

Data Submitted (UTC 11): 7/22/2019 6:00:00 AM

First name: John

Last name: Almy

Organization:

Title:

Comments: I have attached a comment file

Priority Watersheds

This is a requirement of the 2012 planning rule.

GMUG has proposed one (Oh-Be-Joyful). But the underlying assessment on how this was determined is lacking or very unclear.

I think the Forest has missed the opportunity to focus resources where efforts will make a difference in achieving desired conditions by not utilizing the concept of priority watersheds more or if you prefer priority landscapes. These areas should be identified through public input and interaction of the Forest leadership team.

How will priority watersheds be used to focus future management/restoration/collaboration/ budget execution? This does not seem to be well addressed or reflected in the plan. If the Forest Plan is intended to be a strategic document then what better approach to use over the anticipated planning cycle than the identification of geographic priority areas based upon a need for change.

I could not find the definition of [ldquo]Priority Watershed[rdquo] in the working draft. Either a standard [ldquo]National [ldquo] definition or one modified for the GMUG Plan revision.

Environmental Flows and Anticipated Water Development.

A difficult issue to be sure. But conflict is inevitable between the demands for water development and the needs it provides for ecological and recreational services. A strategy to address this issue is not apparent in the working draft.

This Forest undertook a major collaborative effort in the not too distance past to address this key issue. It was known as Pathfinder. It was initiated for the purpose of developing a strategic approach that would be incorporated into the revised Forest Plan. Thousands of hours by a diverse group of stakeholders was devoted to this at a cost of upwards of a million dollars. Yet I can find virtually no reference to it in Plan Assessments or the Working Draft. What happen? While it did not solve the challenges of protecting aquatic ecosystem health while still recognizing the expanding need for water supplies I think that there were useful outcomes that would help to focus and prioritize beneficial uses. The Forest Service is not going to be able to avoid conflict and controversy regarding competing water needs so they better have a management strategy in place to guide future decisions.

There is a Plan Component referred to as Management Approaches. This seems like it is the perfect way to address this subject in some detail.

Watershed Condition Assessments and Aquatic Ecological Assessments

The Watershed Condition Framework contained in the Watershed Assessment and the Aquatic Ecosystem Indicator Ratings contained in the Aquatic Ecosystem Assessment seem to be two stand-alone evaluations of watershed and aquatic health. They consider many of the same factors yet their findings are not easily reconciled. What is their relationship and how will they be used together to help determine the future program of

work for the Forest. Based upon what I have read in the comprehensive assessments and the working draft there is no clear disclosure on their relationship. This makes for confusion and a potential for inconsistent outcomes. Even though this may be more of a comment on the comprehensive assessments, it is still relevant since those assessments were foundational to the plan revision. Those assessments were intended to define a need for change and the tools used to determine existing conditions. Therefore if they are ambiguous or inconsistent then that could result in a Plan revision based upon flawed conclusions and assumptions.