies in the long-term.

7 https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd642150.pdf; Page 35

24. (INFR) FW-OBJ-INFR-03 (pg 41): With increasing human demands on the GMUG, sign pollution and confusion can be a growing problem. Please consider adding the following: [ldquo]...consistent with the scenic character for the given area and are designed to minimize language and number of signs.[rdquo]

25. FW-GDL-INFR-08: Please consider making this is a standard in order to locate facilities beyond the 100-year floodplain.

26. Transportation System (pg 42): The increasing use of existing trails and the growing demand for more trails are perhaps some of the most immediate issues facing the GMUG and surrounding communities (besides a rapidly changing climate). With this growing demand, we suggest that the GMUG Forest Plan needs a Forestwide (FW) section on trails to provide direction for future planning and summer and winter TMP updates. We feel this direction would also be helpful to provide direction for the increasing use/maintenance of existing system trails. Transportation (TA) seems appropriately focused on roads. Infrastructure (INFR) seems focused

on facilities and structures. Designated Trails (DTRL) could be changed to [ldquo]Trails[rdquo] with a subsection for Designated Trails. Although there may be different site/region specific trail standards, we believe that a set of general Desired Conditions, Objectives, Standards and Guidelines could be developed to ensure appropriate direction for the potential development of hundreds of miles of new trails. And the USFS could help surrounding communities develop a uniform standard of trails. In addition, it would centralize direction for trails in regards to reducing conflicts with ecosystem services, wildlife, soils, etc. As currently written, one would need to refer to multiple sections to understand Forest Plan direction on trails.

27. (TSTN) FW-GDL-TSTN-02 (pg 42): Please also provide proper use of signage where there

not only are roads intended for high-clearance vehicles but also vehicles limited by a maximum width. Strategic signage that will allow vehicles to make travel plans appropriate for their vehicle type, and that does not create conflicts where there are no safe turn-arounds is desired.

28. (LSU) FW-STD-LSU-12 (pg 44) : More protective management area categories should be able to be accommodated if warranted, if there is an existing management area category, even if that special management area category is not adjacent to the land being acquired. This refinement may only be needed when there are larger acreage parcel acquisitions.

29. (RGN) FW-GDL-RNG-08 (pg 45): Please consider making this a standard vs. a guideline. The extreme drought conditions of 2017/18 produced excessive concentration of livestock and big game around fewer persistent water sources caused significant erosion and head-cutting. With dry years becoming more frequent, this should be required.

30. Please consider creating a new guideline after FW-GDL-RNG-15 (pg 46) to place additional temporary stock tanks and wildlife water supplies to alleviate

high-concentration impacts during significant drought periods to reduce land impacts.

31. Recreation (pg 46-48): We support the [ldquo]Plan for Sustainable and Balanced Recreation Opportunities[rdquo] policy recommendations in the Outdoor Alliance GMUG Vision Report8.

32. FW-0BJ-REC-03: This objective should be accomplished within 3 to 5-years of plan approval considering the existing impacts and growing demands on these trailheads.

33. FW-STND-REC-05: Fat biking, which may be considered a type of mountain biking, is growing in popularity and needs to be addressed specifically in winter travel. The Outdoor Alliance GMUG Vision has specific helpful language to define [ldquo]bicycles[rdquo].

34. FW-GDL-REC-08, -09, -11: Please consider elevating these three guidelines to standards.

35. FW-GDL-REC-10: If there are different ROS for winter and summer which will prevail?

36. We support the recommendation of the Outdoor Alliance GMUG Vision to initiate site specific winter TMP[rsquo]s within one year of the FP ROD to bring OSV management in line with the Forest Plan.

37. (SWBY) We appreciate FW-DC-SBWY-01 (pg 52): which has the desired condition to maintain or improve the [ldquo]intrinsic scenic, natural, historical, cultural, archaeological, and recreational qualities.[rdquo] and scenic natural landscapes, that provide the reason for the designation of scenic byways. Since Scenic Byways

and their natural landscapes are essential to tourism and local economies, there should be appropriate standards and guidelines in the plan. However, no standards and guidelines are provided in the WDRLMP. GMUG should add clear standards and guidelines. The vital contribution that scenery adds to the local economies should be recognized by adding a reference here.

38. Mineral exploration and extraction, forest treatments, infrastructure and facilities, obtrusive and overhead rights-of-way, and even grazing and recreation can negatively

impact scenic qualities. A standard for Scenic Byways that is similar to

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FW-STND-DTRL-05, which excludes mineral extraction within the [ldquo]visible foreground,[rdquo]

up to one half-mile of the Continental Divide National Scenic Trail is suggested. We support incorporating a similar standard for the Unaweep/Tabeguache Scenic Byway corridor within San Miguel County if a stronger standard is not already contained in the draft plan.

39. The GMUG revised plan should consider a standard similar to the Shoshone National

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Forest LUP for scenery (Shoshone NF LUP SCEN-STAND-01), [ldquo]Projects in foreground

areas of scenic byways, national scenic trails, or designated wild and scenic rivers shall be designed to meet the scenic integrity objective of at least high.[rdquo] Appendix 4, Table 11

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, of the WDRLMP only mentions that the Scenic Integrity Objective (SIO) of [ldquo]Scenic

Byways (with some exceptions)[rdquo] is otherwise [ldquo]High.[rdquo] It is unclear what the criteria are for the [ldquo]exceptions[rdquo] to managing for an SIO of High. This should be made clear in the

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<https://static1.squarespace.com/static/54aabb14e4b01142027654ee/t/5d443ccd0c50000001730a22/1564753121914/Outdoor+Alliance+GMUG+Vision+FINAL.pdf>:Page15

9 https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd642150.pdf; Page 37

10 <https://www.fs.usda.gov/detail/shoshone/landmanagement/planning/?cid=STELPRDB5199919>; Page 89

11 https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd642150.pdf; Page 154

revised plan. We request that the Unaweep/Tabeguache Scenic Byway corridor intersecting the GMUG within San Miguel County allow for [ldquo]at least high[rdquo] scenic integrity.

40. (TMBR) Timber and Other Forest Products - Suitability (pg 52 - 54): It is clear that the intent of the USFS is to substantially increase the amount of suitable timber acreage in this Forest Plan and depend on site specific analysis to determine the actual suitability of harvest. We believe this presents challenges for landscape scale EIS projects, like SBEADMR, which does not include a formal (NEPA) comment opportunity for

site-specific analysis at the project scale. Following the new ecological emphasis of this forest plan, 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.

41. FW-STND-TMBR-02: An objective of any timber harvest should be to promote resiliency for future forests and the ecosystem services they provide.

42. We also ask that the GMUG place establish a formal prioritization of WUI areas to improve safety and fire mitigation for communities around the GMUG.

43. FW-STND-TMBR-05: This standard says that timber will not be harvested where certain conditions may be irreversibly damaged, [ldquo]as identified in project-specific findings.[rdquo] With respect to finding timber suitability on steeper slopes, real project level analysis that will take a hard look at potential soil, slope, watershed health, and avalanche conditions needs to be guaranteed at the design phase of a project and before the project is approved.

Recreation Opportunity Settings (ROS) in San Miguel County

1. In general, the summer ROS is similar for GMUG lands in San Miguel County to current ROS, however lands west of Naturita Canyon in the McKee and Callan Draws would be changed from Semi-Primitive Non-Motorized to Semi-Primitive Motorized. The final decision to make these changes should involve more feedback from local users.

2. The East Beaver Park and Lone Cone Areas would be changed from Semi-Primitive

Non-Motorized to Semi-Primitive Motorized. This area contains wet meadows and fens and is an important source of surface and ground water for the region. It is also a summer elk concentration area. This ROS change seems to be in conflict with objectives, standards, and guidelines being developed in the WDRLMP to protect water resources and potentially Big Game. We recognize the opportunity to connect existing trail systems through this region, but careful consideration must be made to protect existing ecological systems, while allowing for appropriate recreational uses. If the change to [ldquo]motorized[rdquo] continues, we suggest retaining some of the non-motorized areas with a boundary adjustment.

3. Lands north of the existing Lizard Head Wilderness, including proposed SJMWA wilderness expansion parcels, would be changed from existing Primitive ROS to semi-primitive non-motorized. These lands should be managed to retain a Primitive ROS.

4. Existing Wilderness and lands currently proposed or inventoried with High Wilderness suitability should all be managed as Primitive to retain their wilderness character and primitive nature. It appears from the Storymap application that the existing Lizard Head and Mount Sneffels Wilderness Areas are currently managed

with a mosaic of Primitive and Semi-Primitive Non-Motorized ROS. Existing Wilderness should continue to be managed with a Primitive ROS or restored to a Primitive standard.

5. The Winter ROS for the Whitehouse Area in the SJMWA would be changed from Primitive to Semi-Primitive Non-Motorized. We again request that areas proposed for Wilderness under the SJMWA and CORE Act be classified as Primitive to retain the wilderness characteristics and primitive nature confirmed through the decade-long community effort to build these designations.

6. We support the lands around Telluride and Ophir either retaining a Summer and Winter Semi-Primitive non-motorized or shifting from motorized to non-motorized.

7. We support the areas within the Sheep Mountain SMA proposed in the SJMWA/CORE Act retaining their Semi-Primitive Non-Motorized Winter ROS, but ask that the areas previously classified as Primitive stay Primitive. The Sheep Mountain SMA is drafted in the CORE Act to protect the existing wilderness characteristics while allowing for existing non-Wilderness compatible uses including heli-skiing and mountain biking to continue. There was broad agreement during the stakeholder input from all sides that the existing wilderness characteristics are highly valued and should be protected, which warrants a Primitive classification where appropriate.

8. Unless there are existing motorized uses, buffers around existing Wilderness should be Semi-Primitive Non-Motorized.

9. In general, lands included within the SJMWA should retain the most primitive summer and winter ROS possible and not less than Semi-Primitive Non-Motorized.

10. In general, lands found to meet GMUG wilderness evaluation criteria and having preliminary evaluation ratings of [ldquo]moderate[rdquo] or [ldquo]high[rdquo] should retain the most primitive summer and winter ROS possible and not less than Semi-Primitive Non-Motorized.

11. Potential conflicts between water resources and riparian areas should not be introduced by adding large swaths of motorized ROS.

CHAPTER 3. MANAGEMENT AREA DIRECTION

1. A new designation should be made for areas under consideration by Congress for designation in order to protect the locally valued management recommendations from surrounding communities. They should not be designated into the default category of

General Forest. Specifically the areas that would be designated as Wilderness in the CORE Act should be designated as a [ldquo]Community Recommended Wilderness[rdquo].

2. The other areas including; Liberty Bell East, Liberty Bell Corridor, Ophir Valley Area, and Sheep Mountain Special Management Areas should be considered under Special Areas and Designations and managed similar to wilderness except allowing for any

non-wilderness existing uses such as mechanized trails, heli-skiing, or the Hard-Rock 100 trail race. San Miguel County welcomes the opportunity to further consult or collaborate on developing management area categories and alternatives for the forthcoming draft plan and draft EIS.

3. Areas being evaluated for wilderness should be considered for a management category other than General Forest. East Beaver Creek and Lone Cone possess wilderness characteristics and significance documented in our wilderness evaluation comments. These areas should be included in Management Area 1.2, Wilderness Areas to be Analyzed, in one or more alternatives in the future draft plan and draft EIS.

4. There appear to be very few Wildlife Management Areas, 3.2, in the WDRLMP, and none in San Miguel County. We request that the GMUG consider the significance of big game summer concentration and calving areas, lynx habitat and recommendations for primary and secondary [ldquo]wildlife emphasis areas[rldquo] identified by CPW, which include the East Beaver Park and Lone Cone areas.

5. Objectives, Standards, and Guidelines for Management Areas: (Please anticipate additional comments as these MAs are further developed.

a. There is no differentiation in MA or direction for Upper Tier Roadless Areas vs. non-Upper Tier Colorado Roadless Areas.

b. The standard limiting trail density in Wildlife Management Areas is appreciated. More information on the criteria used to propose WMAs is needed. What is the best way to achieve the wildlife protection identified by CPW? Are WMA[rsquo]s an effective tool or should there be more considerations in the Forestwide Direction to achieve the goals of primary and secondary wildlife emphasis areas identified by CPW?

c. Consider adding a standard to Recreation Emphasis Areas that includes adequate infrastructure (parking, sanitation, amenities, transit) be provided by or arranged by the resort prior to GMUG approval.

d. MA-DC-HIREC-01 (pg 63): Consider including Guidelines that emphasize the importance of appropriate public access, transit and infrastructure (including cell phone communication facilities) to this standard.

e. Management Areas 4.1 and 4.2: Consider adding language that the recreation facilities will be designed to minimize fire risk, flood risk, provide adequate visitor communication infrastructure and reduce demands on smaller and already stretched search and rescue services from gateway communities and local jurisdictions.

CHAPTER 4. Monitoring

1. The National Forest Act requires [ldquo]continuous monitoring and assessment in the field.[rdquo] Monitoring and informing adaptive management is a critical component of this Forest Plan and must be adequately funded to ensure success.

2. Following our initial 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.

3. The WDRLMP states that there will be a monitoring evaluation report produced every two years, and include any indications of whether plan or management changes are warranted (pg 66). However, many of the WDRLMP objectives and goals listed in Chapter 2. Forestwide Direction are on a 10-year or 5-year time frame.

The 10-year timeframe for many objectives listed in the WDRLMP is too long to determine if the plan standards and guidelines are achieving the trends and outcomes desired. We recommend decreasing these timeframes to a maximum of 3-5 years. Once the objective is met, monitoring should be continued to ensure ongoing compliance.

4. To ensure the positive trend toward the Desired Conditions in each section of the WDRLMP, we recommend the monitoring list include a question for each objective. In addition:
 - a. Air Quality as a monitoring question, and/or as an indicator under the climate question.
 - b. Invasive Species as an indicator under terrestrial ecosystem integrity, and/or as an indicator of appropriate management for management areas categories (Wilderness, Wildlife Management Area, Special Interest Areas, etc.).
 - c. Scenic Quality and Scenic Integrity as indicators for all recommended and existing Wilderness, Scenic Byways, National Trails, eligible Wild and Scenic River segments and areas having primitive and semi-primitive ROS.
 - d. The economic contribution of outdoor recreation should be included the way that economic contributions from other actions are (agriculture, leasing, timber, etc.)

SPECIFIC RESOURCES

Wildlife

1. The WDRLMP should provide a framework to ensure that wildlife migration corridors and movement between quality habitat are facilitated.
2. Protection of critical habitat, sensitive habitat and concentration areas, especially winter, should be accomplished with standards rather than guidelines (FW-GDI-SPEC-06) and should be consistent with Colorado Parks and Wildlife recommendations.
3. It is important to have an effective separation between domestic sheep and bighorn sheep on the GMUG. We appreciate the intent of FW-STND-SPEC-15 & -16.
4. Recreation and wildlife needs should be balanced and also protect sensitive wildlife

habitats, areas of high biodiversity such as Potential Conservation Areas (PCAs)

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identified by the Colorado Natural Heritage Program (CNHP) , so that identification and

management of unacceptable ecological impacts in areas in critical or sensitive habitat are prioritized for monitoring and proactive mitigation. See FW-STND-REC-06 and -07.

5. The Wildlife Management Area Standard, MA-STND-WLDF-02, which specifies no net gain of new trails and routes where the density already exceeds the 1 mile per square mile limit, is appreciated.

6. There are no Wildlife Management Areas (WMAs/3.2) proposed for GMUG lands within

San Miguel County or the Norwood Ranger District. CPW shared a map of [ldquo]wildlife

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emphasis areas[rdquo] in San Miguel County which appear to include areas that are

important summer concentration areas for elk, potential lynx habitat and other special wildlife areas. These include areas adjacent to and north of the Lizard Head Wilderness, East Beaver Park, Lone Cone, and Naturita Canyon which are currently [ldquo]General Forest[rdquo] in the WDRLMP. We support the the input of CPW and ask that the GMUG reconsider WMA[rsquo]s in San Miguel County.

Gunnison Sage-Grouse (GuSG) & West Wide Energy Corridor

1. FW-GDL-SPEC-34 to -47 (pg 30 - 32) should be standards instead of guidelines.

2. We encourage the GMUG to consider incorporating Gunnison County and CPW comments regarding GuSG.

3. FW-STD-UC-02 (pg 54): We encourage the relocation of the north-south West Wide Energy Corridor segment through San Miguel County. The alignment forces the corridor to go across private and state lands having critical Gunnison Sage-grouse habitat and close to active leks. Please review our West Wide Energy Corridor comments (attached) provided to Bureau of Land Management for the Section 368 Corridor review.

Remove unneeded obsolete structures and improvements

1. In general, project specific improvements should be retired after ensuring through collaboration and coordination with cooperating agencies that there is no desired

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re-purpose for GMUG or public uses, such as historical preservation or interpretation .

Improvements and facilities constructed to support a project or activity like oil or gas, a mine operation or temporary timber road should be removed or obliterated, and the area should be reclaimed to match the original landscape, topography, hydrology, and ecological functions.

12 <https://cnhp.colostate.edu/ourdata/pca-reports/>

13 San Miguel County staff communication with Colorado Parks and Wildlife SW District

14 FW-GDL-INFR-07 on Page 42 provides for consideration of adaptive reuse/leasing in the context of cultural or historic resources only.

Water

1. In general, buffers for projects, activities, concentrated recreation facilities and infrastructure should ensure that hydrologic connections are not altered and water quality and quantity trends up through healthy soils and forests. A uniform buffer, such as 100-feet, around water resources, may not accomplish this. Retaining and improving shading for riparian areas, drainages and water bodies will provide relief from evaporation and rising temperatures and could prove to be one of the most effective means to mitigate the rapidly changing climate.

Timber

1. 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.

2. With the increase in slope in the WDRLMP 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.

Source Water Protection Areas

1. The USFS should incorporate the strongest possible source water protections by incorporating clear and measurable source water protection standards for all source

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water protection areas within the forest and San Miguel County . The WDRLMP should

incorporate clear activity and project buffers for surface and hydrologically connected areas that could influence the water quantity or quality of groundwater sources. We request that a monitoring question be added to Table 9 of the WDRLMP that triggers monitoring for degradation of source water quality or yields due to forest activities or projects in community source water protection areas and appropriate immediate corrective management actions if any degradation is identified.

15 <http://hermes.cde.state.co.us/drupal/islandora/object/co%3A26568> - Index of and links to Source Water Assessment Reports by CDPHE for communities and facilities within San Miguel County.

Sincerely,

San Miguel County, Colorado Board of Commissioners

Att. I - Wild & Scenic Rivers

March 20, 2018

BOARD OF COMMISSIONERS

HILARY COOPER

KRIS HOLSTROM

LANCE WARING

Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision Comment #51806

RE: Draft Grand Mesa, Uncompahgre and Gunnison National Forests Draft Wild and Scenic River Eligibility Evaluation

Dear Responsible Official and GMUG Planning Team,

Thank you for the opportunity to provide comments on the February 2019 Draft Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG) Draft Wild and Scenic River Eligibility Evaluation¹ report (hereafter, [draft eligibility report]).

It is our understanding that this report is intended to consider eligibility for designation under the National Wild and Scenic Rivers Act of 19682, and segments found eligible will be managed under the appropriate wild, scenic, or recreational river management area direction to protect those values that made it eligible and the characteristics that established its potential classification. To be eligible, the river segment must be [free-flowing] as defined by Section 16(b) of the Act, and the river segment must have one or more outstandingly remarkable values ([ORV]) (Section 1(b)).

The draft eligibility report states that the GMUG will be conducting the eligibility and classification portions of the Wild and Scenic Rivers (WSR) designation process during the forest plan revision, but that GMUG will only initiate a suitability evaluation when three specific conditions are met. If a river segment is found suitable, the agency's administration may recommend it for designation by Congress.

The conditions GMUG has provided that have to be met for GMUG to initiate the suitability evaluation are provided as: [ldquo][bull]Strong local interest or support is demonstrated for wild and scenic river designation, [bull] Congress expresses interest in a specific river for wild and scenic river designation, and/or

[bull] A proposed project would alter the free-flowing character of a stream, such as by impoundment, or would affect the resources that made the stream eligible.[rdquo]

Comment: It is critical that eligible segments be appropriately managed to protect and even enhance their ORVs and preliminary classifications (Wild, Scenic, or Recreation). The suitability analysis of segments found eligible should be done as soon as possible and use a stakeholder

1 https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd610127.pdf

2 PL 90-542:16USC 1271-1287, as amended

[bull] P.O. BOX 1170 [bull] Telluride, Colorado 81435 [bull] (970) 728-3844 [bull]
www.sanmiguelcountyco.gov

process similar to the one the Uncompahgre Field Office of the BLM used, which was very successful.

GMUG Eligibility and Classification Should Allow Additional Eligible Segments Having a Fish ORV and Include Segments Recommended by Colorado Parks and Wildlife Within San Miguel County.

The eligibility evaluation process is described by GMUG in their GMUG Ch. 80 Wild and Scenic River Process online story map³, as identifying rivers to be studied and evaluation eligibility based on free-flowing characteristics and the presence of outstandingly remarkable values (ORVs). The GMUG story map represents the classification process as being the classification of eligible rivers as wild, scenic, or recreational, based on the level of the development of the shoreline and the watercourse, level of access, and water quality. The GMUG story map explains GMUG's approach to defining ORVs as [ldquo]unique, rare, or exemplary features that

are significant within the associated regions of comparison. Only one such value is needed for eligibility, the categories of which include: Scenery, Recreation, Geology, Fish, Wildlife, Prehistory, and History, Other Values (Vegetation, Scientific, and Paleontology).⁴ It appears from the Forest Service Handbook FSH 1909.12, Chapter 80, 82.735, that ORVs must be river-related and [ldquo][hellip]must be a unique, rare, or exemplary feature that is significant when compared with similar values from other rivers at a regional or national scale.[rdquo]

Comment: It appears that GMUG is being too stringent in limiting eligibility to segments with a fish ORV to those with a 90 percent genetic purity or brood stock, rather than allowing eligibility based on a fish ORV for segments with important fish habitat and populations. For example, native cutthroat populations are relatively rare across the GMUG, the State of Colorado, and certainly nationwide. There are important stream segments that should be considered eligible, with a fish ORV, based on their important cutthroat populations and habitat. San Miguel fully supports the comments being provided by Colorado Parks and Wildlife recommending a finding of eligible with a fish ORV for Elk Creek (near Telluride), East and West Forks of Deep Creek (near Telluride), and Fall Creek and its tributary Muddy Creek (upstream of Woods Lake near Telluride).

Additional Segments Should Be Included In the GMUG Draft Eligibility Report.

The draft eligibility report references the comprehensive wild and scenic eligibility evaluation as part of the previous incomplete plan revision process conducted from 2001 to 2007, as documented in the 2016 Comprehensive Assessments and Comprehensive Evaluation Report. The rivers reviewed by the GMUG team during that period within San Miguel County are listed as:

[ldquo]NORWOOD DISTRICT: Bridal Veil, Bear Ck, Ingram, San Miguel River, Deep, Elk, Howard, Lake, Bilk, Big Bear Ck, West Beaver, Beaver, East Beaver, Main Beaver, Silver Pick, Goat, McCullough,

3 <https://usfs.maps.arcgis.com/apps/MapSeries/index.html?appid=22875d85578249f49786ef5599dd0322>

4 <https://usfs.maps.arcgis.com/apps/MapSeries/index.html?appid=22875d85578249f49786ef5599dd0322>; Draft Eligibility Evaluation tab

5 https://www.fs.fed.us/im/directives/fsh/1909.12/wo_1909.12_80_Wild%20and%20Scenic%20Rivers.docx

Saltado, Muddy Ck (trib of Fall), Wilson, Waterfall (by Ophir), Swamp Canyon, Turkey, Vance, Skunk, Prospect, Marshall, Cornet, Mill, Eider, Remine, Willow, Last Dollar, Alder; and Further Discussion Rivers: a) Ames powerhouse [ndash] not water related b) San Miguel River [ndash] historical values due to presence of RR [ndash] water related c) Bear Ck (T-ride) [ndash] majority pvt land. [Abbreviations are as cut/paste from GMUG document, [ldquo]Appendix W-2 [ndash] Rivers Reviewed[rdquo]6.

The rivers found to be eligible within San Miguel County in the GMUG 2006 Comprehensive Assessment Appendix W include Ingram Falls and Bridal Veil Falls. These segments are also shown as [ldquo]Wild and Scenic River Eligible[rdquo] on the companion map.⁷ They are both included as eligible with preliminary classifications of [ldquo]Recreation[rdquo] with ORVs of scenery (falls) and wildlife (Black Swift nesting site) in the GMUG document [ldquo]Volume 1 Chapter 6. Wild and Scenic Rivers[rdquo], July 2006.⁸ Bridal Veil Creek Falls also was given an additional historical ORV in this document.

Ingram Falls segment is described in the above references as 0.3 mile with elevations of 11,000 feet at the top of the falls to 9,600 feet near the base of Black Bear Road. It was considered eligible with a Scenery ORV. This segment is a popular and highly photographed water fall that draws international attention. The falls are visible from Town of Telluride and are well-contrasted against the unique panorama of vertical red cliffs rising up to glacially sculpted peaks. However, it is not included in the 2019 draft eligibility report, despite unchanged conditions.

Examination of the GMUG [ldquo]Notes[rdquo] document containing notes from the GMUG district review and GMUG interdisciplinary team (IDT) review in July and August of 2018 says, [ldquo]20180711 - district review concurred with previous eligibility recommendation for scenery and wildlife ORVs with initial classification of recreation. Black Swift site, split on wild_scen_2007 to approximate falls. 08/31/18 Forest Planning Team discussion - although black swift are uncommon, they are ranked by CNHP as G4/S3B, which does not reach one threshold being used to determine botanical/wildlife ORVs. Concur as eligible w/just the ORV of scenery.11/26/2018- The Responsible Official determined that this segment does not meet the requirements to be determined eligible.[rdquo]9

Comment: The condition of Ingram Falls is unchanged from the date of this analysis and has previously been found eligible as a free-flowing segment with one or more ORVs. Ingram Falls should be included in the Eligibility Evaluation process and report, with a finding of eligible for an ORV of scenery, and a preliminary classification of Recreation. The nesting population of black swifts is very important to our community and they should be recognized as an ORV. The 2019 eligibility report should be the location for discussion of segments previously found eligible. FSH 1909.12, Chapter 80, 82.3, provides, [ldquo]The Responsible Official may choose to evaluate or reevaluate a river for eligibility at any time through a plan amendment. This may occur in relationship to project planning or as a result of changed circumstances[hellip][rdquo] FSH 1909.12, Chapter 80, 82.4, states, [ldquo]Generally if a river segment has been studied in the past and a determination was made of its eligibility, it does not need to be studied again for eligibility

6 https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd613813.pdf

7 https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd613816.pdf

8 https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd502020.pdf

9 https://www.fs.usda.gov/Internet/FSE_DOCUMENTS/fseprd610128.pdf

during any subsequent land management planning, unless changed circumstances warrant additional review of eligibility.[rdquo] It also states, [ldquo]Changed circumstances are changes that have occurred to the river or the river corridor that have affected the outstandingly remarkable values (sec. 82.73).[rdquo]

Bridal Veil Falls segment is also not included in the 2019 draft eligibility report. It is described in the 2006 references above as a 0.02 mile segment with elevations ranging from 10,600 feet at the top of the falls to 9,800 feet at the base of the falls, located at the second switchback on Black Bear Road. The Ames Power Station is adjacent to the Bridal Veil Road. Bridal Veil Falls segment was considered eligible with ORVs of scenery (falls) and recreation (ice climbing). These falls are noted to be one of the most photographed features of the Telluride area, but is also arguably one of the most photographed and iconic river-segment/water-falls in the entire GMUG and is popular with locals and international visitors.

Examination of the GMUG [ldquo]Notes[rdquo] document containing notes from the GMUG district review and GMUG interdisciplinary team (IDT) review in July and August of 2018, says, [ldquo]Power plant & diversions, Black Swift nesting site, approximate location of falls on flowline feature. 7/11/18 - District initially discussed the scenic, wildlife, and heritage values of this segment for historic power plant, black swift nesting site, and iconic scenery of the falls themselves. 8/31/18- IDT discussed that the waterfalls are not actually located on USFS lands; and black swifts, while are uncommon, they are ranked by CNHP as G4/S3B, which does not reach one threshold being used to determine botanical/wildlife ORVs. Team suggests not eligible.[rdquo]

Comment: The condition of Bridal Veil Falls is unchanged from the date of this analysis and has previously been found eligible as a free-flowing segment with one or more ORVs. Bridal Veil Falls should be included in the Eligibility Evaluation process and report, with a finding of eligible for the scenery, recreation, and historical ORVs, with a preliminary classification of Recreation. It is still a popular ice-climbing area. The nesting population of black swifts is very important to our community and they should be recognized as an ORV. The 2019 eligibility report should be the location for discussion of segments previously found eligible, so that the public can read documentation and agency rationale for determinations, and comment of these materials.

County references may disagree with the USFS determination that the falls are not on federal GMUG land. We recommend including in the eligibility report as above, and conducting a survey to determine property boundaries and ownership during field season. If the segment is found to intersect non-GMUG land, the landowner should be consulted for their opinion on suitability and support for a recommendation of Wild and Scenic designation when

a suitability determination is initiated. Documentation of ownership detail should be published in the GMUG eligibility report and subject to public review and comment.

Beaver Creek, tributary to the San Miguel River, within San Miguel County was found eligible and suitable for a Recreational designation with vegetation ORV in the UFO BLM Draft Wild and Scenic River Suitability report (2013)¹⁰ and the 2016 UFO BLM Draft Resource Management Plan

¹⁰ https://eplanning.blm.gov/epl-front-office/projects/lup/62103/78805/90472/WSR_Suitability_Report_Final_04272012.pdf

(DRMP)/Environmental Impact Statement (EIS)¹¹. The BLM segment stretches approximately 14.3 miles from the Beaver Creek confluence with the San Miguel River upstream to the GMUG Forest Boundary. This segment is proposed for a WSR designation of Recreational in Alternative D. The stated ORV for this segment is Vegetation, described as an [ldquo]A-ranked[rdquo] superior occurrence of globally vulnerable (G3) narrowleaf cottonwood/blue spruce/thinleaf alder riparian forest, which is a primary reason the existing San Miguel BLM Area of Critical Environmental Concern (ACEC) was created. The designation of Recreational received strong support from a primary private landowner and San Miguel County, and was chosen to provide "reasonable certainty that future water development projects would receive consideration and could move forward with minimal difficulty."¹²

Comment: Examination of aerial imagery suggests substantially similar riparian vegetation continues upstream onto the GMUG lands. We recommend that an approximately 1-mile long segment of Beaver Creek extending south from the GMUG/BLM boundary to the confluence with West Beaver Creek be included in the GMUG eligibility report and found eligible with a similar vegetation ORV, as the segment flowing through the adjacent BLM land.

11 https://eplanning.blm.gov/epl-front-office/projects/lup/62103/82329/97326/Vol_I_UFO-DRMP-2016_web.pdf

12 Page 37;

http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_docs_1.Par.70506.File.

dat/WSR

%20Suitability%20Report_Final_04272012.pdf

Map 1: Showing the southern extension of the UFO BLM land and outline of the Beaver Creek Wild and Scenic River segment found suitable for a Recreation classification and having a vegetation ORV. Yellow shading shows BLM land ownership. The segment terminates at the GMUG forest boundary. GMUG NF land is shaded green. The red circle shows the portion of Beaver Creek on GMUG NF land that should be included in the GMUG eligibility report, and found eligible with vegetation ORV. The WSR Corridor shown is the UFO BLM Alternative D - WSR Final Eligibility Shapefiles¹³. Imagery is 2017 3-inch Pictometry (San Miguel County).

Discussion of Segments Included in the GMUG Draft Eligibility Report.

San Miguel County has provided comments in 2016 to the UFO BLM (Attachment A) and Colorado Water Conservation Board (CWCB) (Attachment B) indicating support for the UFO BLM determinations of suitability of river segments identified in BLM Alternative D, which are within the San Miguel and Dolores Basins.

By making a determination of [ldquo]suitable[rdquo] for inclusion in the National Wild and Scenic Rivers System for the segments contained in Alternative D of the DRMP/EIS, the UFO BLM is honoring the countless hours of work from local stakeholders, citizens, sub-RAC (Resource Advisory Council), RAC members, and state and federal agency specialists, along with all of the public input gathered in-person and via multiple written comment periods.

13 https://eplanning.blm.gov/epl-front-office/projects/lup/62103/90006/107864/WSR_ALT_D_FINAL.zip

The number of segments recommended as [ldquo]suitable[rdquo] by the UFO BLM process is a very small

subset of the number of segments analyzed by the BLM. The stakeholder group's work determined that recommending a determination of "suitable" for WSR designation was found to be the best locally acceptable method to manage and maintain important native fish or other critical wildlife habitat, recreation, and scenic values. Private property rights and water rights were carefully considered during the suitability process led by the stakeholder group and had been appropriately respected in Alternative D of the draft UFO BLM DRMP/EIS14.

Similar to our comments and support for suitability of certain segments within the UFO BLM, San Miguel County supports GMUG including adjacent river segments with a finding of eligible and identification of the same OHVs where the segments are substantially similar. We urge the GMUG to find these segments suitable during the suitability determination process and to work with the CWCB at the appropriate time to obtain flow protections using state processes to support the flow-related ORVs where they do not already exist within the segments.

Generally, San Miguel County does not comment on features beyond our jurisdictional boundary. However, we feel it is important to indicate our continued strong support both San Miguel River Segments 1 (within San Miguel County) and Segment 2 (extending into Montrose County) because of their shared connection to our economy, recreational opportunities important to our residents and visitors, important visual resources within the San Juan Skyway Scenic Byway and the Unaweep- Tabeguache Scenic and Historic Byway, and native fish habitat which transcends artificial political and stream segmentation polygons.

Comment: The San Miguel River center line and WSR buffer is mostly on lands managed by the UFO BLM. The GMUG should respect the robust and exhaustive process that was performed for the UFO BLM DRMP/EIS, which included input from CPW, U.S. Fish and Wildlife (USFWS), and Colorado Natural Heritage Program (CNHP), by including the preliminary classification and all of the ORVs identified by the BLM. San Miguel River Segment 1 was given the preliminary classification of Recreational, with Scenic, Recreational, Wildlife (fish), Historic, Vegetation, and Paleontology ORVs by the UFO BLM. There are small intersections of the river and the WSR buffer with GMUG NF land. The eligibility, ORVs and preliminary classification have no significant change other than a change in agency ownership and should therefore be the same. San Miguel River Segment 2 was given the classification of Wild, with Scenic, Recreational, Wildlife (fish), and Vegetation ORVs by the UFO BLM. However, the GMUG draft eligibility report only provides Scenery and Recreation ORVs for both San Miguel River Segments 1 and 2. The full list of UFO BLM ORVs should be referenced in the GMUG eligibility report for these segments.

Comment: Not all of the GMUG lands that intersect the San Miguel River Segments 1 and 2, or their buffers, appear to have been included in the GMUG draft eligibility report, figures, and GIS files. We request that the entire width of these WSR corridors be included and that GIS be re- checked.

Map 2: Showing in blue, the UFO BLM WSR corridors for San Miguel River Segments 1 and 2. The pink areas are the GMUG WSR Eligibility Evaluation corridors downloaded from the GMUG Planning web page¹⁵. Red circles show areas where San Miguel County GIS layers suggest there are additional GMUG NF intersections with the San Miguel River and/or the WSR corridor, which should be included in the GMUG eligibility report, as eligible with the same ORVs as identified by the UFO BLM. Map is 1:100,000 scale.

Sincerely,

SAN MIGUEL COUNTY, COLORADO BOARD OF COUNTY COMMISSIONERS

/signed/

Kris Holstrom, Chair

¹⁵ <https://usfs.maps.arcgis.com/sharing/rest/content/items/ddabcc0e97714d29905eae9aa1afe914/data?token=>

Attachment A

SAN MIGUEL COUNTY

BOARD OF COMMISSIONERS

ART GOODTIMES AMY LEVEK JOAN MAY

October 31, 2016

Joseph Meyer, Southwest District Manager

Dana Wilson, Acting Uncompahgre Field Office Manager Project Manager, Uncompahgre RMP

Bureau of Land Management Uncompahgre Field Office 2465 S. Townsend Ave.

Montrose, CO 81401

Via Email: uformp@blm.gov

Dear Joe and Dana,

San Miguel County (SMC) is pleased to be offered the opportunity to comment on the Uncompahgre Field Office of the Bureau of Land Management (UFO BLM) Draft UFO Resource Management Plan (RMP) / Environmental Impact Statement (EIS) [hereafter, "DRMP/EIS"]

In 2015, the San Miguel County Board of County Commissioners approved Resolution 2015-0091 (Attachment A), stating that public land under the management of the U.S. Forest Service and BLM constitute more than 60% of the land within San Miguel County and included the following statements:

? federal public lands are essential to the quality of life in San Miguel County, providing public recreational opportunities for wildlife watching, hiking, hunting, fishing, backpacking, horseback riding, skiing, bicycling, sightseeing, and numerous other outdoor recreational activities;

? federal public lands provide essential habitat for wildlife;

? wildlife and scenic landscapes on the public lands attract outdoor recreation and tourism that are the dominant drivers of San Miguel County's economy;

? San Miguel County business owners attract employees in large part because of the iconic landscape and recreational opportunities on federal public lands;

? San Miguel County's agriculture industry includes numerous ranchers and sheepherders who are dependent on grazing on federal public land;

? San Miguel County residents are actively collaborating among diverse interests and with public land managers to improve public land management and public access.

We have attempted to recommend actions that San Miguel County would like to have incorporated into the Final RMP and Record of Decision (ROD) and recommend improvements for what we consider shortcomings in portions of the plan and. We are not asking for just a single alternative to be implemented. We have identified places where we do not agree with the agency preferred Alternative D, and might agree in whole or in part with another Alternative, such as Alternative B. However, we have tried to approach each item that we perceive to be within or directly affecting San Miguel County in such a way as to offer desired actions and stipulations, which may be a customized mix or hybrid of different alternatives. We have attempted to offer our desires so that they can be practically accomplished when implementation of the Final RMP begins. We believe incorporating our

1<http://www.sanmiguelcountyco.gov/301/Document-Viewer>

recommendations will strengthen the document so that it provides clearer guidance and expectations in resource management programs, practices, and protections for the present and for the future.

Our comments are also offered in the spirit of the DRMP/EIS statement, "The BLM's planning regulations require that RMPs be consistent with officially approved or adopted resource-related plans [hellip]so long as they are also consistent with the purposes, policies, and programs of federal laws and regulations applicable to BLM-administered lands." 2

We also offer our comments in the spirit that the BLM attempted to "explore opportunities to enhance management of resources and resources uses; resolve conflicts among resources and resource uses; meet the purpose and need for the RMP; and are feasible to accomplish.[rdquo]

While San Miguel County philosophically is more supportive of the intent of Alternative B over Alternatives C and D, there are times where our comments realize that a balanced multiple use and human activities and structures are necessary for economic development and recreation, where they can avoid or mitigate impacts to other activities or wildlife needs.

(From Page 2-7 of the DRMP/EIS)

(From Page 2-8 of the DRMP/EIS)

2http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_1.Par.7326.File.da
t/1_UFO-DRMP-

2016_508.pdf

With the intent that our comments are practical, we are not commenting on Alternative B-1 or designations that are not within or do not have direct impacts on San Miguel County.

We have prepared our comments mostly by special designation or resource use categories, and our comments are generally specific to areas, resources, resource uses, and potential designations within San Miguel County. In some cases where the RMP decision may affect San Miguel County, we have also commented. We have attempted to provide clear comments and recommendations, but in reviewing a plan, supporting materials, and spatial data, we realize our comments may not be as clear as we intended. Please encourage the UFO staff to contact our staff lead, at 970-369-5441 or lynnp@sanmiguelcountyco.gov if there are any questions or clarifications needed.

1. LANDS WITH WILDERNESS CHARACTERISTICS/WILDERNESS STUDY AREAS (WSAs)

Summary: There are no Lands with Wilderness Characteristics or WSAs mapped within San Miguel County. San Miguel County appreciates that these lands were inventoried by the BLM and supports comments being submitted by Conservation Colorado and Western Colorado Congress on this subject.

2. WILD AND SCENIC RIVER (WSR) SUITABILITY.

Summary:

? San Miguel County fully supports the designations of the identified river segments within the San Miguel Basin as suitable.

? San Miguel County fully supports the designation as [ldquo]suitable[rdquo] of the segments proposed in DRMP/EIS Alternative D, with some differences in the Alternative D stipulations.

? See Rational/Discussion for specific comments on segment management stipulations.

Rationale/Discussion:

Determination of Suitability

By making a determination of "suitable" for inclusion in the National Wild and Scenic Rivers System for the segments contained in Alternative D of the DRMP/EIS, the UFO BLM is honoring the countless hours of work from local stakeholders, citizens, sub-RAC (Resource Advisory Council), RAC members, and state and federal agency specialists, along with all of the public input gathered in-person and via multiple written comment periods.

The number of segments recommended as "suitable" is a very small subset of the number of segments analyzed and their designation as suitable was found to be the best locally acceptable method to maintaining important native fish or other critical wildlife habitat, recreation and scenic values. Private property rights and water rights were carefully considered during the suitability process led by the stakeholder group and had been appropriately respected in Alternative D of the draft RMP/EIS. 3, 4

San Miguel County urges the UFO BLM to support these determinations of suitability within the Dolores and San Miguel Basin and to work with the Colorado Water Conservation Board (CWCB) to obtain flow protections using state processes to support the flow-related Outstandingly Remarkable Values (ORVs) where they do not already exist within these segments.

In June 2010, the UFO BLM published their findings of eligibility for 174 river segments studied and evaluated in advance of the Uncompahgre Resource Management Plan (RMP). The analysis area included

3Pages 3-164-167;

http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_1.Par.96289.File.dat/3_UFO-DRMP-2016_508.pdf

4http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_appendix0.Par.2133.File.dat/P_WSR-

Suit_UFO-DRMP-2016_508.pdf

a portion of the Dominguez-Escalante National Conservation Area (NCA). An additional segment of the Dolores River, identified in the San Juan Public Lands Draft Land Management Plan, was evaluated by the UFO BLM because the northernmost 11.8-mile downstream portion of this segment is within the UFO planning area.

The BLM found after completion of field assessments and data analysis that informed their eligibility determination process, that 34 segments out of the 174 segments scoped were determined to be both free-flowing and to possess one or more outstandingly remarkable values (ORVs) that are necessary for Wild and Scenic River eligibility. During the eligibility process, reviews of free-flowing character and determinations of ORVs were made by Colorado Parks and Wildlife (formerly Colorado Division of Wildlife; CPW), U.S. Fish and Wildlife Service (USFWS), and Colorado Natural Heritage Program (CNHP). The Draft Eligibility Report had a typical public comment period with comments received by the BLM from diverse interests.

In addition, fish values were assessed by Colorado Parks and Wildlife (CPW) on the San Miguel and Dolores Rivers. A presentation by Dan Kowalski, Aquatic Biologist, CPW, stated that San Miguel River Segments 1 and 2 are very important and highly used fisheries with important recreational fishing values. San Miguel River Segment 2 was identified as exceeding the Gold Medal Biomass standard in some years. Native fish species identified on the San Miguel River are Colorado Pikeminnow (Federally Endangered/State Threatened); Bluehead Sucker (State Threatened); Flannelmouth Sucker (State Threatened); Roundtail chub (State Species of Special Concern; BLM Sensitive Species); Colorado River Cutthroat Trout (State Species of Special Concern); Speckled Dace and Mottled Sculpin.⁵

In February 2013, the UFO BLM published their final Wild and Scenic River Suitability Report, which further analyzed the suitability of 28 river segments, including the 11.88-mile segment of the Dolores River.⁶ (Six river segments, found eligible, were separately analyzed for suitability within the Dominguez- Escalante NCA RMP.)

During the robust suitability process, the BLM weighed protective measures for eligible river segments and the corresponding corridor in relation to current and potential identified uses. Possible environmental and economic consequences of, management issues resulting from, and reasonable alternatives to WSR designation were considered. Preliminary segment boundaries and classifications were reevaluated in response to public input. Geographic information systems data was recalculated, at times resulting in modified segment lengths and land ownership measures. Public participation and comments resulted in refinement of which segments were considered suitable for 10 stakeholder group meetings within the Dolores/San Miguel Basin. (Separate stakeholder processes were initiated for segments in the Gunnison River Basin and those in the Dolores and San Miguel river basins.) Stakeholder groups held public meetings during late 2010 and early 2011. The Dolores/San Miguel Basin subgroup considered BLM analysis and public input and developed recommendations for each of the Dolores-San Miguel segments. A second public comment period was held to receive even more input prior to suitability recommendations from the stakeholder group. Hundreds of public comments were considered during the formal suitability public comment period.

San Miguel County fully believes that the stakeholder group, co-chaired by John Reams, a construction and

mining contractor and rancher based in Norwood and Naturita, and Peter Mueller, a project director for the Nature Conservancy, based in Telluride, represented diverse backgrounds and interests and solicited diverse input from the public that was deeply considered in the final results of the process.

5http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/wsr_docs.Par.32765.File.dat/San%20Miguel%20Dolor

[es%20Fish%20DOW%20Presentation%20Dan%20Kowalski.pdf](#)

6http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_docs_1.Par.70506.File.dat/WSR%20Suitabi

[lity%20Report_Final_04272012.pdf](#)

Stakeholder meetings were held in Norwood, Naturita, and Telluride, whose residents are known to have very different political views on energy, minerals, recreation, agriculture, and forestry.⁷ The Dolores/San Miguel Basin subgroup examined 21 different stream segments and public input received was incorporated into their findings.⁸ The stakeholder group found 7 segments to be Suitable with modifications, 6 segments to be Suitable, and 8 to be Not Suitable.⁹ Their recommendations were then considered by the BLM Southwest Resource Advisory Council (SW RAC) which voted unanimously to recommend that 8 segments in the San Miguel Basin and 5 segments in the Dolores Basin be found suitable. The BLM incorporated these recommendations into its preferred Alternative D of the UFO draft RMP/EIS.

San Miguel County is supportive of NCA legislation on the Dolores River Segments 1 and 2 and the La Sal Creek Segments 2 and 3, which overlap with the Tres Rios and Uncompahgre BLM offices. If the NCA is successful, we believe that a Suitability determination would no longer be relevant. However, until an NCA is agreed upon, Suitability is a powerful tool to bring stakeholders and governments to the table to agree on NCA terms. Currently, there is no guarantee that an NCA will happen in the near future or that there will be agreement as to how the NCA will protect flows in place of current Suitability. Therefore, until such time as an NCA may be established that protects both flow-related and non-flow dependent ORVs, San Miguel County urges the CWCB to support the Alternative D suitability recommendations for the Dolores River. If an NCA is established that accomplishes full protection of ORVs, we would then support the determination for these 4 segments to be changed to not suitable.

San Miguel County understands that when the CWCB voted to appropriate an Instream Flow right (ISF) on the Dolores River from the San Miguel to Gateway (Lower Dolores Segment), the BLM offered in an unprecedented agreement, not to seek a federal water right on this river segment to protect the ORV flows. This was a very important consideration by the CWCB in voting to appropriate the ISF. We support the CWCB in asking for this language to be carried through on the other Dolores River sections.

While the ISF is important to protect the Lower Dolores segment (25), the ISF alone would not protect the wide

array of ORVs, including: recreational and the extraordinary rafting, kayaking and canoeing opportunities; peregrine falcon habitat, including for breeding and nesting; and geologic and scenic, including the historic hanging flume. The BLM's Report admits that due to the limited unappropriated water, it is unlikely that the high flows needed to sustain recreational activities could be secured. The Suitability determination on the Lower Dolores sections would complement the State's ISF by adding land management protection for this incredibly scenic and remote stretch of river with its historical, cultural and wildlife attributes.

San Miguel County also understands that The Lower Dolores from McPhee Dam to Bedrock already operates with a Suitability designation that was in place when the dam was built. The BLM has made it clear that it can't take away the senior water rights of the Dolores Project or require new reservoir releases through Suitability; rather it must work within the Colorado water rights system. The current Suitability determination on the Dolores has not appeared to affect Drought Contingency Planning or any coordinated management efforts.

A. San Miguel River Segment 1 [ndash] ORVs are Scenic, Recreational, Wildlife, Historic, Vegetation, and Paleontology. Over 19 miles of this segment lies within the existing San Miguel ACEC, and it

7http://www.telluridenews.com/news/article_d60c6f40-91d2-542e-8dad-e06bb13d4e85.html

8http://matchbin-assets.s3.amazonaws.com/public/sites/165/assets/64CW_The_Watch_March_17_2011.pdf

9[http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/wsr_docs.Par.31074.File.dat/2011-](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/wsr_docs.Par.31074.File.dat/2011-0225%20WSR%20Dolores%20San%20Miguel%20Segment%20Analysis%20RAC%20Recommendation.pdf)

[0225%20WSR%20Dolores%20San%20Miguel%20Segment%20Analysis%20RAC%20Recommendation.pdf](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/wsr_docs.Par.31074.File.dat/2011-0225%20WSR%20Dolores%20San%20Miguel%20Segment%20Analysis%20RAC%20Recommendation.pdf)

appears nearly the whole segment lies within the proposed San Miguel Expansion ACEC (GIS files). 10

The San Miguel River corridor is extremely important for the local economy. Preserving scenic views while allowing for high-quality boating, fishing, and retaining the existing travel management plan uses/limitations is extremely important to San Miguel County.

Due to the scenic and recreational ORVs, the fact that this segment is within the designated San Juan Skyway Scenic Byway and the Unaweep-Tabeguache Scenic and Historic Byway, it is very important to retain no less than a V-2 category for visual resource management. This is consistent with the San Juan Scenic Byway Management Plan¹¹, the Unaweep-Tabeguache Scenic and Historic Byway Corridor Management Plan¹², and the San Miguel County Comprehensive Development Plan¹³. While the DRMP/EIS states [ldquo]The BLM would

not permit any actions that would adversely affect the free-flowing condition, ORVs, and adequate water quality to support those ORVs or tentative classification of any of the segments, or would result in the reduction of water quality to the extent that it would no longer support the ORVs[hellip][rdquo]14, the stipulations provided in Alternative D do not provide the safeguards needed to make this a true statement. If this is indeed a fact, then stronger stipulations are needed to replace those in Alternative D and/or in addition to the Alternative D stipulations. Also, reaches within this segment contain four globally vulnerable (G3) riparian communities.

B. Saltado Creek [ndash] This segment is proposed for a WSR designation of Wild in Alternative D. The stated ORV for this segment is Vegetation, described as an [ldquo]A-ranked[rdquo] superior occurrence of globally vulnerable (G3) narrowleaf cottonwood/blue spruce/thinleaf alder riparian forest, which is a primary reason the existing San Miguel ACEC was created.15

C. Beaver Creek --

This segment is proposed for a WSR designation of Recreational in Alternative D. The stated ORV for this segment is Vegetation, described as an [ldquo]A-ranked[rdquo] superior occurrence of globally vulnerable (G3) narrowleaf cottonwood/blue spruce/thinleaf alder riparian forest, which is a primary reason the existing San Miguel ACEC was created.16 The designation of Recreational received strong support from a primary private landowner and San Miguel County, and was chosen to provide "reasonable certainty that future water development projects would receive consideration and could move forward with minimal difficulty." 17

10http://www.blm.gov/co/st/en/fo/ufo/uncompahgre_rmp/ufo_draft_rmp_shape.html

11[https://www.codot.gov/travel/scenic-byways/southwest/san-juan-](https://www.codot.gov/travel/scenic-byways/southwest/san-juan-skyway/SanJuanSkywayCorridorManagementPlan.pdf/at_download/file)

[skyway/SanJuanSkywayCorridorManagementPlan.pdf/at_download/file](https://www.codot.gov/travel/scenic-byways/southwest/san-juan-skyway/SanJuanSkywayCorridorManagementPlan.pdf/at_download/file)

12[https://www.codot.gov/travel/scenic-byways/southwest/unaweeptabeguache/unaweeptageguache-byway-](https://www.codot.gov/travel/scenic-byways/southwest/unaweeptabeguache/unaweeptageguache-byway-corridor-management-plan-sep-2013)

[corridor-management-](https://www.codot.gov/travel/scenic-byways/southwest/unaweeptabeguache/unaweeptageguache-byway-corridor-management-plan-sep-2013)

[plan-sep-2013](https://www.codot.gov/travel/scenic-byways/southwest/unaweeptabeguache/unaweeptageguache-byway-corridor-management-plan-sep-2013)

13<http://www.sanmiguelcountyco.gov/DocumentCenter/Home/View/222> 14Page 4-409;

[http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_2.Par.12939.File.dat/4_UFO-DRMP-](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_2.Par.12939.File.dat/4_UFO-DRMP-2016_508.pdf)

[2016_508.pdf](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_docs.Par.16348.File.dat/Final%20WSR%20Eligibility%20Report%20Final%20Web%20071210.pdf)

15Page 64;

[http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_docs.Par.16348.File.dat/Final](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_docs.Par.16348.File.dat/Final%20WSR%20Eligibility%20Report%20Final%20Web%20071210.pdf)

[%20WSR%20Eligibility%20Report%20Final%20Web%20071210.pdf](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_docs.Par.16348.File.dat/Final%20WSR%20Eligibility%20Report%20Final%20Web%20071210.pdf)

16Page 64;

http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_docs.Par.16348.File.dat/Final%20WSR%20Eligibility%20Report%20Final%20Web%20071210.pdf

17Page 37;

http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_docs_1.Par.70506.File.dat/WSR%20Suitability%20Report_Final_04272012.pdf

3. SAN MIGUEL RIVER/SALTADO CREEK/BEAVER CREEK AREA COMMENTS:

First, the San Miguel River corridor along with tributaries Saltado and Beaver Creeks was analyzed by San Miguel County staff holistically. These areas have several existing and proposed designations within either Alternative A, Alternative B, and/or Alternative D. However, we found that the stipulations provided in the UFO BLM DRMP/EIS GIS files did not match the language within the RMP, and added quite literally, layers of complexity to understand which stipulation (generally the most protective or stringent) would apply to which portion of land within this area.

To aid in this analysis, San Miguel County staff prepared a comparison table (Attachment B) that showed the stated stipulations for each designation category, for the San Miguel River mainstem and surrounding canyon/Area of Critical Environmental Concern (ACEC) lands; the Saltado Creek drainage and surrounding canyon/ACEC lands; and the Beaver Creek drainage and surrounding canyon/ACEC lands.

As one example of the inconsistencies of stipulations in this area, a single place within the San Miguel River proposed Wild and Scenic River (WSR) Segment 1, near the confluence with Specie Creek -- was within:

? the Alternative D WSR segment proposed as Suitable, Recreation;

? the Alternative D San Miguel River Special Recreation Management Area (SRMA);

? the Alternative A and D existing San Miguel River Area of Critical Environmental Concern (ACEC) designated in 1993 to protect the high-quality riparian vegetation resources, habitat for many bird species, and the scenic value of the corridor, within or proximal to a State designated Scenic Byway; (According to the BLM's ACEC Final Report of 2013, the riparian vegetation community exists "mainly due to the undammed San Miguel River and its intact hydrology." The report went on to state, "Such communities are becoming increasingly rare in Colorado." 18

The report also states that the Visual Resource Index (VRI) should be V-2 for the existing San Miguel River ACEC.)

? the Alternative D San Miguel Ecological Emphasis Area;

? the Alternative D fluid minerals stipulation: No Surface Occupancy (NSO)

? the Alternative B San Miguel River Expansion ACEC which would expand the ACEC to protect additional lands having high-quality riparian vegetation resources, bird habitats, and scenic values, within or proximal to State designated Scenic Byways; (The BLM's ACEC Final Report states that the VRI should be V-2 for the San Miguel River Expansion ACEC.)

? the Alternative B fluid minerals stipulation: No Lease (NL);

? the Alternative A lands shown as not having Coal potential.

What we found in our comparison table was that the preferred Alternative D, for the above designations and shapefiles, would classify this with a hodge-podge of V-2 within the WSR polygon, but V-3 within the ACEC and SRMA. This makes no sense because these lands are proximal/in/adjacent to two state- designated scenic byways. The Enhanced Ecological Area and WSR would have a Controlled Surface Occupancy (CSO) stipulation, while the overlapping ACEC, SMRA, and fluid minerals layers would have No Surface Occupancy (NSO) for Alternative D. The SMRA, ACEC Expansion, and fluid minerals Alternative B stipulation would be NL.

18Page 41;

http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_docs_1.Par.52182.File.dat/ACEC%20Report

%20Final%2001152013.pdf

Rather than have so many overlapping layers with varying and conflicting stipulations overlying each other on the ground, a situation that will certainly be more prone to human error in interpretation and implementation, San Miguel County desires that the lands within the San Miguel Expansion ACEC and/or San Miguel SMRA Alternative B boundaries be given protections that will be simplified, allow for appropriate recreation, allow for adequate protection for the ACEC and WSR values, provide co- protection for wildlife, and adequately protect the visual resources.

The final decision should:

A. Include a determination of "suitable" for inclusion in the National Wild and Scenic Rivers System for San Miguel River Segment 1, Beaver Creek and Saltado Creek.

B. Expand the San Miguel River ACEC to include all of the lands within the existing San Miguel River ACEC and the proposed San Miguel River Expansion ACEC in Alternative B.

C. Continue the existing San Miguel River SRMA which is included in the agency preferred Alternative D. There are an additional 76 acres that would be included in the SRMA just southwest of the confluence of Willow Creek and the San Miguel River. San Miguel County does not want this SRMA changed to become the San Miguel River Corridor Extensive Recreation Management Area (ERMA) that is proposed in Alternative C. The VRM classification should be changed from VRM-III to VRM-II to be consistent with the ACEC and the two state-designated scenic byways. The incredible scenic qualities of this area are very important economically to the region and should be maintained and managed at VRM-II. The SRMA should be expanded to match the San Miguel River Expansion ACEC boundary, such as in Big Bear Creek area.

According to the BLM, any area not identified as an SRMA is automatically managed as an ERMA. On the BLM UFO Recreation Management Area web page, the BLM states: "Within ERMA's, recreation is unstructured and does not require intensive management or significant investment in trails or facilities. This type of custodial or [dispersed] recreation management provides minimal visitor services and few developed recreational facilities."¹⁹ Because there is a large identified local, regional, national and international market demand for structured recreation, the San Miguel River SRMA is the best management fit. Within the San Miguel River SRMA, there are developed recreation sites, including campgrounds, staging areas, visitor information, and limited facilities.

D. With appropriate stipulations for the above, the complex mosaic of Enhanced Ecological Areas as proposed in the San Miguel River Expansion ACEC/SRMA areas should not be needed as wildlife will be getting protection benefits from the management decisions and implementation of the WSRs, SMRA, and expanded ACEC. The stipulations contained in the Enhanced Ecological Area shapefile for Alternatives B and D are much weaker than those for the other intersecting designations of ACEC, SRMA, and WSR (see Attachment A). ²⁰

The BLM's stated reason for contemplating an EEA in the San Miguel River is provided in its description in the DRMP/EIS Appendix D21:

¹⁹<http://www.blm.gov/co/st/en/fo/ufo/recreation.print.html>

²⁰http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/shape_files_3.Par.60521.File.dat/ecological_emphasis_areas.zip

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²¹http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_appendix.Par.39615.File.dat/D_EEAs_UFO-DRMP-2016_508.pdf

San Miguel County desires that within the San Miguel River existing/expansion ACEC - San Miguel River SRMA - San Miguel Segment 1/Beaver Creek/Saltado Creek WSRs that the final RMP/ROD does not designate the additional San Miguel Enhanced Ecological Areas. With the stipulations recommended below, these areas will be well served. All of the stipulations recommended for Alternative D for creating the San Miguel EEA are included or exceeded in our list of stipulations below.

The BLM defines Ecological Emphasis Areas (EEAs) as areas that are "otherwise unprotected core wildlife and native plant habitat and associated movement, dispersal, and migration corridors," with the objective of having a designated EEA being "manage to preserve the continuity of habitats, vegetation communities, and native wildlife within, while following vegetation mosaic objectives" 22

E. San Miguel County believes that the San Miguel River, including the Saltado and Beaver Creek areas, can be served by a single set of stipulations that meet the needs and criteria of all of the overlapping designations recommended by the BLM and/or requested by San Miguel County (San Miguel ACEC Expansion, San Miguel River SRMA, and all 3 WSR segments). The stipulations for these lands collectively should include:

? "7" = Limit camping to 7 days, 6 nights maximum within a 30-day period for dispersed camping.

o SMC Note: Do not change the current maximum length of stays at the improved BLM campgrounds: Fall Creek (7 days), Caddis Flats (14 days), or Lower Beaver (7 days).

? "AVOID" = ROW Avoidance.

o SMC Note: San Miguel County would support an EXCL = ROW Exclusion for some areas where no ROWs currently exist, however, it is the county's desire to have the ability to scope a bike path or trail from Telluride to Placerville somewhere off of State Highway 135 and near the San Miguel River and/or additional broadband infrastructure on existing ROWs or short segments of new ROW, if there are not significant negative impacts to ACECs, WSR, or recreation.

? "CAMPFIRE" = No Campfires for dispersed camping.

o SMC Note: San Miguel County is ok with campfires in existing campgrounds -

- Fall Creek, Caddis Flats and Lower Beaver if already allowed.

? "COAL" = Closed to coal mineral leasing.

o SMC Note: BLM data that there is little to no actual coal potential and allowing for coal mineral disposal would negatively impact ORVs with little actual mineral resource benefit. This entire area is given a classification of no coal potential in Alternative A.

http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_1.Par.31726.File.dat/2_UFO-DRMP-2016_508.pdf

- ? "CWOD" = Closed to commercial wood cutting.
- ? "DES" = Limited to designated routes / Limited to existing routes.
- ? "DR_Timing" = Designated routes - Timing Limitations, Limited to designated routes all other times (for wildlife).
- ? "HYDROE" = Exclusion area for hydropower.
- o SMC Note: This is consistent with the importance of this segment for fishing and recreational boating.
- ? "LOCATE" = Petition Secretary of Interior to withdrawal for locatable minerals.
- ? "NL" = No lease.
- o SMC Note: There are low oil and gas potential in the eastern portion of the expanded San Miguel River ACEC. According to Colorado Oil & Gas Commission (COGCC), Well Data downloaded in September 2016, only one well has been drilled within 2 miles of the proposed WSR suitable segments. This well was a wildcat well near Placerville, drilled in 1960 and was [Idquo]DA: dry and abandoned.[rdquo]
- o SMC Note: SMC finds that the negative impacts to the San Miguel River, Beaver Creek, and Saltado Creek corridors, scenic byways, traffic, recreation, visual resources, and wildlife in an area without any oil/gas infrastructure, identified oil/gas fields, and history of interest or past production far outweighs any possible benefits from resource exploration or extraction within this area. According to the Fluid Minerals Alt D code in the Fluid Minerals Alt D shapefile²³, the entire San Miguel River Segment 1, Beaver Creek, and Saltado Creek WSRs, and the existing and expanded San Miguel ACEC and San Miguel SRMA is coded as NSO for the preferred alternative. However, this stipulation seems to be missing from the WSR Alt D shapefile attribute table²⁴. Alternative B gives all these areas the stipulation of "NL" which is preferred by San Miguel County as it conserves valuable staff time and resources from even going through the federal lease process.
- ? "RANGE" = Closed to livestock grazing.
- o SMC Note: essentially already recommended in Alternatives B and D. This is a high conflict area with many uses constrained in a narrow canyon. Monsoonal rains cause road closures, debris flows, and rockfalls multiple times each summer. Grasses and forbs should not be grazed as they provide protection. Wildlife needs this food source.
- ? "RECMINE" = No recreational mining.
- o SMC Note: SMC has found recreational mining is disruptive to other quiet uses, wildlife, and has caused conflicts with public access, boating, fishing, hiking, photography and other quiet use activities within the San Miguel River corridor. Non-motorized recreational mining does not have the same level of impact and

disruption to the aquatic and riparian ecosystems as motorized recreational mining. San Miguel County believes that to protect the WSR, ACEC, SRMA, and highly scenic and important riparian and aquatic ecosystems, there should be no motorized recreational mining on the San Miguel River Segment 1, and the Beaver and Saltado Creek segments found suitable for WSR designation.

? "SALABLE" = Closed to salable mineral disposal.

23http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/shape_files_1.Par.20291.File.dat/fluid_minerals_alt_

d.z ip

24http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/shape_files_3.Par.28698.File.dat/WSR_ALT_D_FINAL.

zip

o SMC Note: Gravel and dimension stone mining is not consistent with the ORVs and ACEC riparian values.

? "SEED" = Area closed to seed collection.

? "SHEEP" = Grazing of sheep and goats not permitted

o SMC Note: essentially already recommended in Alternatives B and D. SMC Note: This is a high conflict area with many uses constrained in a narrow canyon. Monsoonal rains cause road closures, debris flows, and rockfalls multiple times each summer. Grasses and forbs should not be grazed as they provide protection. Wildlife needs this food source.

? "SOLARE" = Exclusion area for solar.

o SMC Note: Commercial solar concentrators or PV panels are not compatible with the WSR/SRMA/ACEC/scenic and wildlife values here. The San Miguel River corridor is determined to have [ldquo]Very Good[rdquo] Solar PV potential by the UFO BLM Renewable Energy Potential Report (2010), which doesn[rsquo]t take into account distance from substations. PV arrays for off-site uses need to be proximal to substations. 25

? "SOLID"= Closed to non-energy solid mineral leasing.

o SMC Note: Ground disturbing activities, such as surface mining, are not consistent with the ORVs, wildlife and ACEC values, nor the important scenic qualities.

? "SSR" = Site-Specific Relocation.

? "TAR"=Prohibit target shooting.

o SMC Note: Target shooting in the narrow rock-walled canyons results in amplified noise and disturbances to the wildlife, birds and pristine experiences of these areas.

? "V-2"=VRM II

o SMC Note: WSR and San Miguel River Existing/Expansion ACEC should have a VRM II, as the DRMP/EIS states [ldquo]Managing the segments according to VRM Class 1 or II objectives would provide direct protection to segments with a scenic ORV by requiring that the alterations to the landscape be done so as not to dominate the viewshed. If alterations cannot be mitigated to reach the VRM class objective, they would not be permitted[hellip]In turn, this would provide indirect protection to segments with a cultural or historical ORV.[rdquo] 26 As noted elsewhere, the BLM 2013 ACEC Final Report states that the San Miguel existing and expansion ACECs should have VRM II.

o SMC Note: Beaver Creek was not provided any VRM stipulation in the WSR Alt D shapefile. WSR should have a VRM II.

? *"WINDE"=Exclusion area for the wind.

o SMC Note: The San Miguel River corridor is determined to have [ldquo]Poor[rdquo] wind potential by the UFO BLM Renewable Energy Potential Report (2010). 27

? "WOOD"=Closed to wood cutting.

25[http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_docs_1.Par.91799.File.dat/UFO_RenewEn](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_docs_1.Par.91799.File.dat/UFO_RenewEnergy_05-25-2010_508.pdf)

[ergy_05-25-2010_508.pdf](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_docs_1.Par.91799.File.dat/UFO_RenewEnergy_05-25-2010_508.pdf)

26Page 4-412;

http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_2.Par.12939.File.dat/4_UFO-DRMP-2016_508.pdf

27[http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_docs_1.Par.91799.File.dat/UFO_RenewEn](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_docs_1.Par.91799.File.dat/UFO_RenewEnergy_05-25-2010_508.pdf)

[ergy_05-25-2010_508.pdf](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_docs_1.Par.91799.File.dat/UFO_RenewEnergy_05-25-2010_508.pdf)

*All above stipulations apply where there is BLM surface estate, however, HYDROE, SOLARE, AND WINDE are not included as stipulations on the non-BLM surface estate (private, U.S. Forest Service lands).

We obtained definitions of these codes from BLM GIS metadata made available for each BLM UFO DRMP/EIS shapefile, such as the WSR Alt D shapefile metadata.²⁸

3. Special Recreation Management Areas (SRMAs) & Extensive Recreation Management Areas (ERMAs) Summary: There are two SRMAs discussed in the DRMP/EIS within San Miguel County: San Miguel River (which includes the San Miguel River Segment 1, Saltado Creek and Beaver Creek segments determined to be suitable for Wild & Scenic River designation in Alternative D; and Burn Canyon. We commented above that we desire to continue the designation of the San Miguel River SRMA. The San Miguel River SRMA already exists but the preferred Alternative D would add approximately 76 acres to this SRMA, just southwest of the confluence of Willow Creek and San Miguel River.

Specific to the Burn Canyon SRMA, we note that it is within the proposed Naturita Canyon EEA. The Burn Canyon SRMA is recommended in Alternative B, but not in the agency preferred alternative, Alternative

D. Under Alternative B, if designated, the Burn Canyon SRMA would have the following management stipulations:

SRMA Scenario (Alternative B)

²⁸[http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/shape_files_3.Par.87378.File.dat/WSR_ALT_D_FINAL.](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/shape_files_3.Par.87378.File.dat/WSR_ALT_D_FINAL.html)

html

Figure 3.1 -- showing the Burn Canyon SRMA Alternative B scenario.

It would have travel restricted to mostly designated routes, portions (purple) would be closed to mechanized (bikes) and motorized vehicles, and would not allow competitive events. It would be closed to coal and solid mineral leasing, the BLM would petition for withdrawal of locatable minerals, and there would be no surface occupancy for oil and gas. It would have VRM II.

Targeted activities would be hiking and horseback riding and enjoyment of nature in the canyons. On the mesa tops and slopes, activities would also include mountain biking.

Under the agency preferred ERMA in Alternative D, the ERMA would have VRM III and controlled surface use for oil/gas development only. The SRMA and ERMA have the same boundary. However, under the ERMA scenario, the lands would be managed to allow ATVs and motorcycles, mountain biking, and hiking in both the canyons and the mesa top/slopes, while retaining a natural appearing landscape and providing necessary recreation facilities such as trails/trailheads/staging areas/signage to facilitate recreational activities. 29

29Pages J-5-7; J-91;

http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_appendix0.Par.40130.File.dat/J_Rec_UFO-DRMP-2016_508.pdf

ERMA Scenario (Alternative D)

Figure 3.2 -- showing the Burn Canyon SRMA Alternative D scenario.

San Miguel County desires that the Burn Canyon SMRA as mapped and stipulated in Alternative B be approved and incorporated into the final RMP. We believe that the SRMA will complement the proposed Naturita Canyon EEA as mapped and recommended in Alternative B, along with the fluid minerals stipulations from Alternative B in this area.

4. Enhanced Ecological Areas (EEAs)

A. San Miguel EEA.

The BLM UFO DRMP/EIS contemplates two EEAs within San Miguel County: San Miguel EEA and Naturita Canyon EEA. 30 The San Miguel River Expanded ACEC preferred by San Miguel County, the existing San Miguel SRMA and the Alternative D recommended WSR segments for San Miguel River Segment 1,

30Pages D-3 & D-4;

http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_appendix.Par.39615.File.dat/D_EEAs_UFO-DRMP-2016_508.pdf

Beaver Creek and Saltado Creek. San Miguel County recommended a standardized set of stipulations (pages 7-9 of this document) that would meet the needs of all of these San Miguel County desired designations, and also meet and exceed the stipulations that had been proposed by the BLM for the San Miguel EEA.

B. Naturita Canyon EEA.

The BLM describes the reasons for considering Naturita Canyon EEA on Page D-4 of Appendix D of the DRMP/EIS as:

Geographically, there are several parcels mapped as comprising the Naturita Canyon EEA for Alternative

B. The purple and red polygons (see figures below) make up the Naturita Canyon EEA. It would provide linkages between adjacent State land (blue) and National Forest land (green). The hatching shows occupied critical Gunnison Sage-grouse habitat as designated by U.S. Fish and Wildlife Service (USFWS). The DRMP/EIS does not list Gunnison Sage-grouse (GuSG) as a species that the EEA would be managed to benefit.

Figure 4b.1 -- Showing the Naturita Canyon EEA Alternative B.

In Alternative D, the agency preferred alternative, only the two red parcels of the Naturita Canyon EEA would actually be designated as an EEA:

Figure 4b.2 is showing Naturita Canyon EEA Alternative D and Colorado Oil and Gas Commission (COGCC) wells.

Above, the BLM surface that would not be part of the Naturita Canyon EEA is shown in yellow. We also show oil and gas wells, with green wells being producing oil or gas wells, and red wells being mostly wildcat wells that are non-producing. An EEA consisting of just the red polygons, especially with simply controlled surface use (CSU) and ROW avoidance (AVOID), instead of no surface occupancy (NSO), designated routes- timing limitations (DR_TIMING), seems this would result in two small token EEA parcels without meaningful habitat protection or connectivity, beyond what is already anticipated by the fluid minerals management in Alternative D. Most of these two polygons are already anticipated to be

NSO. However, the remainder of the area that is analyzed for Naturita Canyon EEA is CSU under alternative D.

Alternative D, agency preferred, for Naturita Canyon EEA and fluid minerals stipulations:

Figure 4b.3 -- showing the Naturita Canyon EEA Alternative D with fluid minerals Alternative D

Alternative B, San Miguel County preferred, for Naturita Canyon EEA and fluid minerals stipulations:

Figure 4b.4 showing Naturita Canyon Alternative B and fluid minerals Alternative B.

San Miguel County believes that since the wildlife values warranted studying the Naturita Canyon area for an EEA, that Alternative B for the EEA boundary and EEA stipulations, as well as Alternative B fluid

minerals stipulations, should be applied by the final decision in this area. We could not locate a discussion in the DRMP/EIS explaining the BLM rationale for how choosing Alternative D over Alternative B with respect to this EEA and the fluid minerals stipulations that overlap, would achieve the stated objectives of preserving the continuity of habitats, vegetation communities, and native wildlife. 31

San Miguel County recommends that the full Naturita Canyon EEA be designated, as mapped in Alternative B, along with Alternative B fluid minerals stipulations. This will be complimented by also designating the Burn Canyon SRMA as mapped in Alternative B.

5. Areas of Critical Environmental Concern (ACECs)

The UFO DRMP/EIS contemplates three ACECs within San Miguel County:

A. San Miguel River ACEC and San Miguel River Expansion ACEC.

These ACECs have been discussed in detail in this document above, and San Miguel County strongly supports Alternative B, which would designate the additional lands within the San Miguel River Expansion ACEC. According to the BLM's Final ACEC report (2013), all of the relevance and importance criteria were met, just as with the existing San Miguel River ACEC. 32 San Miguel County also strongly supports a cohesive management of the overlapping ACEC lands, SRMA lands, and WSR segments within San Miguel River Segment 1, Beaver Creek and Saltado Creek through one set of stipulations, with a VRM II stipulation. The agency preferred VRM III stipulation does not adequately protect the exceptional scenic qualities of this area, nor the regional economy, nor the viewshed of the two state-designated Scenic Byways. Please see this document, Section 3, pages 5-9 above for specific requests for changes and implementation that San Miguel County desires in the final decision.

B. San Miguel Gunnison Sage-grouse ACEC.

This ACEC is comprised of 470 acres in multiple parcels occurring on scattered critical Gunnison Sage- grouse habitat that whose surface estate is managed by the BLM. San Miguel County was originally one of the proponents of this ACEC. When the BLM's Final ACEC report was published in 2013, this was prior to the federal decision to list the Gunnison Sage-grouse as Threatened and designate critical habitat in 2014.

On November 12, 2014, the U.S. Fish and Wildlife Service (USFWS) announced that it determined that the Gunnison Sage-grouse, a ground-dwelling bird found only in southwestern Colorado and southeastern Utah, required the protection of the Endangered Species Act (ESA) as a threatened species. The USFWS originally proposed to list the species as [§]endangered[§] under the ESA in January 2013, but efforts by the two states, tribes, local communities, private landowners and other stakeholders to conserve the species and its habitat were found to have helped reduce the threats to the bird sufficiently to give it the more flexibly protected status of [§]threatened.[§] 33

The supporting EIS for the Threatened Status designation of the Gunnison Sage-grouse³⁴ and for the Designation of Critical Habitat for the Gunnison Sage-grouse³⁵ is dated November 9, 2014.

31Pages 2-68 & 2-69;

http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_1.Par.31726.File.dat/2_UFO-DRMP-2016_508.pdf

32Pages 41-47;

http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_docs_1.Par.52182.File.dat/ACEC%20Report

%20Final%2001152013.pdf

33[https://www.fws.gov/mountain-](https://www.fws.gov/mountain-prairie/pressrel/2014/11122014_ServiceProtectsGunnisonSageGrouseAsThreatenedUnderESA.php)

[prairie/pressrel/2014/11122014_ServiceProtectsGunnisonSageGrouseAsThreatenedUnderESA.php](https://www.fws.gov/mountain-prairie/pressrel/2014/11122014_ServiceProtectsGunnisonSageGrouseAsThreatenedUnderESA.php)

34[https://www.fws.gov/mountain-](https://www.fws.gov/mountain-prairie/species/birds/gunnisonsagegrouse/GUSGFinalListingRule_11202014.pdf)

[prairie/species/birds/gunnisonsagegrouse/GUSGFinalListingRule_11202014.pdf](https://www.fws.gov/mountain-prairie/species/birds/gunnisonsagegrouse/GUSGFinalListingRule_11202014.pdf)

35https://www.fws.gov/mountain-prairie/species/birds/gunnisonsagegrouse/GuSGCriticalHabitat_11202014.pdf

The Gunnison Sage-grouse ACEC as proposed in this UFO DRMP/EIS does not contemplate the status of the species or critical habitat as listed in the federal register in 2014, does not contemplate surface disturbance and other disturbances on critical habitat that may be non-BLM surface estate but is BLM- managed federal mineral estate, and does not contemplate guidelines within numerous plans and the latest best management practices for stipulations and buffers from leks.

The UFO DRMP/EIS does not take into consideration that Occupied GuSG Habitat includes specific properties (and split estate) that the USFWS excluded from the critical habitat designation. The political removal of surface lands coinciding within these specific private properties under conservation easements from listed critical habitat is appropriate, but the removal of subsurface public lands from Occupied Habitat is not appropriate because it excludes the subsurface mineral estate from the management actions contained in the UFO DRMP/EIS.

A. In summary, San Miguel County does not support the Gunnison Sage-grouse ACEC as proposed in Alternative B of this UFO DRMP/EIS. The proposed alternatives with regards to Gunnison Sage-grouse and this ACEC are neither adequate, accurate, nor informed by the most recent federal actions and data available. The UFO DRMP/EIS also predates the new alternative B analysis within the GuSG DRMPa/DEIS which analyzes an ACEC for all GUSG Occupied and Unoccupied Habitat. Please see Section 6, Gunnison Sage-grouse.

6. Gunnison Sage-grouse.

These designations prompted a process for the BLM to prepare a draft Gunnison Rangewide Plan Amendment that would potentially result in multiple resource plan amendments (GuSG DRMPa) and a companion draft environmental impact statement (GuSG DEIS) which more closely analyzes planning issues, including energy and minerals actions, in order "to analyze the addition of GuSG conservation measures to several existing RMPs", including the BLM UFO DRMP/EIS. The deadline for comments on the GuSG DRMPa is after the deadline to comment on this UFO DRMP/EIS. The GuSG DRMPa documents were released as drafts in August 2016.

In the GuSG DRMPa, the BLM states, "The BLM manages approximately 40 percent of GUSG habitat across twelve counties in southwestern Colorado and southeastern Utah[hellip]The inadequacy of regulatory mechanisms in land use plans was identified as a major threat in the FWS listing decision." 36

We realize that since much of the UFO DRMP/EIS work occurred between 2010 and 2013, that the latest work done by the USFWS and BLM for the GuSG DRMPa was not incorporated into this UFO DRMP/EIS. The San Miguel Gunnison Sage Grouse ACEC analysis was not informed by the latest information, nor the oil and gas stipulations, travel management and several other sections of this UFO DRMP/EIS.

Thus, if the UFO DRMP/EIS moves forward, it should have its Record of Decision signed prior to the BLM RMPa ROD so that the BLM RMPa will amend the relevant portions of this RMP to adequately protect Gunnison Sage-grouse and incorporate the latest science and best management practices. All leases within the UFO should be deferred until the ROD is signed for the GuSG RMPa so that no lease is allowed a 20-year period with out-of-date stipulations and practices. While the GuSG DRMPa goes much further than this UFO DRMP/EIS for incorporating protections, conservation measures, and habitat enhancement

36Page 1; <https://eplanning.blm.gov/epl-front-office/projects/lup/39681/78597/89605/2016->

0811_GUSG_Draft_RMP_Amendment_ePlanning.pdf

and connectivity measures, it still needs additional work, which San Miguel County will comment on separately under that comment process. The GuSG DRMPa does contemplate that removal of subsurface public lands from

Occupied Habitat management actions is inappropriate, which is differently than how these lands are treated in the UFO DRMP/EIS.

It would be remiss to issue leases under any circumstances within the UFO until there is a final decision on the Gunnison Sage-grouse amendments.

The Purpose section of the GuSG DRMPa states, "This RMP amendment provides a framework for conserving and assisting with the recovery of the GuSG and for conserving and restoring habitat upon which the species depends on BLM-administered public lands across the range of the bird." The Need section of this document states, "The BLM conducted land use plan evaluations in accordance with its planning regulations, which require that RMPs 'shall be revised as necessary based on [hellip], new data, new or revised policy[hellip](43 CFR 1610.5-6).'" 37

San Miguel County believes that the listing of the GuSG and designation of critical habitat is a new circumstance that requires modification of the UFO DRMP/EIS, but to be consistent where the San Miguel Basin population has key areas such as Miramonte Reservoir area that are split among the UFO and Tres Rios Field Office (TRFO) there needs to be a consistent set of management guidelines and stipulations across the entire San Miguel Basin population. There may be different lek buffers and needs between the different subpopulations, such as the Gunnison Basin and the San Miguel Basin populations.

Seasonal habitat has not been delineated within the San Miguel Basin population the way it has in the Gunnison population. The fact that the BLM is conducting the GuSG DRMPa/DEIS process and recommending a preferred alternative that would amend the TRFO RMP seems to point to that need. San Miguel County also does not agree that the range of alternatives analyzed in the 2013 TRFO RMP/FEIS nor this UFO DRMP/EIS is appropriate with respect to the needs of GuSG.

The range of alternatives considered in the GuSG DRMP/DEIS includes having the stipulation of No Surface Occupancy being applied to all BLM lands within 4-miles of a lek. These documents analyze all BLM lands within occupied, unoccupied or a 4-mile buffer of a lek as the decision area. Yet, the 2005 Gunnison Sage-grouse Rangewide Conservation Plan³⁸ and the presence of occupied critical habitat more than 4 miles from leks within the San Miguel Basin show that GuSG is found occupying habitat and using seasonal habitat 6 or more miles away from leks. ³⁹ For example, the occupied habitat within the Dry Creek Basin area, San Miguel Basin GuSG population, shown on Map 1 that is beyond the 4-mile lek buffer, is between 6- and 6.25-miles from leks. The BLM should allow for additional review of appropriate protections for Gunnison Sage-Grouse habitat from oil and gas development within at least a 6-mile buffer, preferably a 6.2-mile buffer of leks within the San Miguel Basin.

Section 7. Lands Identified For Disposal.

The DRMP/EIS states that in Alternatives B-D, the UFO's objective is to "consider disposal of lands that would consolidate public ownership for greater management efficiency while serving the public interest, including communities and their expanding needs." 40

37Page iii; <https://eplanning.blm.gov/epl-front-office/projects/lup/39681/78597/89605/2016->

0811_GUSG_Draft_RMP_Amendment_ePlanning.pdf

38<http://cpw.state.co.us/learn/Pages/GunnisonSagegrouseConservationPlan.aspx> 39Page J-5;

[http://cpw.state.co.us/Documents/WildlifeSpecies/SpeciesOfConcern/GunnisonSageGrouse/ConsPlan/AppendixJSGHabitat Use03.pdf](http://cpw.state.co.us/Documents/WildlifeSpecies/SpeciesOfConcern/GunnisonSageGrouse/ConsPlan/AppendixJSGHabitatUse03.pdf)

40Page 2-319;

http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_1.Par.31726.File.dat/2_U_FO-DRMP-2016_508.pdf

The lands identified for disposal were identified on Appendix A, Figure 2-6041 and legal descriptions were provided in Appendix N. 42 It appears that only the lands recommended for disposal under the agency preferred alternative D are shown in Figure 2-60.

We recommend that it would be very helpful for the reviewing public and agencies if the UFO made more readily available the Land Tenure/Land Disposal GIS files on the UFO RMP GIS web page, and also if the name of the county were provided in Appendix N. We were able to obtain from UFO GIS staff the land tenure shapefile via email. While actual reasons for recommending individual parcels for disposal or non- disposal in the four alternatives were not located in the DRMP/EIS, there were some cryptic rationales present within the land tenure shapefile attribute table for a few but not all parcels.

San Miguel County does not desire any parcels to be disposed of that would interfere with existing public roads or trails, existing private driveways or access roads, irrigation ditches or other easements. Any parcels disposed of should conform with the criteria and standards set forth in the San Miguel County Comprehensive Plan. Parcels that contain critical habitat for sensitive or listed species or that provide connectivity between other public lands should not be disposed of. If the BLM doesn't want to manage such parcels, then the adjacent federal or state agency should be given an opportunity for management or ownership.

The metadata from the land tenure shapefile for the 10 parcels analyzed by the DRMP/EIS for disposal within San Miguel County is below:

SMC Parcel

Ref #

RMP gis_ac

res alt

_A alt

_B alt

_C alt

_D alt_B_c

ode alt_C_c

ode alt_D_c

ode

Comment_

1 San Juan / San Miguel Planning

Area RMP 1985

35

Yes

No

Yes

No DISPOS

AL

Riparian

2 San Juan / San Miguel Planning

Area RMP 1985

35

Yes

No

Yes

No DISPOS

AL

Riparian

3 San Juan / San Miguel Planning

Area RMP 1985

214

Yes

No

Yes

No DISPOS

AL

Range, Veg, Riparian

4 San Juan / San Miguel Planning

Area RMP 1985

88

Yes

No

Yes

No DISPOS

AL Range, Veg, Riparian,

Recreation

5 San Juan / San Miguel Planning

Area RMP 1985

82

Yes

No

Yes

No DISPOS

AL Range, Veg, Riparian,

Recreation

6 San Juan / San Miguel Planning

Area RMP 1985

38

Yes

Yes

Yes

Yes DISPOS

AL DISPOS

AL DISPOS

AL

7 San Juan / San Miguel Planning

Area RMP 1985

40

Yes

Yes

Yes

No DISPOS

AL DISPOS

AL

8 San Juan / San Miguel Planning

Area RMP 1985

41

Yes

Yes

Yes

Yes DISPOS

AL DISPOS

AL DISPOS

AL

9 San Juan / San Miguel Planning

Area RMP 1985

133

Yes

No

Yes

No DISPOS

AL salinity/selenium,

GuSG

10

2011 RMP

40

No

Yes

No

Yes DISPOS

AL DISPOS

AL

Table 7.1 -- the land tenure GIS shapefile attribute table for parcels within San Miguel County.

a. Fall Creek Area Parcels.

We attempted to map the legal descriptions of the parcels (SMC Parcel Reference #s 1 & 2 in the table above) within San Miguel County and found that these two of the parcels (in T42N R11W Section 2) were

41http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_appendix.Par.78374.File.dat

/App%20A%20Combined.pdf

42http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_appendix0.Par.77552.File.d

at/N_Disposal_UFO-DRMP-2016_508.pdf

just east of Little Cone, adjacent to Fall Creek Road, County Road 57 P (see pink outlines below). It appears these two parcels were currently listed for disposal by the existing RMP (Alternative A), and are not recommended for disposal in Alternatives B or D. They are located within the Fall Creek riparian corridor. San Miguel County agrees with the Alternative D (no disposal) for these parcels.

Figure 7a. Fall Creek area parcels in T42N R11W Section 2, not recommended by SMC or agency preferred Alternative D for disposal.

b. Beaver Creek and Saltado Creek Area Parcels.

We could not quite get the legal descriptions rectified for the parcels in Saltado Creek between Appendix N and the GIS land tenure file provided. However, the parcel within the Saltado Creek area intersects the Saltado Creek WSR segment, the existing ACEC and the SRMA. It also is adjacent to critical occupied Gunnison Sage-grouse habitat. It is within 1 to 2 miles of 3 active leks. It should not be disposed of.

The Beaver Creek parcel in T43N R12W Sections 9 & 10 is within the Beaver Creek WSR segment, existing ACEC and SRMA. It also is adjacent to critical occupied Gunnison Sage-grouse habitat. It is within 0.3 to

0.75 mile of 3 active leks. It should not be disposed of.

Both of these areas appear also to be within the San Miguel River Expansion ACEC (which San Miguel County recommends be designated. The DRMP/EIS states that in Alternatives B-D, the UFO's objective is to "retain lands in public ownership when it will serve the public interest, protect valuable resources, or achieve management goals." 43 Alternative B and Alternative D state that the UFO action will be to retain lands that are within ACECs or SRMAs. 44 Lands immediately adjacent to critical Gunnison Sage-grouse habitat should not be disposed of. The 2005 Gunnison Sage-grouse Rangewide Conservation Plan⁴⁵ and the presence of occupied critical habitat more than 6 to 6.25 miles from leks within the San Miguel Basin subpopulation show that GuSG is found occupying habitat and using seasonal habitat 6 or more miles away from leks. 46

43Page 2-321;

[http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_1.Par.31726.File.dat/2_U FO-DRMP-2016_508.pdf](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_1.Par.31726.File.dat/2_U%20FO-DRMP-2016_508.pdf)

44Page 2-322;

[http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_1.Par.31726.File.dat/2_U FO-DRMP-2016_508.pdf](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_1.Par.31726.File.dat/2_U%20FO-DRMP-2016_508.pdf)

45<http://cpw.state.co.us/learn/Pages/GunnisonSagegrouseConservationPlan.aspx> 46Page J-5;

[http://cpw.state.co.us/Documents/WildlifeSpecies/SpeciesOfConcern/GunnisonSageGrouse/ConsPlan/Appendix JSGHabitat Use03.pdf](http://cpw.state.co.us/Documents/WildlifeSpecies/SpeciesOfConcern/GunnisonSageGrouse/ConsPlan/Appendix%20JSGHabitat%20Use03.pdf)

Figure 7b. Showing the Beaver Creek (left) and Saltado Creek (right) area disposal parcels in T43N R12W Sections 9 & 10; not recommended by SMC or agency preferred Alternative D for disposal. If sold for private development, there would be impacts to the scenic and primitive qualities of these areas, as well as the important riparian ecosystem and wildlife. Alternatives B and D do not recommend these parcels for disposal. San Miguel County believes it is best for the public and for the protection of valuable river corridors, ORVs, and Gunnison Sage-grouse if these parcels are not disposed of.

c. Lone Cone & Gurley Reservoir Area Parcels.

The BLM land tenure shapefile identified 3 parcels in the Lone Cone/Gurley Reservoir area that are recommended for disposal under the agency preferred Alternative D (according to the shapefile attribute table). They are shown with the bright blue highlight around the pink parcel boundaries in Figure 7c below:

Figure 7c. Lone Cone Reservoir and Gurley Reservoir Area Parcels identified in GIS metadata within the provided land tenure GIS shapefile as being recommended for disposal in the agency preferred Alternative D.

Appendix N only recommends two parcels for disposal in the agency preferred Alternative D. So we are concerned that there is an error in mapping the southernmost parcel on Figure 7c. It appears to be within T43N R13W S12. However, this does not match a legal description in Appendix N. Appendix N, and the land tenure shapefile should be rectified before the final RMP and ROD. The southernmost parcel is entirely surrounded by Gunnison Sage-grouse occupied habitat and is also mapped on top of (or under?) the Lone Cone Reservoir. This parcel is within 0.5 miles of an active lek and 0.7 miles of a second inactive lek. San Miguel County does not support disposal of this parcel.

The parcel directly west of Gurley Reservoir (just south of Red Cone Rd.) is the parcel with the legal description of T44N R13W Section 35. The parcel directly north of Gurley Reservoir in the northern portion of Figure 7c is the parcel with the legal description of T44N R13W Section 35.

The northernmost parcel in Section 24 is 1.5 miles north of occupied Gunnison Sage-grouse habitat but is also surrounded by private land. It is 3.5 miles from the nearest active lek and 2 miles from the nearest inactive lek. If a parcel were to be disposed of, this would probably be the only parcel that makes sense. There are some undesignated BLM routes mapped on the fringes of this parcel.

The parcel in Section 35 is within 0.5 miles of an active lek and is adjacent to occupied Gunnison Sage- grouse critical occupied habitat. There is an undesignated BLM route mapped on this parcel. San Miguel County does not recommend disposal of this parcel.

d. Hastings Mesa Area Parcel

One additional isolated BLM parcel was analyzed for disposal is located on Hastings Mesa near Alder Creek in T44N R10W Section 29 adjacent to the Alder Creek Ranches subdivision. This parcel is entirely surrounded by

private land. It was recommended for disposal in Alternatives A-C. However, no reason is given why it is not included for disposal in the agency preferred Alternative D. It is close to the Alder Creek riparian area. We would like an opportunity to review this parcel further with the UFO to examine it with respect to our Comprehensive plan, public rights of way, easements and other items, and to understand the UFO rationale for not including it for disposal in Alternative D. San Miguel County desires that if the BLM disposes of parcels it ensures there are either public ROW or private easements already in place prior to disposal, to ensure ingress/egress for future owners.

Figure 7c. Hastings Mesa/Alder Creek Area Parcel within T44N R10W Section 29. This parcel is not recommended for disposal in the agency preferred Alternative D.

e. Big Bear Creek Area Parcels

These parcels are within T42N R10W Section 4. Under the agency preferred alternative they are not recommended for disposal. San Miguel County agrees that they should not be disposed of by the BLM. They are within the Big Bear Creek riparian corridor, and the San Miguel River Expansion ACEC desired to be designated by San Miguel County. The San Miguel SRMA boundary should be expanded to match the San Miguel River Expansion ACEC boundary in this area.

Figure 7e. Showing the Big Bear Creek Area parcels. If sold for private development, there would be impacts to the scenic and primitive qualities of these areas, as well as the important riparian ecosystem and wildlife. Alternatives B and D do not recommend these parcels for disposal. San Miguel County believes it is best for the public and for the protection of valuable river corridors and riparian habitat if these parcels are not disposed of. The San Miguel River Expansion ACEC should be designated, and it would include these parcels. The San Miguel River SRMA boundary should be expanded to include all of these parcels and the expansion ACEC.

Section 8. Wildlife management.

San Miguel County urges the BLM to further consult and consider the Colorado Parks and Wildlife (CPW), formerly Colorado Department of Wildlife (CDOW), detailed list of Best Management Practices (BMPs) for oil and gas development titled "Actions to Minimize Adverse Impacts to Wildlife Resources." with

species-specific BMPs, including recommendations on protective buffers, timing information, and recommendations on surface density caps, referenced in their letter to BLM State Director Helen Hankins dated December 13, 2010.

We appreciate the statement in the DRMP/EIS on Page I-11 of Volume 147 that says "The BLM will consult with Colorado Parks and Wildlife (CPW). The RMP will recognize the State's responsibility and authority to manage wildlife." At the UFO RMP co-operator meeting in Montrose on October 15, 2016, we heard CPW staff say that their information was not incorporated into at least one alternative and that the RMP has not included BMPs, timing limitations or stipulations offered by CPW.

San Miguel County supports CPW's desire that at least a "No Surface Occupancy" (NSO) stipulation be applied to all Federal minerals within the boundaries of State Wildlife Areas (SWAs) and State Park boundaries to balance mineral extraction with the protection of surface resources.

San Miguel County has assisted in the protection of thousands of acres of private lands with important wildlife habitat values, including GuSG critical habitat, during the last few decades by participating in the acquisition of conservation easements intended to preserve and protect GuSG habitat. San Miguel County has contributed

between roughly \$1.4 and \$1.6 million during this period for habitat conservation and improvements through the County's Land Heritage Program, co-funding of the GuSG working group, and other actions to benefit GuSG.

U.S. Fish and Wildlife Service did not include in its final listed critical habitat private lands that were under conservation easement. However, the BLM states in the GuSG DRMPa on Page ii, in the introductory discussion of occupied habitat for Gunnison Sage-grouse⁴⁸ that "Occupied Habitat includes specific properties coinciding with BLM-administered federal minerals that the [US] FWS excluded from critical habitat designation. While the removal of surface lands with these properties from critical habitat is appropriate, the removal of subsurface public lands from Occupied Habitat is not." In other words, the BLM in its GuSG DRMPa understands that subsurface mineral estate actions should not be precluded from management actions. San Miguel County requests that the UFO RMP obtain from San Miguel County our GIS shapefile and database of private land conservation easements, and where split estate managed by the BLM exists, that the BLM implement NSO and other stipulations consistent with the primary conservation easement values on these properties.

San Miguel County supports CPW in their statement in the 2010 letter, "As the surface density of development increases beyond one well pad per section, literature sources strongly suggest that avoidance and minimization measures alone are no longer sufficient to address adverse impacts to some species, and compensatory mitigation is necessary to offset the permanent loss of wildlife resources." We support the concept that the UFO (and Tres Rios) RMP incorporate ways to obtain compensatory mitigation when surface density exceeds one well pad per section (within habitats identified by CPW).

San Miguel County requests that the UFO examine carefully CPW recommended species-specific stipulations and ensured that the stipulations in the final UFO RMP/ROD meet or exceed the recommended species-specific stipulations. We also request that standards and guidelines be developed for oil and gas activities in Gunnison Sage-grouse habitat, mule deer winter range, raptor nesting areas, bighorn sheep lambing areas, lynx denning and winter foraging habitat to address impacts from oil and gas operations to the maximum extent possible. Such standards and guidelines within these habitats should require that operators use the best technically and economically available development technology to meet the intent of guidelines while acting on a right to develop a lease.

47Page I-11;

[http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_1.Par.7326.File.dat/1_UF O-DRMP-2016_508.pdf](http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_1.Par.7326.File.dat/1_UF%20DRMP-2016_508.pdf)

48Page ii; [https://eplanning.blm.gov/epl-front-office/projects/lup/39681/78597/89605/2016-](https://eplanning.blm.gov/epl-front-office/projects/lup/39681/78597/89605/2016-0811_GUSG_Draft_RMP_Amendment_ePlanning.pdf)

[0811_GUSG_Draft_RMP_Amendment_ePlanning.pdf](https://eplanning.blm.gov/epl-front-office/projects/lup/39681/78597/89605/2016-0811_GUSG_Draft_RMP_Amendment_ePlanning.pdf)

San Miguel County requests that the UFO RMP also consider adding winter range to ungulate protection strategies, which we understand has implications across all management activities. CPW has strongly recommended the use of deer and elk winter range as defined in CPW species mapping when applying protection strategies for deer and elk in RMP documents in Colorado⁴⁹. CPW states, "Winter concentration areas and critical winter range are more narrowly defined subsets within the broader winter range category that fail to capture the totality of important wintering areas for ungulates. 'Winter Range' is defined as that part of the overall range where 90% of individuals reside during five winters out of ten. During an 'average' winter, animals residing in 'winter range' are no less sensitive to disturbance than those on severe winter range or winter concentration areas."

San Miguel County requests revisions to the DRMP/EIS and stipulations to acknowledge the increasing body of evidence that Timing Limitation Stipulations on oil and gas development activities are not adequate to protect winter habitats and migratory corridors for big game, and that additional limitations on the density of surface facilities may be necessary to maintain big game populations in developing areas. 50,51,52,53,54

San Miguel County further requests that a Master Leasing Plan be prepared and implemented as required by BLM IM No. 2010-117.

Section 9. Watchable Wildlife Viewing Areas.

Incorporating a watchable wildlife viewing area under the federal Watchable Wildlife Program to foster education and appreciation of wildlife in their habitats would be a positive addition within the UFO. When there are enhanced opportunities for public and educational institutions like local and regional schools to view, enjoy, and learn about wildlife, then there are tangible positive benefits for the local and regional economies and for appreciation of the national treasure that our public lands are. When people know about the needs and impacts of human activities on species, then they are more likely to support resource conservation and the hard choices of altering human activities that lead to climate change.

The San Miguel River is identified as being a very rich terrestrial bird habitat within North America by the BLM, the Audubon Society, and others. ⁵⁵ San Miguel County supports the concept of studying the San Miguel River ACEC and San Miguel River Expansion ACEC for creating one or more watchable wildlife viewing areas. We believe this will actually help with future mitigation of threats such as invasive plants, non-native species, feral cats, and other disturbances. The scenic qualities of this area also further enhance the potential high-quality viewing experience.

49Such as in the CPW San Juan Plan Revision comment letter dated April 11, 2008 titled "San Juan Public Lands Center, Draft

Land Management Plan and Draft Environmental Impact Statement, 72 Fed. Reg. 71148 (December 14, 2007)" and addressed to the San Juan Plan Revision, P.O. Box 162909 Sacramento, CA 95816-2909.

50<http://fwpiis.mt.gov/content/getItem.aspx?id=35572>

51http://www.wyofile.com/wp-content/uploads/2011/04/Deer.2010annualreport_muleddeer.pdf

52<http://onlinelibrary.wiley.com/doi/10.2193/2008-478/abstract>

53<http://www.blm.gov/style/medialib/blm/wy/information/NEPA/pfodocs/anticline/revdr->

[comments/eg.Par.10425.File.dat/02Bio-attach1.pdf](#)

54<https://www.fws.gov/southwest/ES/Documents/Oil-Gas-Fragmentation-Wilbert%20et%20al%202008.pdf>

55Page 3-171;

http://www.blm.gov/style/medialib/blm/co/field_offices/uncompahgre_field/rmp/rmp_draft_vol_1.Par.96289.File.dat/3_U_FO-DRMP-2016_508.pdf

We appreciate your consideration of these comments for the Uncompahgre Field Office Draft Resource Management Plan/Environmental Impact Statement. As we have offered specific requests, we hope the final RMP and ROD will not simply take the recommendations of a single alternative but will create a final hybrid decision that will incorporate our specific requests.

Respectfully,

ATTACHMENT A: RESOLUTION 2015-009 ATTACHMENT B: COMPARISON TABLES

RESOLUTION OF THE BOARD OF COUNTY COMMISSIONERS OF SAN MIGUEL COUNTY, COLORADO,
PUBLICLY STATING THE VALUE OF PUBLIC LANDS TO THE COUNTY'S ECONOMY, RECREATION,
HERITAGE, AND QUALITY OF LIFE; AND OPPOSING ANY EFFORT TO CLAIM, TAKE OVER, LITIGATE
FOR, OR SELL OFF FEDERAL PUBLIC LANDS WITHIN SAN MIGUEL COUNTY, COLORADO

Resolution #2015 - '1

WHEREAS, San Miguel County includes many beautiful, natural landscapes, including mountains, rivers, forests, lakes, basins and plateaus; and

WHEREAS, many of those stunning places are public lands owned by all Americans; and

WHEREAS, public land under the management of the U.S. Forest Service and U.S. Bureau of Land Management constitutes more than 60% of the land in San Miguel County; and

WHEREAS, these federal public lands are essential to the quality of life in San Miguel County, providing public recreational opportunity for wildlife watching, hiking, hunting, fishing, backpacking, horseback riding, skiing, bicycling, sightseeing, and numerous other outdoor recreational activities; and

WHEREAS, these federal public lands provide essential habitat for wildlife; and

WHEREAS, wildlife and the scenic landscape on public lands attract outdoor recreation and tourism that are the dominant drivers of San Miguel County's economy; and

WHEREAS, the unified, consistent management of Federal land by the Federal Land Agencies across the nation best protects the national value and utility of the public lands for all Americans and the values on which the economy in San Miguel County is dependent; and

WHEREAS, San Miguel County business owners attract employees in large part because of the iconic landscape

and recreational opportunities on federal public lands; and

WHEREAS, San Miguel County's agriculture industry includes numerous ranchers and sheepherders who depend on grazing on federal public land; and

WHEREAS, there is a broad consensus in San Miguel County of the need for effective management of our federal public lands and wildlife, and that collaborative approaches in which federal public land management agencies cooperate with Colorado Parks and Wildlife, San Miguel County officials, and our community are more likely to produce effective management than would ownership or management of federal public lands by the state of Colorado; and

WHEREAS, San Miguel County residents are actively collaborating among diverse interests and with public land managers to improve public land management and public access; and

WHEREAS, federal public land management agencies employ residents of San Miguel County who are passionate and expert at their jobs, despite lack of adequate federal funding, pay taxes, and contribute to our community; and

WHEREAS, Americans from throughout the county value these public lands as a part of our national

heritage and as our inalienable birthright as Americans; and

WHEREAS, San Miguel County's forests are naturally prone to fire, including periodic large-scale fires, as part of the ecosystem in which they have evolved over millennia, although a warming climate has accentuated the process; and

WHEREAS, federal money and expertise to suppress wildfires is essential to protecting our communities, infrastructure, and public lands.

NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of San Miguel County, Colorado, as follows:

That the Board of County Commissioners opposes any effort to claim, take over, litigate for, or sell off federal public lands within San Miguel County except pursuant to legislative processes established by Congress in the Recreation and Public Purposes Act, National Environmental Policy Act, Federal Land Policy and Management Act, and other applicable federal laws, following public participation and site-based analysis of the wildlife, ecological and community implications of the proposed land transfer.

NOW, THEREFORE, BE IT RESOLVED by the Board of Commissioners of San Miguel County, Colorado, as follows:

1. The Board of County Commissioners strongly supports federal land management in San Miguel County and the irreplaceable value public lands bring to our county' s economy, recreation, heritage, and quality of life .
2. The Board of County Commissioners enthusiastically commends the dedicated federal employees who manage America' s public lands in San Miguel County, and the dedicated employees of Colorado Parks and Wildlife who manage wildlife in San Miguel County, in partnership with the federal public land managers.

DONE AND APPROVED by the Board of Commissioners of San Miguel County, Colorado, at a duly noticed public meeting held in Telluride, Colorado, on March 25, 2014.

BOARD OF COUNTY COMMISSIONERS San Miguel County