



# Intermountain Forest Association

886 S Charlo Drive Pueblo West, CO 81007

928-521-9476

November 22, 2021

Mr. Chad Stewart  
Forest Supervisor  
GMUG National Forest  
2250 South Main Street  
Delta, CO 81416

Dear Mr. Stewart:

Intermountain Forest Association (IFA) is a member-based organization that advocates for healthy forests and healthy communities, including actively promoting sound forest management that provides a stable and sustainable supply of timber from public and private forestlands. Given that several of IFA's members heavily rely on timber output from the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forest, we feel it is important to provide our comments on the Draft Revised Land Management Plan (Plan) and Draft Environmental Impact Statement (DEIS). Several overarching comments are:

## Public Involvement

The 2012 Planning Rule puts significant emphasis on providing an opportunity for collaborative public involvement during the plan revision process. We agree that the GMUG held a lot of public meetings to inform the public, however, the process fell short in terms of opportunities for meaningful participation. For instance, most of the public meetings were simply a forum for the FS to walk attendees through the information, without an opportunity for meaningful two-way dialogue with the FS or other stakeholders. The process would have been better serviced if area specific workgroups could have been used. Rather than FS specialists and internal staff coming up with Plan Components, it would have been nice to have that conversation include the public. Instead, we were left out until the draft plan was released. Not only would more collaborative involvement with stakeholders have resulted in a better plan, more importantly, it would have given ownership to the participating stakeholders. We see a wealth of expertise and willingness to work with you and your staff to craft an effective forest plan and urge you to take a much more collaborative approach in finalizing the revised Plan than was used to develop the draft revised Plan.

Lastly, regarding public involvement, it is important to note that many of the Citizens Proposals for Special Management Areas with Preservation and/or Recreation emphasis were not developed collaboratively and did not include fair representation of stakeholders. While perhaps not required by law, the lack of inclusiveness demonstrates the unwillingness by some groups to consider the needs of the broader group of forest users.

### Plan Components

Overall, many of the Desired Conditions and Objectives need to be rewritten to meet the definition as defined by the 2012 Planning Rule as they are not specific enough to be measurable and cannot be monitored to determine whether progress is being achieved. Furthermore, some of the individual categories need actual objectives. For example –

- Desired Conditions – most Desired Conditions do not meet the 2012 Rule definition of a Desired Condition because they are not measurable and cannot be monitored to determine whether or not they are being achieved. For example, FS-DC-SCEC-01
- is not measurable, cannot be monitored, and is fairly wide open. We recommend rewriting all Desired Conditions to conform to the definition in the Planning Rule.
- Objectives – the majority of individual categories do not contain any Objectives. Given the lack of specificity in the Desired Conditions and the lack of Objectives, it will be hard to determine progress. We recommend collaboratively developing more Objectives to be included in the plan. (see below for more specific comments).
- Management Approaches – the Plan overuses and missuses Management Approaches. According to FSH 1909.12-22.4, optional plan content, including Management Approaches “must not be labeled or worded in a way that suggests it is a plan component.” The Management Approaches in the Plan do not conform to that direction. We recommend that you review each Management Approach to determine if it is more appropriate as a Plan Component. We also recommend, once the revised Plan is enacted, that Management Approaches not be changed or deleted or added without an opportunity for public review and comment.

### Recommended Alternative

Of the three action Alternatives, we strongly support Alternative C as we feel it is the best alternative in terms of actively managing the forest, protecting local jobs, and ensuring there is a forest in the future. Alternative C has the most flexibility to treat areas when necessary to prevent catastrophic wildfire and insects and disease, while at the same time providing sustained volume to existing mills and treating more acres of hazardous fuels. Alternative C shows the greatest movement toward achieving desired conditions and Alternative C has the greatest economic impact of the three Alternatives, as well as the highest number of associated jobs. Given this, we recommend Alternative C, as modified by the comments below:

- The Annual Projected Timber Sale Quantity (PTSQ) should be higher than the proposed 55,000 ccf. Ideally, we would like to see a PTSQ of 70,000 ccf per year. Furthermore, the Plan should include language that any PTSQ is an average harvest level, not a ceiling or maximum cap.

As written, we do not support Alternative D and feel it will cause irreversible harm if chosen. Alternative D adds a lot of restrictions that make active forest management more difficult to implement and, in some cases, prohibits it altogether. It prohibits salvage, reduces the PTSQ and treats fewer acres of hazardous fuels. This direction, along with the added restrictions, will significantly reduce the ability of the Forest Service to achieve the desired conditions and objectives of the revised plan. For instance, almost every plant/tree species with the GMUG is departed/at risk regarding the distribution of structural stages. Not being able to manage the species across the entire landscape will make it hard to achieve the desired structural stages.

### Monitoring

Given that Plan Components will need to be reworked to meet the requirements of the 2012 Planning Rule, the Monitoring Plan will need to be updated and expanded to meet the requirements of 219.12. We request an opportunity to be involved in the selection of monitoring protocols and the development of Adaptive Management Questions.

Specific comments on the Draft Plan and Draft EIS are below:

### **Draft Plan**

#### Chapter 1

The Plan clearly states that Recreation is the GMUG's number one economic contributor (page 8). We feel this is an unfair statement regarding economic benefits from the GMUG, especially given the details presented in the DEIS. The DEIS states that recreation (under all alternatives) contributes \$14 million in labor income, whereas as timber harvesting and processing activities in Alternatives B and C would contribute between \$18.6 and \$17.7 in labor income. We recommend rewording several of the statements on pages 8-9 of the Plan to better reflect the actual economic contributions. Furthermore, the Plan and the DEIS does a poor job of explaining how recreation and forest management aren't exclusive of one another and at times, makes the reader feel like one is more important than the other. If we don't manage the landscape through active forest management, catastrophic wildfire and insects and disease will change the forest so drastically that recreation will be drastically impacted. The same argument could be made for our communities that rely on forested watersheds and wildlife that need healthy forests to survive. We recommend reworking some of this language to show a more balanced approach.

#### Chapter 2

As mentioned above, many of the Desired Conditions and Objectives need to be rewritten to meet the definition as defined by the 2012 Planning Rule as they are not specific enough to be measurable and cannot be monitored to determine whether progress is being achieved.

#### Social and Economic Environment –

- FW-DC-SCEC-01 – does not meet the definition of Desired Condition and should be rewritten to be concise and measurable.
- We feel there should be an Objective to maintain the harvesting and milling infrastructure at a level necessary to facilitate forest vegetation management.

#### Partnerships and Coordination (PART) –

- FS-DC-PART-01 – does not meet the definition of Desired Condition and should be rewritten to be concise and measurable.

#### Key Ecosystem Characteristics (ECO) –

- FW-DC-ECO-01 – the Desired Conditions for seral and structural stage distribution and fire regime by ecosystem at the Forestwide Scale as displayed in Table 1 have too large of a range and will be difficult to track progress long term. We are also concerned that some of the species are carrying too much density in the late-mid/late seral stage, leaving them vulnerable to future insects and disease epidemics.

#### Invasive Species (IVSP) –

- FW-STND-IVSP-04 – this standard states that all contracts and permits shall include “standard operating procedures,” yet that standard operating procedure is never defined in either the Plan or DEIS. This is especially concerning considering the language in the DEIS (page 400) that states the responsibility for noxious weed inventory, treatment, and monitoring moves to the contractor. While the Standard itself is not problematic (depending on the standard operating procedure), the interpretation (page 400) clearly goes too far. We recommend removal of this standard unless the standard operating procedure is defined and interpretation language in the DEIS is removed.

#### Fire and Fuels Management (FFM) –

We recommend adding Standards along the lines of the following:

- Initial response to unplanned ignitions where suited timberlands are present generally favors full suppression, especially in areas with existing NEPA for vegetation projects.
- Key values within the suited timberlands warrant fire management responses that mitigate the effects or prevent losses from fire. In some situations, resource benefit objectives can be achieved using wildfire, but the use of wildfire is secondary to meeting protection objectives for other values.

#### Timber and Other Forest Products (TMBR) –

- Management Approach – this MA mentions best management practices (BMPs) to maximize carbon storage in silvicultural prescriptions, yet the BMPs are not defined. We feel this Management Approach should be removed unless the BMPs are defined and include the science of carbon storage through wood products.

## Chapter 4

### The Proposed Monitoring Framework –

- The Monitoring Framework fails to provide any specific economic monitoring tied to harvest and milling infrastructure (likely due to lack of specific objectives). Additional language should be added to Table 27 to ask the question “is harvest and milling infrastructure being maintained?”

## Appendix 8: Timber Suitability Analysis

While we recognize that the 2012 Planning Rule only requires a sustained yield limit calculation on all lands that may be suitable for timber production, it is very hard to compare the sustained yield limit as presented with the projected timber sale quantity (Appendix 2) under the different alternatives. The Plan repeatedly discusses the significant tree mortality because of the spruce beetle epidemic but doesn't provide the details of how/why that impacts the projected timber sale quantity. For instance, on page 91 of the DEIS, it states that for spruce-fir and spruce-fir-aspen, the current seral stage distribution was modified to incorporate the latest spruce beetle aerial detection data (1996-2018), with areas impacted by spruce-beetle added to the early seral stage. Given this, the mortality should have already been accounted for in the modeling. Therefore, we believe the 55,000 ccf in Alternative B and C is arbitrarily low and should be higher based on the sustained yield limit.

## **Draft EIS**

## Chapter 2

It would be helpful if the economic information that is scattered throughout the DEIS could be pulled into the Alternative details on pages 16-24.

As mentioned above, any climate change language should include information on locking carbon up through forest products (page 25).

## Chapter 3

Table 30 on page 61 shows the existing condition for early seral stage for spruce-fir and spruce-fir-aspen as being less than 1% with a footnote that the data is pre-epidemic, yet page 91 states the current seral stage distribution was modified to incorporate the latest spruce beetle data. These two statements contradict each other and need to be rectified. The difference between the two has real ramifications (as mentioned above). It also states on page 157 that “through the modeling process, all vegetation stands within the modeled strata were updated forestwide.”

The DEIS fails to disclose how design criteria that is used at the project level can prevent/minimize a lot of the concerns/negative impacts that are associated with certain actions (such as vegetation management). For many of the affected environment discussions, it implies that Alternative D will have less impact simply because less acres are potentially going to be treated. This is an over exaggeration and doesn't give credence to the complexity of these ecosystems. For example, page 107 states that “alternative D may

minimize the spread of invasive species due to its emphasis on management areas.” We recommend including a discussion how design criteria can have the same effect.

The DEIS does not consider some of the written standards into the effects analysis. For example, on page 121 it states “beyond the effects of sediment from vegetation management, fisheries and aquatic species can be impacted by a reduction of streamside vegetation. Some reduction in streamside vegetation can reduce shade and therefore increase average annual and average daily stream temperature..... By alternative, the greatest impacts to aquatic ecosystems from vegetation management under the action alternatives would be under alternatives C and B.” Standards FW-STND-RMGD-08 and FW-STND-RMGD-09 both prevent removing vegetation unless it maintains or restores. This section and others need to be reworked to incorporate the standards and guidelines into the effects analysis.

The DEIS also fails to discuss the other benefits that come from vegetation management projects, such as road maintenance, or the impacts of not doing certain management. For example, page 125 states “the impacts on riparian and wetland ecosystems from timber harvest and vegetation management would vary to some degree based on the acres proposed for harvest between alternatives...Based on proposed harvest acreage and management direction, alternatives C and B would be expected to have the greatest impacts to riparian and wetland areas.” Again, routine maintenance and design criteria can mitigate the impacts from harvesting.

Thank you for your consideration. We would welcome the opportunity to work with you, your staff, and other stakeholders on the details of the draft Plan.

Sincerely,

*Molly Pitts*

Molly Pitts  
Colorado Programs Manager