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Comments: After reviewing the new GMUG Forest Plan, it is clear more attention needs to be paid to wildfire preparation, mitigation, and management. One of the Fires and Fuels Management Desired Conditions (FW-DC-FFM-01) states, "Life, investments, and valuable resources are protected. (Stewart, 2021, p.25)" It is not apparent whether the current plan or any of its alternatives will be able to adequately meet these conditions in the case of a dangerous forest fire, like those we have seen in recent years. Strengthening my concern, the Plan Revision Draft EIS Volume 1 lists, "Role of fire management, including fire suppression, identification of high value resources and wildland-urban interface considerations" under the section for Issues that Did Not Contribute to the Development of Alternatives (Stewart, 2021, p.16). Further, it is noted under the Forest Plan Objectives (FW-OBJ-FFM-02) that, "Many local communities have community wildland fire protection plans that have identified wildland-urban interface utilizing various buffer sizes; collaboration with local stakeholders to refine and utilize an appropriate wildland-urban interface buffer would be considered in the site-specific design and environmental analysis of fuels reduction projects, (Stewart, 2021, p.180)" essentially passing the responsibility on to our local communities.

This strategy may have been effective in a pre-climate disaster era, but now we need direct and intentional action. For example, the Delta County Wildfire Mitigation Plan, which encompasses the city of Delta, Cedaredge, Hotchkiss, Paonia, Crawford and Orchard city, weakly suggests that "a home's roofing material and the quality of the 'defensible space' surrounding it," is enough to be considered a Wildfire Defensible Zone (Delta County)[Delta County. (n.d.). Wildfire mitigation. Wildfire Mitigation | Delta County, CO - Official Website. <https://www.deltacounty.com/723/Wildfire-Mitigation.>]

. Considering the predicted annual increase in temperature from the Western Water Assessment and the Colorado Water Conservation Board, this action is not enough. All the models from this assessment point to a much warmer future, with a predicted statewide annual temperature increase of 2.5-5 degrees Fahrenheit by 2050 (Kennedy, 2014)[Kennedy, C. (2014, August 19). Future temperature and PRECIPITATION change in Colorado: NOAA Climate.gov. Future Temperature and Precipitation Change in Colorado | NOAA Climate.gov. <https://www.climate.gov/news-features/featured-images/future-temperature-and-precipitation-change-colorado.>]

. As Colorado warms, the forests become drier and are more susceptible to uncontrollable mega fires (The Nature Conservancy, 2021)[Colorado forest Fires, climate change and River Health. The Nature Conservancy. (2021, June 18). [https://www.nature.org/en-us/about-us/where-we-work/united-states/colorado/stories-in-colorado/forests-rivers-climate-change/.](https://www.nature.org/en-us/about-us/where-we-work/united-states/colorado/stories-in-colorado/forests-rivers-climate-change/)]

. With the record-breaking fire season the Western United States saw in 2020, this is nothing to take lightly.

An effective Forest Plan must address its vulnerabilities to climate change if we want to see forth a healthy and functioning forest over the next 10 to 20 years. Fire management should be regularly incorporated into the formal decision-making process for forest and project planning (Schultz et al, 2019, p.12). A journal published by the Association for Fire Ecology suggests, "Integrating fire management more directly into forest management planning processes also could serve to decrease the distance between the long-term time horizon of forest planning and the near-term time horizon of fire response. (Schultz et al., 2019, p.13)[Schultz, C. A., Thompson, M. P., & McCaffrey, S. M. (2019). Forest service fire management and the elusiveness of change. Fire Ecology, 15(1). <https://doi.org/10.1186/s42408-019-0028-x>]

In the past year, wildfires have devastated places like Greenville CA, Blue River OR, and Larimer County in Colorado. We should be doing whatever means necessary to brace against these disasters in the Grand Mesa,

Uncompahgre, and Gunnison National Forests.

## RESOURCES

Colorado forest Fires, climate change and River Health. The Nature Conservancy. (2021, June 18). <https://www.nature.org/en-us/about-us/where-we-work/united-states/colorado/stories-in-colorado/forests-rivers-climate-change/>.

Delta County. (n.d.). Wildfire mitigation. Wildfire Mitigation | Delta County, CO - Official Website. <https://www.deltacounty.com/723/Wildfire-Mitigation>.

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Schultz, C. A., Thompson, M. P., & McCaffrey, S. M. (2019). Forest service fire management and the elusiveness of change. *Fire Ecology*, 15(1). <https://doi.org/10.1186/s42408-019-0028-x>