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Via email to: sarmentrout@fs.fed.us, cspeas@fs.fed.us, samanthajstaley@fs.fed.us, and brittanyduffy@fs.fed.us

Re: Comment Period on Forest Plan Assessment Report(s) and Need to Change Document

Dear Scott and the GMUG Forest Planning Team,

Congratulations on launching the Forest Plan revision for the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests. We're excited about the process and its possibilities, and look forward to working with you and the rest of the GMUG staff throughout this endeavor. We write today to emphasize the importance of taking the necessary time in the front end of the planning process to engage the public, consider feedback and build a strong foundation for the remainder of the planning process and subsequent adaptive management.

While we are aware that the GMUG is under significant pressure to expedite assessment and revision, the 2012 planning rule emphasizes strong public participation. Specifically, the rule requires opportunities for "the public to provide existing information for the assessment".¹ This should include ample time for the public to review and comment on draft assessment documents and the draft need to change document.

Assessment is a critical part of the planning process because it determines the need to change and provides the information on which the revised plan components and other plan content will be based.² Thus it is important to ensure adequate time for public review and comment. U.S. Forest Service planning directives provide the following direction for public participation in the review of the assessments:

1. The Interdisciplinary Team shall provide the following opportunities for public participation in the assessment: . . .

¹ 36 CFR 219.6(a)(2).

² 36 CFR 219.7(c)(2)(i).

b. During the development of the assessment, receive public input on specific elements of the assessment.

c. Make the draft assessment report available for public review and feedback during a specified time period. Notification that the draft assessment report is available for review should state that the assessment report will continue to be available for public review throughout the planning process.³

In addition, the National FACA Committee for the implementation of the 2012 planning rule issued recommendations in late 2015 suggesting that planning teams better address, incorporate and respond to relevant information submitted by the public during the assessment phase. Should the GMUG release its assessment of the 15 topics required by 36 CFR 219.6(b) as a single document, we request that you allow at least 60 days for public review and comment. Should the GMUG instead release the assessments of one to three of the topics at a time, as the Rio Grande National Forest did, we ask that you allow at least 30 days for comment on each group of assessments.

Following completion of the assessment, the GMUG will develop its draft need to change document. Identification of the need to change an existing forest plan is the first step in developing a revised plan,⁴ and robust public participation is needed to inform the process. We recommend that the GMUG allow sufficient time for public comment on the draft before developing EIS alternatives or releasing a proposed action. We recommend at least 30 days for this public review.

Forest Service Handbook Planning Directives support this:

Careful coordination of planning and NEPA procedures, particularly public participation, allows the Interdisciplinary Team to be more efficient by aligning planning tasks with the requirements of NEPA. Important opportunities to integrate planning and NEPA requirements include the following: . . .

2. Using the need to change the plan identified during the planning process to write the purpose and need statement for the environmental impact statement. Early in the planning phase, a preliminary need to change the plan is identified and public comment is sought to help develop the need to change the plan, which in turn helps focus plan development or revision.⁵

See also:

The Responsible Official should involve the public in the development of the need to change the plan by giving the public the opportunity to comment on a preliminary need to change before documenting the need to change the plan as part of the purpose and need in the environmental analysis documents for the plan development, plan revision, or plan amendment.⁶

And:

³ FSH 1909.12, section 42.11.

⁴ 36 CFR 219.5(a)(2).

⁵ FSH 1909.12 Chapter 20, section 21.13.

⁶ *Id.* at section 21.21.

3. When developing or revising a plan, the Responsible Official should invite public input on a preliminary need to change the plan (36 CFR 219.7(c)(2)(i)) so that:

- a. Public comments are used to improve the need to change the plan.
- b. The topics and concerns considered can be broadened or reduced as needed.⁷

For public comments to best inform and improve the need to change document, sufficient time should be allowed for public review of the draft.

Thank you for your attention to this matter. We look forward to reviewing and commenting on the draft assessment reports(s) and draft need to change document, and working with the GMUG as the planning process moves forward.

Best regards,

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