



Intermountain Forest Association

2218 Jackson Blvd, Ste 10, Rapid City, SD 57702
605-341-0875 Fax 605-341-8651

January 16, 2018

Mr. Scott Armentrout
GMUG NFs
2250 Highway 50
Delta, CO 81416

Dear Mr. Armentrout:

Recognizing the overall importance of the GMUG NFs Forest Plan and the need to be involved in the process as it is revised, Intermountain Forest Association (IFA) would like to submit the following comments regarding new wilderness recommendations. Furthermore, we expect to provide specific comments during the remaining process.

IFA feels strongly that additional wilderness will not benefit the landscape as a whole, and in fact, could be detrimental to the existing wilderness areas. Given that 48% of the GMUG is either already wilderness, or Colorado Roadless and therefore managed as wilderness, the ability to actively manage the forest is severely reduced. Once an area becomes a wilderness, it becomes very difficult to manage and given the existing current conditions and the likely changes associated with climate change, it is crucial to have the option and flexibility to use active forest management to achieve desired conditions for multiple objectives. This is especially true given the current insect and disease issues across the forest.

Additionally, it is important to recognize the economic impacts associated with increasing the amount of wilderness acres, while potentially reducing the number of acres where other types of activities can occur such as timber harvesting and other forms of recreation. There are several existing wood product businesses that rely significantly on wood from the GMUG, and if the amount of wood is reduced because of fewer harvestable acres, the long-term viability of these businesses could be compromised. If there are no businesses, the forest will lose its ability to effectively and efficiently manage their forests.

In terms of specific criteria, we have two primary concerns and recommendations, as well as one request:

1. We recommend that "timber harvest areas" include language regarding "suitable timber acres." As written, it is unclear if only those acres that have previously had timber harvested are excluded, or if all timber harvest areas (past and future) are excluded. We

recommend that all “suitable timber acres” be excluded from the wilderness inventory. Additionally, if areas outside of the “suitable timber acres” have previously been identified through NEPA (such as SBEADMR) as needing forest treatment, these areas should also be excluded.

2. We recommend that any Level 1 road that is used to access “suitable timber acres” or other NEPA identified treatment acres be excluded from the wilderness evaluation. Level 1 roads are critical to the forest management program and if lost to wilderness, could significantly impact the GMUG’s ability to implement active forest management.
3. As the process moves forward, we request that a map be developed that clearly shows any new proposed wilderness areas overlaid with the existing “suitable timber acres.” It is difficult to fully ascertain the impacts without seeing such a map.

In summary, we appreciate the work and time that you and your staff have put into the plan revision process to date, and we, at least partially, recognize the difficulties of trying to revise a national forest plan concurrent with constantly evolving planning regulations and direction. IFA feels strongly that one of the greatest assets of the GMUG is the current **balance** between varied interests including recreation, timber, range, community needs, and public safety and we hope that **balance** can continue into the future.

Thank you for this opportunity to review and comment.

Sincerely,

Molly Pitts

Molly Pitts
Intermountain Forest Association
Colorado Programs Manager