Attn: Plan Revision Team

2250 South Main Street

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Plan Revision Team,

The Rocky Mountain Biological Laboratory appreciates the opportunity to provide comment on the scoping document. We are supportive of the general direction, and the care and thought that has gone into crafting the document.

Why the GMUG Matters

We appreciate RMBL[rsquo]s inclusion under public enjoyment as one of the unique characteristics of the GMUG. Based upon surveys and anecdotal information, we know that many GMUG visitors enjoy learning more about the ecosystems, as well as the local history. RMBL can provide unique interpretative opportunities that cannot be found in other contexts.

Would it make sense to include the ability of the GMUG to harness, and serve as a role model, for how to create partnerships between the academic research community and land managers in serving science-based decision-making? The wealth of research creates unusual opportunities for improving decision-making, and as one of the larger field stations organized as a nonprofit, RMBL has both the flexibility and capacity to serve as a partner in ways that field stations embedded in other public lands might not.

Need for Change

We recommend that one of the main changes that should be explicitly addressed is the USFS[rsquo]s budget and management capacity. Budget and management capacity has changed considerably since the previous Forest Plan Revision, to no fault of the agencies but because of external factors beyond its control (congressionally mandated budgets, changing use patterns on public lands, economic pressures, forest fire frequency). The ability of the USFS is significantly constrained by the funds that it has available to it, and legal or strategic constraints on where staff time is spent. Budget limitations are explicitly referred to under the second bullet in [ldquo]Contribute to Social and Economic Sustainability[rdquo]. However, we think that these changes have significant impacts on all the issues that the USFS is addressing. Explicitly identifying these realities as a changing circumstance will provide greater transparency into the decisions that the USFS must make and the externally imposed limitations under which the USFS works. We also think that this helps provide a framework for how the USFS moves forward; any strategies should realistically reflect the available budget and time available to the USFS.

Related to fiscal realities, previous high-level USFS strategies have identified private-public partnerships. We think that encouraging partnerships, whether they be with local municipalities, nonprofits, or businesses, will be

critical for effective management of future lands. There are many wonderful examples of such collaborative relationships, but at times these relationships have bloomed in spite of general policy/strategy, not because of it. Given that the USFS is an important decision-maker that must balance many stakeholder interests, it can be a delicate balance to partner with individual stakeholders. But that is why more institutional direction and support is needed to unleash the power of those partnerships without biasing decision-making, or creating the perception of biased decision-making. Given the reality of the federal budget, it is hard to imagine that the GMUG will be successful in the long run without more effectively and creatively unleashing the collaborative energies of local communities. This is not say that the GMUG is not currently effective. Rather, it will need to become more effective at collaboration.

In the section [ldquo]Incorporate Best Available Science[rdquo] we recommend that collaboration be more explicitly identified as a needed change in strategy. As we have previously articulated, the scientific investment at RMBL is quite large relative to the USFS spending on its own research units.

There are several barriers to the effective use of RMBL research by the USFS. First, there is often confusion on both sides of the management and science divide. Managers don[rsquo]t understand how science can be relevant and scientists don[rsquo]t understand what managers need, either in terms of how scientific results are communicated or what research is done. It takes bridge individuals and experience to successfully integrate those communities. Second, there is usually a fundamental misunderstanding about how field science can be used to inform decisions. While fundamental biological processes are often the same across vastly different organisms and ecosystems, there is often an implicit belief that unless the particulars of a system have been studied, relevant scientific information is not available. That implicit assumption often stands in the way of unleashing the full power of what science offers for making management decisions.

The US Park Service provides a positive example of how a federal agency has been able to work more effectively with the research community. This experience demonstrates that while it may not be easy, there are effective and proven strategies.

Management Area Framework

It is unclear how agriculture fits in this framework. Perhaps there are no areas in which agriculture is considered the dominant use, but are there themes in which agriculture is better suited?

While the general direction is that what is appropriate for one area should be appropriate to all areas with the same management theme, it seems that both [ldquo]General Forest/Active Management[rdquo] and

[ldquo]Special Areas and Unique Landscapes[rdquo] by definition will involve specific, place-based direction. If so, it would be useful to explicitly identify that in both of the management themes. If this is not true, it seems that the management themes lose a great deal of their potential power. Consequently we would appreciate clarification as the forest plan revision moves towards classifying specific landscapes. This will help us think about providing feedback at that stage.

Thank you for the opportunity to comment and we are willing to provide additional clarifying information if that would be helpful.

Ian Billick