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Comments: To Whom It May Concern:

Recognizing the overall importance of the GMUG NFs Forest Plan and the need to be involved in the process as it is revised, Intermountain Forest Association (IFA) would like to submit the following comments regarding the Working Draft of the Forest Plan. Furthermore, we expect to provide specific comments during the remaining process.

Plan Components

[bull] Desired Conditions [ndash] some of the Desired Conditions do not meet the 2012 Rule definition of a Desired Condition because they are not measurable and cannot be monitored to determine whether or not they are being achieved. For example, FW-DC- AQ-01, [ldquo]The overall quality of the air contributes positively to human and ecosystem health, visibility, multiple uses, and wilderness values[rdquo] is not measurable and cannot be monitored. We recommend rewriting all Desired Conditions to conform to the definition in the Planning Rule.

Fire and Fuels Management (FFM)

[bull] Fire Management Emphasis Areas

o While we support the use of prescribed fire to manage the resources, we are concerned about the potential loss of commercial timber to natural disturbances, especially in areas already covered by existing NEPA (i.e. SBEADMR, Taylor Park, etc.). We recommend adding commercial timber to the list under the Protection Emphasis Areas on page 24.

Native Species Diversity (SPEC)

[bull] Canada Lynx

o In order to understand the impacts of FW-STND-SPEC-52 (VEG S7), we need to understand the current conditions in terms of how many acres within areas identified as suitable for timber production is considered high-quality lynx

habitat? Furthermore, how much occurs on slopes less than 40%? We recommend providing a map that illustrates this standard.

Soil Resources (SOIL)

[bull] Given the advancement of harvesting equipment and the new ability to treat slopes over 40% with mechanized equipment utilizing tethered equipment such as Ponsse, we disagree with FW-GDL-SOIL-04. We recommend rewording the guideline to state, [ldquo]To protect soil quality, ground based equipment for vegetation management should only operate on slopes less than 40 percent, unless utilizing tethered or other high flotation equipment. This is especially important to maximize flexibility as we continue to work in critical watersheds or within WUI.

Timber and Other Forest Products (TMBR)

[bull] Rather than having a restricted number for FW-OBJ-TMBR-01, we request the annual offering of forest products be based on what is sustainable. Given the recent GIS exercise completed by the GMUG, we feel this number should be approximately 76,725 CCF annually, including sawtimber, fuelwood, and other products. This number is greater than what is listed, but is more realistic than the sustained yield limit of 138,688 CCF/year.

Natural Areas with Focused Management (MA 3)

[bull] Colorado Roadless Areas [ndash] MA 3.1 (CRA)

o While the intent of Colorado Roadless is to primarily let natural process dominate, exemptions for forest management do exist. Therefore, we recommend adding language to MA-DC-CRA-01 to state, [ldquo]Natural processes within the context of the range of natural variability (insects, disease, and fire) occur with minimal human intervention, unless management is necessary to protect life and property.[rdquo]

Appendix 8. Timber Suitability Analysis

[bull] Operable Areas During the Planning Period

o Please see note above regarding soil resources. We recommend not removing slopes over 40% as they are now feasible to be treated.

In summary, we appreciate the work and time that you and your staff have put into the plan revision process to date. Forest Plan Revision is a daunting task and we appreciate your continued thoroughness as you work through each step. Thank you for this opportunity to review and comment.

Sincerely,

Molly Pitts