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Comments: [External Email]GMUG revision comments w attachments

Thank you to the planning team for a huge endeavor!

Thank you for ALL the efforts applied to the GMUG Forest Plan Revision. Wow, many assessments, science, and data and too much for the general public to digest. What is clear is that the next 10 -20 years will bring new challenges to our forests and it is imperative that we look forward without some outdated pre-existing points of view and preferred prescriptions of the past.

So, I commend the assessments found on pages 9 to 10 on [lsquo]Ecosystem Services and Multiple Uses[rsquo]. This is a section that can lead on future project level activities going forward. Specifically, [ldquo]Management to maintain and improve GMUG ecosystems will ensure continued sustainable uses and intrinsic values into the future[rdquo] (pg. 9), is the true north for the GMUG. Alternative C best meets the challenges to meet this charge.

Some areas of importance to many include:

* Attention and careful management of recreation. Since the GMUG is the 18th most visited forest in the US, we need to take careful steps to follow Recreation Opportunity Settings. We need a balance among the users, the age and economic classes using our forests. The loudest voices always need to be tempered by your assessments in the plan. Promotion ideas by resort areas need to be tempered by capacity just as landscape carrying capacity guides project activities across the multiple use spectrum.
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Protecting and sustaining these (GMUG) watersheds. Our headwaters on the GMUG provide a high-quality, local source of 1.9 million acre-feet of water that is consumed by the population of western Colorado, and downstream users in the southwestern part of the United States. Our watershed also sustains the region[rsquo]s ecosystems and wildlife habitat. The GMUG forests are critical headwaters for both municipal and agricultural water supplies, for both underlying counties and downstream users. Past plans perhaps historically underprioritized the importance of coordinating and consulting with water suppliers to evaluate the relationship between land management projects and emerging risks to our communities.

* Of great concern to me is any large increase in wilderness designations that pre-empt forest wildfire mitigation and/or implementation of landscape scale management tools such as purposely creating catchment areas to contain potential post wildfire debris flows or designing a ridgetop fire break to divert wildfire away from critical infrastructure. Debris flows and ash cause costly damages to water quality that is catastrophically expensive for rural water treatment providers (reference Grizzly Creek fires and Glenwood Springs or the East Troublesome fires and costs as far away as Greeley). Wildfire effects are equally damaging to aquatic species, and CPW can site any number of fish kill sites post wildfire. Wildfire footprints also affect wildlife habitat such as found in the Lynx studies post-fire around Wolf Creek pass. The recent infrastructure bill recognizes this increased wildfire risk in forests with the $3 billion [lsquo]investment[rsquo] in the USFS, and the stated intent to treat 10 million acres for wildfire mitigation in the next five years. Headwater forests should be recognized as being critical to this effort.
* The next 10 years will necessitate project coordination with new partners- and developing outreach to surrounding neighbors to encourage updates to Community Wildfire Protection Plans (CWPP). Many plans written 20 years ago neglected to identify their water supplies as values at risk. The risks have increased drastically due to the current 20+ year drought occurring in the GMUG geographic area. Similarly, the local

Wildfire Decision Support Systems -WFDSS did not identify specific at-risk locations for [lsquo]water use-related structures (dams, reservoirs, ponds, ditches, diversions) (see page 26 & page 51). Relationships with the municipal or agricultural water providers were not common in the past but will be imperative going forward. Wilderness becomes a static solution and an obstacle to the many multiple use priorities documented in this Revision. Wildfire will never respect boundaries, and cross boundary solutions will be essential in the future.
* Both the [ldquo]Fire and Fuels Management[rdquo] section (pages 24-26), the [ldquo]Infrastructure[rdquo] section (pages 50 -52) and the Monitoring Table 24 refer to [lsquo]Watershed conditions and integrity of public water supplies are maintained or improved[rdquo] in priority watersheds and yet very few water providers have identified their most critical system locations which was an oversight in a majority of the CWPPS. See attachment 1: CWPP Implementation direction from the USFS, CSFS, & Rocky Mountain Research Station.
* Many folks are not aware that the GMUG has one of the largest footprints of roadless areas in Colorado national forests, and proportionately in the US at an estimated 1.1 million acres. The GMUG has over 553,000 acres of wilderness and other areas designated as special management areas or future wilderness. The net effect is that half of the GMUG is [lsquo]off-limits[rsquo] or heavily restricted to active management. New wilderness acre designations should meet new criteria that address today[rsquo]s wildfire risk. New assessments must include goals for managing landscapes to achieve resilient forests which provide downstream benefits for agriculture, wildlife and fish, municipal and agriculture water, and the myriad of recreation opportunities. Most wilderness proposals today are based on criteria from laws dating to the 1960[rsquo]s and prior forest plans. They tend to neglect incorporation of the new challenges obvious in the science and assessments from the 2021 Forest Revision, which is further backed up in national research.
* The 2021 Revision is careful to include references to our water supplies and yet clear objectives to focus on this critically important value are not found. It hasn[rsquo]t been identified in past plans, but specificity like addressing [lsquo]Utility Corridors and Communication Sites[rsquo] (page 52) would be a great improvement in a forest plan. I recognize the new roles for water providing entities throughout the west to provide much of the specificity to help the USFS [lsquo]manage toward desired conditions for infrastructure that is resilient to climate change and to reduce the risks and negative impacts of uncharacteristic wildland fire to infrastructure (FW-OJ-FFM-02)[rdquo] page 51.

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Protecting and maintaining The GMUG[rsquo]s grazing program contributes to the economic feasibility of ranching and the socioeconomic sustainability of local communities. The GMUG Revision notes that the GMUG [ldquo]has one of the largest rangeland resource bases (nearly 2.4 million acres) of any national forest in the United States. The grazing program also helps to maintain agricultural open space on private lands pressured by subdivision and development (USDA Forest Service 2006a). The more than 100-year history of livestock grazing by ranching families in the region has contributed to a specialized rural agricultural society with a strong interest in and capacity for public land stewardship.

* Note that Montrose, Delta, and Mesa counties have documented strong ag economies as indicated in the State of Colorado Ag Census numbers. We are a family farm-based economy where land stewardship is strongest since family ownership is often multi-generational, intimate knowledge of the land. The socioeconomics are often not documented but CO is first in the nation in sheep and 5th in cattle production. Montrose, Delta, and Mesa are among the highest producing counties which is part of the socio-economics critical to the GMUG grazing program. Note the connection below between $41 billion of economic output supported by water supplies from forested watersheds.
* Connecting the dots between the GMUG and private land grazing is important to recognize the role of private lands adjacent to public lands that is supportive to the GMUG role in [ldquo]providing functional habitat for large populations of mule deer and Rocky Mountain elk, bighorn sheep, moose, a wide variety of game birds, and multiple trout species[mdash]as well as other nongame wildlife.[rdquo] (Pg. 9) Private landowners contribute greatly to the health of wildlife in these examples of managing adjacent private land for sage grouse, winter range for elk and deer, and downstream gold medal streams.

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The upcoming publication of The Forest Health Study to inform the Colorado Water Plan is clear that our forested watersheds are critical since:

* 80% of Colorado residents rely on forested watershed for municipal water supplies,
* $41 Billion of economic output from agricultural activities are supported by water supplies from forested watersheds,
* $18.8 Billion of economic output is from water-related outdoor recreation, and
* There are many inter-relationships between ag, water and outdoor recreation, and both timbering and grazing are huge components for important Colorado economies.

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One of my highest priorities is maintaining the viability of the timber industry in the State of Colorado. The GMUG accounts for nearly one-fifth of total net timber growth and a quarter of all growth on national forests in Colorado, the GMUG continues to be one of the largest commercial timber-producing national forests in the Rocky Mountain Region.[rdquo] The importance of the forest products sector cannot be overstated. While skeptics reduce this subject to [lsquo]protecting the largest remaining sawmill in Montrose, Colorado[rsquo], the reality is that the timber industry is largely invisible and interconnected between many small businesses, logging companies, and renewable biomass to energy companies throughout the state. Forest management companies provide revenue to reduce costs of forest management while creating products that permanently sequester and store carbon, helping to mitigate risks to watersheds (as discussed above and note the federal Forests to Faucets program), and playing a role in reducing the costs of wildfire risk reduction.

* The increase in suitable acres to 986,500 acres is scientifically and technically sound and important to meet challenges on the landscape. There is emerging public opposition to this change that seems to rely on reactionary language and reasoning dating back to the days of [lsquo]The Timber Wars.[rsquo]
* The lack of clear, specific objectives could put this priority at risk. During project planning many tangential concerns become obstacles to forest management while deeper analysis shows that long established USFS standards and guidelines and timber management contract provisions are significant safeguards.
* The USFS needs an increased suitable acre platform for flexibility to manage the best acres, protect wildfires along the best ridgelines to achieve future healthy, resilient forests.
*
The cap of 55,000 ccf seems constrained considering addressing new challenges presented by unprecedented, uncharacteristic wildland fire risks. Logging is often the cost-effective tool to manage landscape scale risks to infrastructure and water supplies like the role played by forest management companies in removing beetle killed trees in the SBEADMR effort or during the Mountain Pine Beetle epidemic in Northern Colorado.

In conclusion, I am very supportive of the GMUG Forest Plan Revision. I am also attaching a principle statement developed by the Colorado Forest and Water Alliance (COFWA) of which I am a participant (Attachment 2). Those principles are well aligned with my comments and many within this plan. I reiterate that no single use should dominate the GMUG future direction. All the items that I mention are incredibly important to our local communities.

I reiterate the difficulty that NEPA public comment periods pose for the working person, or generalist who simply loves and visits our forests. A draft plan, like many NEPA reports, is beyond their ability to influence. My 40-year career in agriculture and forestry has proven to me that these working folks aren[rsquo]t attending meetings, field trips, zoom calls, etc. Multiple use is their life and important for their future. Many of the GMUG projects today involve adaptive management and have opportunities for focus groups to give a voice to these hard-to-reach constituencies. I applaud that approach.

I lean in support of Alternative C since it best reflects the priorities above. Hopefully, the FEIS can document these interdependencies even better. As the COFWA principle concludes:

[lsquo]As renowned conservationist Aldo Leopold famously said, [ldquo]If the land mechanism as a whole is good, then every part is good[hellip]and to keep every cog and wheel is the first precaution of intelligent tinkering[rdquo]. We would advocate that [ldquo]intelligent tinkering[rdquo], the type necessary to create resilient forests and watersheds requires that we also keep every tool in our land management toolkit. Losing our ability to manage vegetation in ways that reduce wildfire threats and sustain forest health, due to overly limiting policy or legislation, simply is not going to be effective in an era of climate change.[rsquo]

Thank you for the opportunity to comment.

Attachments

Attachment 1: Colorado Forest and Water Alliance [ndash] [ldquo]Water Values and the Wildfire Decision Support System[rdquo]

Front Range Fuels Treatment Partnership [ndash] [ldquo]Critical Community Watershed Protection Plans Implementation Direction[rdquo]

Attachment 2: Colorado Forest and Water Alliance - [ldquo]Climate, Forests, Wildfire, and Water Policy Principles[rdquo]