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OVER-BARS Brand

November 26, 2021

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

Subject: GMUG DEIS Plan Comments

Dear Mr. Stewart and GMUG Planning Team:

Please note my opposition to all the Alternatives presented in the document. Given the choice of the four alternatives presented (A-D) and the “No Action Alternative” please note my support for the no action alternative. In this case, no decision beats a bad decision.

In addition, I support the comments provided on November 24, 2021, by Matt Reed of the High-Country Conservation Alliance. I support the comments, recommendations, and basis for those comments.

In addition, the following points of emphasis are provided:

1. The alternatives provided all result in an increase in timber extraction (from the current plan) and do not provide a credible range of alternatives for consideration and analysis. This lack of reasonable alternatives is inconsistent with the requirements of NEPA. All Alternatives provide for increased timber harvest and fail to consider the socio-economic factors related to conserving, protecting, and recreating in the national forests. Rather than provide alternatives that simply enable a singular priority of increased timber harvest a broader range of alternatives which fully consider the importance of the forest, wildlife, recreation, and water resources should be presented. The document based on the scope of alternatives presented simply lacks credibility.
2. This document is a gross failure in collaboration as evidenced by the June 16, 2021, joint letter of opposition signed by all commissioners of Gunnison, Hinsdale, Ouray, and San Miguel Counties. This level of broad-based opposition represents the voice of the citizens most directly affected by the socio-economic impacts of the proposed plan. The plan has also received significant and broad ranging concerns regarding the lack of alternatives, wildlife considerations, river system impacts, conservation of habitat and uncertainties re the forests ability to restore after increased harvest in current climate scenarios. Like representatives of the counties and their Boards of Commissioners, many of the wildlife, natural resource, and recreation responsible agencies have also submitted comments regarding the narrow focus to enable timber harvest of the alternatives and failure to consider the broader considerations. To receive this level of opposition,

particularly from the Boards of County Commissioners and agencies who are direct stakeholders in the process can be described only as a failure to collaborate, consider input provided throughout the process, and reveals an underlying and singular desired outcome to increase timber harvest without broader considerations as required by NEPA.

3. Rather than proceed with the current decision process that has resulted in detailed review of flawed alternatives as noted, it is recommended that the “no-action alternative” be selected. By selecting this alternative, a renewed effort with fresh project and local field level leadership, free from the prior process and approach, can at some point be relaunched with a more balanced perspective from initial planning and scoping through alternatives development. The current effort (and leadership who have steered this process) are simply beyond trying to salvage. The GMUG long term plan deserves a true collaborative process, one in which collaboration is not self-described as we have heard so frequently from the process managers as occurring, but one in which outcomes are inherently understood and supported by the stakeholders. In a true collaborative process, no one will get everything they prefer, but they will certainly be able to support both the process and ultimately the outcome. In this case both the process that resulted in these alternatives, and the resulting outcome are broadly opposed either in full or significantly by the very stakeholders including most notably the boards of county commissioners, conservation groups, and recreation-based advocates who have been the focus of the “collaboration”.

I urge you to make the bold decision to select the “no action alternative.” This will no doubt be very unsettling to members of your staff yet supported and admired more broadly as true big picture leadership and public service, and sends a strong message regarding your expectations of how broad and complex decisions regarding our forests will be made in the future.

Please contact me at 303-881-1779 if you have any questions.

Sincerely,

F. Dave Zanetell (electronic signature)

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