AGENDA ITEM or FINAL CONTRACT REVIEW SUBMITTAL FORM

Agenda Item: Ratification of Correspondence; U.S. Forest Servic

Action Requested:

Parties to the Agreement:

Term Begins: **Term Ends:** **Grant Contract #:**

Summary:

Please see the attached comments for ratification

Fiscal Impact:

Submitted by: Josh Ost **Submitter's Email Address:** jost@gunnisoncounty.org

Finance Review: ○ Required ◉ Not Required

Comments:

Reviewed by: Discharge Date:

County Attorney Review: ○ Required ◉ Not Required

Comments:

Reveiwed by: Discharge Date: Certificate of Insurance Required

Yes ○ No ○

County Manager Review:

Comments:

Reveiwed by: GUNCOUNTY1\mbirnie Discharge Date: 6/1/2018

◉ Consent Agenda ○ Regular Agenda ○ Worksession Time Allotted: 0

Agenda Date: 6/5/2018

Revised April 2015

Gunnison County
COLORADO

Gunnison County Board of County Commissioners
Phone: (970) 641–0248 • Fax: (970) 641–3061
Email: bocc@gunnisoncounty.org • www.GunnisonCounty.org

June 1, 2018

Grand Mesa, Uncompahgre and Gunnison National Forests
Attn: Plan Revision Team
2250 South Main Street
Delta, CO 81416

RE: GMUG (Grand Mesa, Uncompahgre, Gunnison) Nation Forest Plan Revision #51806

GMUG Officials,

Gunnison County thanks you for the opportunity to comment on the Scoping Document that you have put out for feedback and released in March of 2018. As you are well aware, Commissioner Jonathan Houck has represented the Gunnison County Board of County Commissioners (BOCC) in public meetings and in the meetings of county officials from across the GMUG. The goal of this participation and our committed future participation is to be informed, understand and in turn provide meaningful feedback and input to the Forest Plan Revision. Commissioner Houck has shared feedback with the full BOCC and we offer the following comments from the full board after thoughtful discussion and review. We have used the documents provided by the USFS, the multi county meeting and the webinar information that has been readily accessible. You are in receipt of previous comments and thoughts from the draft forest assessments and please add these comments from our overview of the draft Scoping Materials.

GUNNISON COUNTY COMMENTS:

General Comments:

As we stated in earlier comments we are unsure of the definition of "forest wide". This plan is unique in that it creates future direction for the management of three forest (Gunnison, Uncompahgre and Grand Mesa) under the umbrella of one plan. We feel that the needs, characteristics, and management of these different forests need to be taken into account. We clearly understand the desire to have a succinct forest plan that helps manage a huge area of geographic variety but are concerned that it makes striking a balance in management for distinctly different needs an elusive balance to strike. Please know that this concern should be considered throughout our comments.

We need a clear definition of forest wide as the term is used throughout your scoping materials. Is it one of the three forest individually or is it the GMUG in its entirety?

Secondly, we cannot stress enough the need for a plan that has the ability to contemplate the technological changes in all areas of forest use and have the built in ability to adapt to these changes.

When considering the changes in recreation tools (mountain bikes, motorcycles, razors, quads, back country skis, etc.) oil and gas drilling equipment as well as the abundance of new uses in recreation that were almost unimaginable 20 years ago. Combine this with the abundance of campers, RV's, toy haulers and related things that are now considered normal accessories for the wilderness experience we must expect this evolution to continue and plan accordingly.

Continued and evolving development, funding and maintenance of infrastructure as well as expanded enforcement to handle the ever increasing use of public lands should be of the highest priority within the forest plan revision.

Part I: Forest Plan Vision, Roles and Contributions:

Gunnison County's understanding is that the vision statement was developed from input from the community outreach meetings that were held across the GMUG Communities during this planning process and from others held a few years back. We generally agree that the two areas of emphasis are Public Enjoyment and Utilization (of products and opportunities) on the forest.

While we feel these two areas cover the general roles and contributions we would like to articulate some distinct and important roles that the GMUG plan can and should offer to the Gunnison County community and beyond.

- Watershed Protections: The Gunnison National Forest, as a standalone forest unit represents a significant headwaters source of water and water resources of great importance to our county and the western US. The headwaters of this area feed and fill the Blue Mesa Reservoir/Aspinall Unit which is the largest body of water in the state. The importance of this holding facility for local and down river and down state uses cannot be overstated. The amount of positive impact healthy watersheds have on ecosystems as well as for human needs cannot be stressed enough in the need to manage healthy forest.
- Species Protections: It is important to our communities to develop a plan that has very thoughtful protections for species that are rare and/or special in their needs. Although limited in the jurisdiction of the USFS we desire to see protections and provisions for Gunnison Sage Grouse that equal or exceed the local efforts in our preservation efforts.
- Climate Change Resiliency: Winter recreation and snowpack are the keys to our economic sustainability in Gunnison County. A strong winter snowpack for recreation and then dependable run off for agricultural operations are of great concern to our constituents. We desire a GMUG plan that offers opportunities to address climate related issues.
- Community Support and Opportunity: We have seen an immense growth of forest use and users and need a plan that supports the growth and quality of life needs of the communities that are supported by public land use. As this state, and visitor numbers increase we desire a plan that considers and plans for issues that impact local communities as they adapt to this increased use. This should include development, appropriate funding and maintenance of applicable infrastructure to meet this ever evolving need.
- Scientific Research: We value your recognition of the Rocky Mountain Biological Lab (RMBL) in Gothic and the importance of its research. We suggest that the meaningfulness of its 90 plus years of research is more important than ever and that the resources needed to continue to support its work be enshrined in this new plan. Additionally, utilizing different areas of the GMUG for new and needed scientific research should be a priority.

- Agricultural Opportunities: Gunnison County desires continued opportunities for agricultural producers to have meaningful access and use to support their operations. The existence of agricultural operations in the Gunnison Basin contributes greatly to our quality of life and our intact landscape.

Part II: Key Needs for Change:

Provide Strategic, Adaptive Direction:

- We support the broad goals expressed in the scoping material. Stated was the use of remote sensing technology as "much as practicable". What defines practicable?
- We support that vegetation management should support outcomes, not methods.

Contribute to Social and Economic Sustainability:

- We agree with the scoping document in the increased use of recreation opportunities and overall visitor numbers to the forest. We want to see clear direction in how management and funding deficits will be addressed with this increase in use. We are concerned with sanitation issues in high use areas and lack of clear strategic planning to address these issues.
- We would like to see how the SBEADMR project will be incorporated into this plan. We support the prioritization of forest heal and safety in the WUI and recreation areas that drive local economies.
- Outdoor recreation on the forest is an essential social and economic element to Gunnison County. Developing, evolving and maintaining the necessary infrastructure is essential.
- Water resources in the Gunnison National Forest are the backbone of our existence. We would like to better understand how the plan revision prioritizes the protection, enhancement and long term health of water resources and consistent management of those resources.

Provide for Ecological Sustainability:

- We support the broad direction referenced in the scoping document

Maintain the Diversity of Plant and Animal Communities:

- We support the general direction of the scoping document and would like to suggest the inclusion of some very specific considerations for Gunnison Sage Grouse. Gunnison County has a long history and strong investment in supporting Gunnison Sage Grouse conservation. Based on that experience we offer the following:

    - The Gunnison Basin, Gunnison Sage-Grouse (GuSG) Candidate Conservation Agreement (CCA) should be a component of the revised GMUG Forest Plan. The USFS is signatory to this document. Consistent with our previous comments on "At-risk Species", Gunnison County recommends that the CCA be formally adopted into the GMUG Forest Plan.

    - Provisions of the Gunnison Basin CCA, such as invasive weed BMP's, should be incorporated into the GMUG Forest Plan in areas within GuSG occupied habitat within the forest boundaries.

    - The GMUG Forest Plan should be consistent with external plans for wildlife and other species at the local government (county) level, as well as state and federal levels.

- The listing of the Gunnison sage-grouse (GuSG) as threatened by the USFWS in 2014 is being litigated. Gunnison County cautions the USFS that using information from the litigated decision may result in invalidation of all or part of the planning process/outcome (GMUG Forest Plan Revision) for this species. Though USFS managed lands comprise a relatively small portion of GuSG habitat across the range of the species, the GuSG habitat it does manage is important to the species. Therefore we urge the USFS to use the best information available for this species, not just relying on the 2014 listing document.

- The USFWS is developing its own Species Status Assessment (SSA) for the Gunnison sage-grouse. It is our understanding that they are not using the threat analysis in their 2014 listing decision in developing that document. Though there are likely overlaps between the threat analysis being used for the USFWS SSA and the threats identified in the 2014 GuSG listing decision, we are aware of differences. We also note that the threats identified in the GuSG Range-wide Conservation Plan (GuSG RCP) differ in notable areas from those threats identified in the 2014 listing decision. We recommend that the USFS use the best available, most current threat information for the GuSG to best configure GuSG conservation actions within the GMUG Forest Plan Revision.

Integrate Resource Management for Multiple Uses and Ecosystem Services:

- We support the general direction of the scoping document in this area. We will use this opportunity to again, as a headwaters county largely under the management of the USFS, emphasize the need to focus on watershed health and protections of water quality.

Incorporate Best Available Science, Update to Existing Law and Policy:

- We support the general direction of the scoping document in this area. We believe this to also mean collaboration with other federal as well as state agencies and including the best available local knowledge and research.

Build an Accessible, Useful Plan:

- The scoping document offers that the current plan is "unwieldly and overly complicated" It is our desire that the new GMUG plan overcome those challenges but also have the adaptive strategies that allows the individual forest and communities to be best served by a plan that acknowledges these distinct difference.

Part III: Management Area Framework

Again, we will state our concern with understanding the definition of "forest wide" as used in this section of the scoping document. For Gunnison County does "forest wide" mean across the Gunnison National Forest or across the GMUG?

- **Natural Process Dominate:**
- **Special Areas and Unique Landscapes**
- **Backcountry, Including Non Upper Tier Colorado Roadless Areas**
- **Recreation Focus Areas/High Use Recreation Emphasis**
- **General Forest/Active Management**
- **Highly Developed Areas (non rec emphasis i.e.: utility corridors)**

For each of these six areas the scoping document only offered "tentative descriptions". Each of these areas is of concern and importance to Gunnison County. The Gunnison County Board of County Commissioners (BOCC) acted as conveners of the Gunnison Public Lands Initiative (GPLI) and have supported an inclusive collaborative that is currently still underway. The GPLI group has not reached the point of offering bill language but nonetheless, we look forward to their final proposal in the near future. Additionally, our County led Sustainable Tourism Outdoor Recreation (STOR) Committee is taking up issues of recreation management with our federal partners. Combine this with Crested Butte Mountain Resort being in our county and on the forest, we are very interested in what the scoping direction will be for the six areas noted above. We would ask for the opportunity to add additional comments and thoughts to the GMUG planning team at the time they flesh out these six areas in more detail.

Thank you for the opportunity to provide comment on the scoping document. We look forward to next steps and Gunnison County can be counted on to be a continuing partner in this planning process. We stand by and are prepared to clarify any of these comments if the forest service would so desire.

Best Regards,

Phil Chamberland, Chairperson

Jonathan Houck, Commissioner

John Messner, Commissioner