



Intermountain Forest Association

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May 30, 2018

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

Dear Mr. Armentrout:

On behalf of the members of the Intermountain Forest Association, I appreciate this opportunity to offer comments on the Forest Plan Revision Scoping document for the Grand Mesa, Uncompahgre, and Gunnison National Forest.

Vision

We strongly agree with the outlined vision, especially resilient ecosystems that will sustain balanced multiple-use opportunities far into the future.

Key Needs for Change

- **Strategic, Adaptive Direction:** While we agree with the premise of a plan that is more strategic and adaptive, with the focus on outcomes rather than methods, we recommend that the plan be specific enough to provide long-term guidance to industry.
- **Contribute to Social and Economic Sustainability:** We agree with updating the areas suitable for timber production to better reflect current and potential future opportunities to conduct harvest operations. That being said, we ask that this process be very open and transparent, including providing maps that reflect any additions/subtractions from the current suitable timber base.
- **Provide for Ecological Sustainability:** Please see the comments below regarding other issues/ concerns.
- **Integrate Resource Management for Multiple Uses and Ecosystem Services:** Maintaining soil productivity, regardless of use, is very important. While we agree with having perhaps different direction that reflects an area's use emphasis, we are concerned with the idea of having different standards for a camping area vs. a timber-producing area or a ski area. We recommend working closely with all the stakeholders as this idea develops.

- **Incorporate Best Available Science, Update to Existing Law and Policy:** We strongly agree with using best available science to guide management. That being said, sometimes it can take years for research to be completed and published. We recommend the new plan encourage the use of best available science, but to acknowledge that work needs to continue while research is being completed. Also, any on-going research and results from that research should be transparent and available to the public, especially when that research is being used to guide management decisions.
 - We strongly recommend utilizing the Plan Revision as an opportunity to review the Southern Rockies Lynx Amendment, consider what has been learned since it was signed, and look at updating the lynx direction in the new Forest Plan.
- **Build an Accessible, Useful Plan:** The 2012 Planning Rule requires Plan Components (Desired Conditions, Objectives, Standards, and Guidelines) that can be measured and monitored. When developing plan components, we recommend the following:
 - Ensure Desired Conditions are specific. Avoid using words like “sustainable.”
 - Ensure Objectives are time-specific and measurable. For example, we recommend time frames of “per decade” or “per year.”
 - Although the 2012 Planning Rules allows for optional plan content, including management approaches, it has been our experience that management approaches in new plans have been overused and misused. We recommend minimizing the use of management approaches.
 - Ensure plan components are not duplicative or overlapping. For example, try to avoid having 5-7 plan components tied to snags.

Management Area Framework

- **Natural Process Dominate:** As mentioned previously in our letter dated 01-16-18, 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. For areas where natural processes will dominate and timber harvest is prohibited, we recommend the plan fully outline the risks associated with this type of management prescription.
- **Special Areas and Unique Landscapes:** Similar to our comments above, we feel it is very important that the public understand the implications of choosing to place an area into a specific management area. For some areas, such as Research Natural Areas, it makes sense to limit/prohibit forest management. For others, such as special areas, it may be necessary to actively manage the areas to maintain, restore, and/or protect from catastrophic events. We recommend the plan be as flexible as possible to allow for management if needed.
- **Backcountry, Including Non-Upper Tier Colorado Roadless Areas:** Given the fact that the GMUG serves as critical headwaters, providing 1.9 million acre-feet of water to western Colorado and the Southwestern part of the US, we are very concerned with the idea of limiting management options in management areas outside of the general forest, such as backcountry. This is especially true given the

landscape-level insect mortality that has occurred and continues to expand throughout the GMUG. It may be necessary to treat areas in the backcountry to protect headwaters and other critical infrastructure. We recommend the plan be as flexible as possible to allow management if needed.

- **Recreation Focus Areas/ High-Use Recreation Emphasis:** While we agree that some high-use recreation areas should have limited management, with an emphasis on scenery, we are concerned about this type of prescription being applied broadly across the GMUG. As stated in the document, the GMUG is heavily utilized for recreation and almost every spot within the forest could be tied to a popular recreation spot. In order to maintain balance and actually achieve multiple-use, we recommend not restricting management within recreation focus areas to just those that are visually acceptable. With over 48% of the GMUG as wilderness or Colorado Roadless, there are plenty of places for individuals to recreate and not see active forest management.
- **General Forest/ Active Management:** We agree with the description of the General Forest management area, but would like to see additional language that includes a primary objective of growing commercial timber to support local and regional businesses.

Other Issues/ Concerns

- **Wildfire:** One of the potential Need for Change issues in the Terrestrial Assessment was the need to “consider allowing and providing direction for ecologically sound uses of prescribed fire and wildfire in the plan area,” yet the scoping document does not discuss wildfire but briefly. We recommend including wildfire as a Need for Change issue as the revision process continues. Wildfire can have tremendous effects on watershed health and can also highly impact business operations that rely on long-term supply. Please see our previous comments from our letter dated 12-8-17.

Thank you for your consideration. We would be happy to discuss these comments and recommendations with you at your convenience.

Sincerely,

Molly Pitts

Molly Pitts
Intermountain Forest Association
Colorado Programs Manager