Town of Crested Butte

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-National Trust for Historic Preservation's 2008 Dozen Distinctive Destinations Award Recipient-

-A National Historic District-

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

Submitted via email to: gmugforestplan@fs.fed.us

December 4, 2017

Dear Scott Armentrout and the GMUG Forest Planning Team,

Thank you for undertaking such an extensive and complete assessment of the GMUG National Forest (GMUG) during this first phase of Forest Plan Revision. The work that the GMUG Planning Team has undertaken provides a thorough, foundational knowledge upon which the revised Forest Plan can be built. We appreciate the opportunity to comment at this stage of the revision and the GMUG's planning team's ongoing communication with our staff.

As we stated in our previous letter, the Town of Crested Butte (Town) is monitoring and participating in the Forest Plan Revision as we understand the social, economic, and physical health and wellbeing being of the Town is tightly linked with the context of the larger landscape. We are surrounded by Forest Service lands, and our municipal watershed protection area lies within the Forest Service boundary. Our primary concerns in Forest Plan revision are: 1) The need for increased recreation infrastructure and management, 2) The continued protection and cleanup of the Coal Creek and Slate River Watersheds, 3) The preservation of historic resources, and 4) The potential for climate change to detrimentally affect the Town's surrounding ecosystems and subsequently, the Town's social and economic wellbeing.

As we have reviewed the GMUG's Draft Forest Assessments, we have limited our comments to issues that could directly affect the wellbeing of the Town and the seven watersheds we generally consider to be the primary geographic areas of influence for the Town: Carbon Creek, Coal Creek, Slate River, Washington Gulch, East River, Brush Creek, Cement Creek, and Carbon Creek. General and specific comments on the draft assessments are attached below.

Sincerely,

Jackson Petito
Mayor, Town of Crested Butte

General Comments

The Town appreciates that many of the assessments explicitly seek to address three spatial scales: the context, plan, and local. The local scale is most relevant to the Town, with many of Forest-related issues we experience in Crested Butte not found uniformly across the communities in the Forest Plan area. Our reliance on outdoor recreation and tourism as an economic driver, as well as the intensity with which we are experiencing the increase in recreation use and its related impacts, set the Town, along with other resort communities, apart in the Plan Area. We appreciate the planning team's efforts to account for these localized differences in the assessments, while also seeking to address the issues in relation to the larger plan and context scales. Using this three-tiered spatial framework in all of the assessments could help ensure that the Forest Plan addresses both specific and broad influences on the Forest.

In addition, the Town would ask that the assessments seek to use data that fully reflects all three of these scales. Some of the assessments, including the recreation and socioeconomic assessments, rely heavily on the use of national or statewide datasets, or datasets that use methodology designed for a nationwide scale. Understanding how these datasets differ from or are corroborated by local data would make the plan a stronger tool at the local and site-specific scale. Many institutions in the Crested Butte area including the local municipalities, the county, the Rocky Mountain Biological Laboratory, the Crested Butte Land Trust, the Gunnison-Crested Butte Tourism Authority, and Western State Colorado University have data that could provide more accurate, localized information on the socio-economic, physical, and biological state of the Forest Plan Area, as well as the recreational usage.

Comments on Specific Assessments:

Recreation

1. The Town appreciates the recognition of partnerships as a valuable and important tool for addressing recreational issues. The Town is a willing partner in backcountry management issues and has already begun to invest significant resources in better maintaining our surrounding landscape. In 2018, the Town expects to spend $32,300 in planning for the development of a campground[1], water quality monitoring of the Coal Creek Watershed, and the trail maintenance through the Crested Butte Conservation Corps. The Town has $700,000 budgeted for the development of a campground, primarily designed to help alleviate backcountry pressure, in 2022[2]. Given that the Forest Service's funding needs exceed the funding availability for recreation management on the GMUG (pg. 40), and the Town's recognition of the surrounding landscape as an important economic driver for our community, we hope to further partner with the Forest Service as necessary. As part of this partnership, we hope to work with the Forest Service to strategically address backcountry issues across jurisdictions. The assessment does not mention of how partnerships are

[1] Further information on the Avalanche Park campground available online: http://www.crestedbutte-co.gov/index.asp?SEC={5A8E1B89-6D7F-4511-A443-F9D3D15A2D28}&Type=B_BASIC&persistdesign=none
[2] Town of Crested Butte Budget. Available online http://www.crestedbutte-co.gov/vertical/Sites/%7B6058FFBB-CB06-4864-B42F-B476F794BE07%7D/uploads/2018_Budget_Adopted.pdf

addressed in the current Forest Plan. If they are not included in the current Forest Plan, the Town would like to see a need for change statement explicitly addressing partnerships.

2. The Town sees a need for increased recreational infrastructure, including campsites, trailheads, and bathroom facilities. The Town is concerned with the potential infrastructure decommissioning referenced on page 33. The Town would ask the Forest Service only to decommission infrastructure that is no longer needed. If infrastructure is in disrepair but needed for recreational management, the Forest Service should look to partners and outside funding sources to maintain or rebuild the infrastructure, if internal funding is not available.
3. The Town is working with the Paonia Ranger District, Gunnison County, and Pitkin County Open Space on the development of the Carbondale to Crested Butte Trail[3]. This trail would make use of the Raggeds Trails from the top of McClure Pass to Erickson Springs. New trail construction is occurring in pieces from the Town of Crested Butte to Erickson Springs, along Kebler Pass. This trail could affect recreational use in the North Fork Area (pg. 10). Part of the Town's interest in this trail is its closely proximity to the West Elk Scenic Byway, of which the Town of Crested Butte is a partner.

Benefits to People

1. While the assessment does an excellent job describing the socio-economic conditions of the Forest Plan area as they currently exist, it does not describe how the economic conditions of the Forest Plan Area at large are expected to change in response to known trends. As the plan is expected to be used for at least fifteen years, additional informational on potential changes to broad-scale socioeconomic conditions, such as changing populations and economic drivers in local communities, supplementing the information provided on socio-economic changes on specific resources those directly related to the Forest, such as forage and fishing, seems relevant and necessary for the planning efforts. The Town of Crested Butte expects our socio-economic condition as a Town to change in coming years, likely affecting our relationship with the forest. Climate change, population growth, improved technology, and increased recreational use will all likely have significant effects on our local economy. While these trends will affect the Town's socioeconomics in different and sometimes competing ways, we expect to see shorter ski seasons, less wildflowers, more location-neutral businesses (especially with increased flight and broadband availability), increased visitation from Colorado's Front Range (particularly with the paving of Cottonwood Pass), and more demand for recreational facilities in coming years. Accounting for these predicted changes in the forest plan would make the plan more applicable to future conditions.

Terrestrial Ecosystems

1. The Town appreciates this assessment's focus on ecosystem resilience and climate change adaptation. The Town of Crested Butte is surrounded by high alpine ecosystems, which are expected to be highly vulnerable to climate change (pg. 127). Ensuring that these ecosystems can adapt, as best as possible, to climate is of high importance to the Town, especially given our reliance on the many ecosystem services they provide. As climate change adaptation is

[3] Potential route alignment maps are available from the Paonia Ranger District and the Town of Crested Butte.

central to the future management of terrestrial ecosystems on the GMUG, this information should be similarly central to the assessment and integrated within the report body, rather than in an appendix.

Water

1. The Town of Crested Butte has participated in cleanup efforts on the Coal Creek and Slate River Watersheds for many years. Continuing to cleanup these watersheds listed as 'impaired' by the Forest Service (Table 9. Page 17), and protecting them from further pollution, remain high priorities for the Town.
2. The Coal Creek Watershed is of particular importance to the Town as it provides the drinking water for the Town of Crested Butte. The Town supports the assessment's proposed need for change to include the delineation of municipal watersheds in the revised Forest Plan. The Town can provide maps and other resources on our municipal watershed protection area to assist with these delineation efforts (Page 28).

Energy

1. In the terrestrial ecosystem, aquatic and riparian ecosystems, water, invasive species, and rangeland assessments the Forest Service proposes 'need for change' statements that directly address the need to aid ecosystem adaptation and landscape resiliency in the face of increased pressure from climate change. While the Town understands that energy resources are politically fraught and regulated by a wide variety of legal and policy mechanisms, many of which are outside the scope of Forest Planning, we believe it is incongruent to simultaneously plan for climate change adaptation, while ignoring the ways GMUG activities are contributing to climate change. As the assessment states, GMUG greenhouse gas emissions cannot be directly tied to the ecosystem changes in the Forest induced by global climate change. However, the West Elk Coal Mine alone vented 2.347 billion cubic feet of methane in 2013[4]. The GMUG's contributions to emissions at a state level, are not insignificant. The Town suggests that the Forest Service include an additional 'need for change' statement in this assessment that addresses the need for the GMUG Forest to include the greenhouse gas emission potential in their decision-making related to energy resources. As the Town expects to face significant socioeconomic effects from climate change in coming years, many stemming from the changes in tourism and outdoor recreation on Forest Service lands, addressing climate change is a high priority for the Town.

Invasive Species

1. Invasive species not only have detrimental effects on native plant communities and the ecosystem services they provide, but can also have economic effects on local communities[5] The Town of Crested Butte is highly reliant on our natural alpine scenery as an economic driver via tourism. The Town also places high importance on our agricultural heritage, and

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[4]Colorado Energy Office, prepared by Ruby Canyon Engineering. "Coal Mine Methane in Colorado Market Research Report". March 2016. Available online: https://www.colorado.gov/pacific/sites/default/files/atoms/files/Coal%20Mine%20Methane%20Report%202016.pdf

[5] Frasier, W. Mitchell. 2014. "Economic Impact of Invasive Weed Species in Colorado: Phase I." Colorado State University. Available online: http://www.cwma.org/docs/2014%20Econ%20Impact.pdf

noxious weeds can cause significant costs to stockgrowers. The control of noxious weeds is important to the Town, not only for environmental, but also economic reasons.

2. The Town manages for noxious weeds through its Open Space Program. The Town suggests that the Forest Service plan to work with adjacent landowners, especially along travel corridors, to address noxious weeds. If the current plan does not address working with adjacent landowners and managers, this could be an additional 'need to change' statement. With the recent establishment of the Baxter Gulch trail, the Town hopes to partner with the Forest Service on the long-term weed control on this corridor.

Scenic Character

1. The Colorado State Legislature designated the Town of Crested Butte was named the Wildflower Capital of Colorado. Wildflowers are an important part of our scenic character and maintaining these resources into the future is a high priority for the Town. This could be added to page 4.
2. The Scenic Character map on page 30 seems to show the northern Slate River Valley as lower scenic character than the rest of the Crested Butte area, though the map is not high enough resolution to confirm the exact geographic location of the scenic character designations. The northern Slate River valley is home to the Paradise Divide, one of the best known scenic character resources in the Crested Butte area. Given the iconic nature of this area, the Town believes that it should have a high scenic character designation.

Cultural and Historic Resources

1. Historic resources in the greater landscape, besides their importance culturally, help to contextualize the Town's Historic District. As stated on page 18, very little of the GMUG has been surveyed for cultural resources. The Town encourages the GMUG to continue to survey and protect cultural resources into the future.
2. In addition to the important historical influences on page 5, skiing made an early and significant impact on the history of the Town of Crested Butte with the establishment of the Pioneer Ski Area in 1939 and Crested Butte Mountain Resort in 1960.