

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

April 24, 2018

RE: Grand Mesa, Uncompahgre and Gunnison Forest Plan Revision #51806 – 83 FR 14243

Dear Planning Team:

The Notice of Intent describes, “[a]summary of the preliminary needs for change follows. Three overarching needs for change, or principles, emerged throughout the assessment process... These principles will be used to implement the requirements of the 2012 planning rule, which requires that the revised Forest Plan... Furthermore, the 2012 planning rule requires the GMUG, during the Forest Plan revision process....” It is not clear why the described needs for change statement and planning rule descriptions merely reflect current agency philosophies and directives, including a need for flexibility which was a foundational principle in the development of the planning directives.

I do recognize that the descriptions repeat important direction in the Forest Service directives, but fails to include what I believe is the most important element of forest planning which to provide for integrated resource management. The Draft Forest Plan and DEIS should clearly demonstrate integrated resource management programs as required by law, regulation, and policy. I recognize that supplemental information provided with the NOI describes, “Integrate Resource Management for Multiple Uses and Ecosystem Services: (1) The Recreation Opportunity Spectrum (ROS) should be used to better integrate resource management... (2) Direction to maintain soil productivity in the current Forest Plan is focused on timber management... (3) Address areas with high conflict between public recreation/access and private lands. (4) Provide integrated resource direction for designated Colorado Roadless Areas... (5) Direction to integrate timber treatments to achieve multiple objectives....”

The land management plan must form one integrated plan for each unit (16 U.S.C. 1604(f)(1) and 36 CFR 219.10). The plan must provide for ecosystem services and multiple uses, including outdoor recreation, range, timber, watershed, wildlife, and fish, within Forest Service authority and the inherent capability of the plan area as follows: ... (b)... (1) The plan must include plan components, including standards or guidelines, to provide for: (i) sustainable recreation; including recreation settings, opportunities, and access; and scenic character..., and (vi) appropriate management of other designated areas or recommended designated areas in the plan area...(36 CFR 219.10(b)(i)&(vi)). FSH 1909.12 Part 24.43 describes planning steps for National Scenic and Historic Trails. FSM 2353.44b states that a Management Area is to be

established for existing Continental Divide National Scenic Trail (CDNST) rights-of-way corridors. For CDNST sections that pass through the planning unit, plan components must include management and use direction (16 U.S.C. 1244(f)) for the rights-of-way that provide for the nature and purposes of this National Trail (16 U.S.C. 1246). I ask that the revised Forest Plan clearly provide for integrated management of designated areas to protect the purposes and values for which they were established.

For reference and for the planning record, I have attached a CDNST Planning Handbook, which addresses many aspects of planning for this National Scenic Trail. Recommended plan components are found in Chapter III(I); NEPA considerations are addressed in Chapter V; and a glossary provides relevant definitions including recommended Recreation Opportunity Spectrum class descriptions in Chapter VII.

Looking ahead to this summer, please consider hosting a field trip in the Gunnison area to review any proposed revised Forest Plan direction in relation to SBEADMR timber sales and the CDNST management corridor. Possible review sites could include the proposed Sargents Mesa, Divide, or Millswitch Timber Sale areas. This summer would be a good time to reflect on past and current CDNST management practices and to contemplate appropriate forest plan direction for the future. The year 2018 is the 50th Anniversary of the National Trails System Act and the 40th Anniversary of the establishment and designation of the Continental Divide National Scenic Trail.

Thank you for considering these comments and I look forward to participating throughout the revision process.

Greg Warren

Attachments:

- CDNST Planning Handbook (version 04.23.2018)
- CDNST National Trail Management Corridor Map