

July 29, 2019

United States Forest Service
Grand Mesa, Uncompahgre, Gunnison National Forests
ATTN: Plan Revision Team
2250 South Main Street
Delta CO 81416

RE: Grand Mesa, Uncompahgre, Gunnison National Forests – Preliminary Draft Revised Land Management Plan

Dear Forest Revision Team;

Thank you for your outreach events and the opportunity to provide comments at this stage of the process. I am taking advantage of this chance and am providing a few comments.

I particularly liked the Forest Plan Vision, Roles, and Contributions introduction since it captured the diversity of the lands and mentioning the importance of both public enjoyment and commodity use and community connections. Excellent!

Socio-economics: I think that it is of particular importance to document the interdependence between counties, and the overlap of land management beyond forest boundaries. Tourism, grazing, oil and gas, mining and timber often has a footprint larger than any one GMUG county and some uses overlap National Forest boundaries.

The timber demand study that was initiated in the 2001 Planning effort and the more recent analysis in the landscape-scale DEIS for the Spruce Beetle Epidemic and Aspen Management Response (SBEADMR) analyzed important forest plan level issues for the GMUG. I hope that this prior work can inform this current work on the forest plan. (SBEADMR DEIS pages 394-493). SBEADMR comments from the timber industry from 2015 highlight this point:

“In summary socio-economics are important considerations for several key reasons:

- to protect the existing jobs and the companies that provide them;
- to help increase economically-sustainably capacity in service work;
- to begin to develop processing capacity in the long-term to use the dead trees that will be falling for the next few decades. (Within stands experiencing epidemic levels of spruce beetles, 1000-hour fuel loadings can be approximately 30 tons/acre. Within 20 years after the beetle epidemic, 1000-hour fuels can increase to 50 tons/acre as dead trees fall, and may not drop below 40 tons/acre for a century (Jenkins et al. 2008) (page 178).”

It's amazing how quickly the new forest insect epidemic dynamics are overlooked. Post-epidemic forests have changes in fuel loadings and management challenges due to hazard trees and downfall that create obstacles and dangers to the recreating public.

New Public Lands Trends and Issues: Other new trends will also be important considerations including planning direction for the ever-increasing recreation industry. High-Use Recreation Areas – MA 4.2 will need special attention. A newly introduced wilderness bill did not seem to take issues related to these areas into account, while Draft Forest Plan direction MA-GDL-HIREC-04 gives careful account of future potential management concepts such as provisions that may be needed to protect infrastructure and to mitigate or prevent possible resource damage.

The Terrestrial Ecosystems section (pages 16-17) and the Fire and Fuels Management section (page 22) and the wildland fire management section (page 23) are also vulnerable to the fragmentation issues. As wildland urban interface- WUI – grows from future population growth will the USFS have enough landscape **strategically** available to meet the management objectives? Tracking wilderness acres, wilderness study acres, roadless acres, Lynx analysis unit acres, etc.

begins to raise the question of meeting all the commodity needs while accommodating all the recreation demands. My hope is that this forest plan will model a path to juggle the many challenges.

On the subject of Timber and Other Forest Products, I note that the guideline FW-GDL-TIMR-09 relies on the Appendix 2 and the Southern Rockies Lynx Amendment Direction. The Record of Decision on this Amendment stated that “The direction given in this decision to promote and facilitate lynx conservation will be reviewed and reconsidered when each Plan is revised, and Plan direction updated as needed to respond to new information and remain consistent with law, regulation and policy.” It has long been the recommendation of the forest management community that you review and reconsider the current lynx population and trend on the GMUG NF. Are there long-term effects on forest health, forest productivity, and long-term quality and quantity of lynx habitat on the GMUG caused by eliminating or curtailing precommercial thinning on the GMUG NF? Research since the March 2000 listing decision by Dr. John Squires, Dr. Jake Ivan, the State of Colorado, and others should be reviewed and incorporated into various alternatives.

As a representative to the Colorado Forest and Water Alliance I have learned about many water source protection issues. I am concerned that the Protection Emphasis Areas, including Wildland Urban Interface (pg 23) is not careful about specifically recognizing the unique importance of the water supply infrastructure. The language to-date mentions 1 mile buffers and deference to WDFSS (page 23) and local CWPP's , BUT there are new efforts underway to recognize 'zones of concern' or watershed risk assessments that will be more specific about risks to water supplies including reservoirs and pipelines. The Front Range water suppliers (Denver Water, Colorado Springs Utilities, etc.) have learned the expensive way that following fires the floods and mud cause catastrophic problems for years after a fire event. Problems like these would be ruinous to small rural water companies and reservoirs.

The Water Quality and Water Resources section devoted to Riparian Management Zones , FW-STND-RMGD-35 as written could be problematic for water suppliers. Whereas mitigation and care is required in any riparian zone, water supply diversion expansions or maintenance shouldn't be precluded or so expensive as to be cost-prohibitive. This would also be an important provision for road construction, timber harvest and even trail maintenance and expansion.

As I have reviewed recent **project** level EIS's, I have found little to no analysis on this water infrastructure topic. Yet per the SBEADMR DEIS (pg 81), “within the GMUG specifically, only 19 of the 231 watersheds in the GMUG do not include municipal supply watersheds.” As drought contingency planning proceeds there is a small but growing local awareness of the risks to water infrastructure in a state that is headwaters for many counties, municipalities, agriculture water suppliers, as well as 19 down-river states. Please consider special attention to this subject which could be a model for other forest revisions in Colorado and the West.

Thank you for your consideration of these comments! If you have any questions, please contact me at the information found on the comment form.

Best Regards,
Nancy Fishering

cc. Montrose County
Delta County
Mesa County