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USDA Forest Service, Rocky Mountain Region

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Lakewood, CO 80401.

Submitted to: http://www.fs.usda.gov/goto/gmug/forestplan_objections

RE: Objection to GMUG National Forests Plan

The Wilderness Society (TWS) respectfully objects to parts of the revised plan for the Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG National Forests Plan). The responsible official for the Plan is GMUG Forest Supervisor Chad Stewart.

The specific parts of the Plan to which TWS objects relate to the following issues: (1) Recommended Wilderness, (2) Old Growth, and (3) Timber Suitability.

1. Recommended Wilderness

The GMUG National Forests Plan fails to adequately recommend areas for wilderness designation that are recommended by the Gunnison Public Lands Initiative (GPLI) and proposed in the resultant discussion draft of the Gunnison Outdoor Resources Protection (GORP) Act, and the community conservation proposal. TWS, as an individual organization, a member of the

GPLI, and as a member of the community conservation coalition, has long commented on recommended wilderness areas throughout the forest planning process.

Regrettably, the Forest Service ignored the community consensus and inappropriately discounted the justifications supporting the wilderness areas and additions recommended by the GPLI. The GMUG Forest Plan wilderness recommendations during this entire planning process also deviate drastically from the 2007 forest plan revision process, which recommended about 125,000 acres. In contrast, the working draft plan released in June 2019 recommended only 22,400 acres , specifically for areas long recommended for wilderness designation by

Senator Michael Bennet in the Colorado Outdoor Recreation and Economy Act (S.1634/H.R.3437), and in previous Congresses as the San Juan Mountains Wilderness Act. In the 2021 draft plan, areas recommended as wilderness increased only slightly to 34,000 acres, roughly equivalent to 2% of the GMUG[rsquo]s wilderness inventory. During a webinar to discuss the draft plan, GMUG Forest Planner Samantha Staley said that new wilderness was [ldquo][hellip]a hard pill to swallow to really take on more in that allocation.[rdquo]1

Now, in the proposed final plan, the Forest Service recommends only 46,200 acres of new wilderness, exclusively limiting recommended wilderness to additions to existing wilderness areas. Alternative D

contemplates 324,000 acres of recommended wilderness, largely drawing from the community conservation proposal and the GPLI, both of which TWS supports. Many of these recommended areas rank high for wilderness character and enjoy strong interest from local community members, yet the Forest Service has neglected to recommend them as wilderness.

The conservation community proposal recommends many areas as wilderness that include both strong local support and exceptional wilderness qualities. Several recommended wilderness areas from the community conservation proposal were found to have high wilderness character, including G20-N Sawtooth at 28,041 acres, G20-E Sylvan Canyon at 6,055 acres (yet only 2,429 acres are recommended in the proposed plan), and G26-W Cataract at 10,405 acres (Table 166. FEIS at 611). These areas, among the many suggested by the community conservation proposal, are worthy of designation as recommended wilderness by the Forest Service.

The Forest Service inappropriately embedded the GPLI proposal in Alternative D, blending it with several other proposals submitted by other non-profits, agencies and community members. Yet, the GPLI is distinctly different from the other proposals. The GPLI proposal was crafted by a stakeholder group tasked with finding consensus recommendations for public lands management in Gunnison County, guided by a neutral facilitator in a public process over several years. These stakeholders represent ranching, water resources, summer motorized use, winter motorized use, conservation, mountain biking, hunting, and angling. Recommended designations only made it into the GPLI proposal with consensus support from the entire working group, and those designations received strong support from elected officials and stakeholders throughout the county.

The GMUG was aware of the GPLI's 2019 revised proposal and included it in Alternative D, yet despite the support from Gunnison County, the GPLI stakeholders, Gov. Jared Polis, Colorado Department of Natural Resources Executive Director Dan Gibbs, local municipalities, business owners, and community members, the GMUG has included in the proposed plan very little of the GPLI[rsquo]s recommendations. Regarding recommended wilderness, the proposed plan includes only 17,961 acres of recommended wilderness and no new standalone wilderness areas. The severe discounting of the GPLI proposal, which goes against the formal wishes of Gunnison County, is incredibly disappointing.

Suggested Improvements:

* The final plan should include as recommended wilderness the areas recommended as wilderness by the GPLI that are included in the resultant GORP Act.
* TWS supports the community conservation coalition request that the final plan should include significantly more recommended wilderness from the community conservation proposal.

This issue was addressed in TWS[rsquo]s prior substantive comments during the GMUG planning process [ndash] specifically, on pages 12-26 of the coalition comments filed on the Draft GMUG Plan by High Country Conservation Advocates et al. on November 24, 2021; on pages 53-54 of coalition comments on the working draft plan filed July 29, 2019; and on pages 12-17 of the coalition scoping comments filed by TWS et al. on June 1, 2018.

2. Old Growth Conservation

The GMUG National Forests Plan fails to adequately provide for the conservation of old growth forests. In fact, the Plan takes a large step backwards from the previous GMUG Plan, as it was amended in 1993. The 1993 Plan provided specific management direction, including standards and guidelines, which was summarized as follows in the 2018 GMUG Plan Assessment (p. 60):

The current GMUG plan promotes retention of old-growth. Current standards and guidelines say that [ldquo]in forested areas of a unit, 5-12% or more will (where biologically feasible) be in an old growth forest classification

and most occur in irregular shaped patches.[rdquo] Plan direction also suggests that these patches of old growth should be no smaller than 30 acres and average 100-200 acres in size each in spruce-fir and mixed conifer vegetation types, with old growth patches in aspen and lodgepole pine areas permitted to be smaller. Areas designated as old growth replacement patches are also discussed.

The 2018 GMUG Assessment further states that other national forest plans in the southern Rockies specifically require retention of old growth forests:

Plans for the broader landscape also promote the retention of a specified amount of late successional and/or old forest/old-growth habitat. For instance, the White River National Forest Plan has late-successional retention amounts of 30% for the spruce-fir type and 10% for Douglas-fir and lodgepole pine types. These amounts apply to individual late- successional assessment areas. Old-growth retention amounts are generally 10%. The San Juan National Forest Plan has desired old growth amounts that differ by vegetation type and range from 5-35% of each type.

In contrast, the 2023 GMUG Forest Plan contains no standards or guidelines (or suitability provisions) requiring old growth conservation. Instead, the Old Forest section of the 2023 Plan consists of one Desired Condition (with an associated Appendix) and two Management Approaches [ndash] none of which prohibit commercial logging of old growth forests.

The one Desired Condition states:

FW-DC-ECO-08: Old forest, as defined and characterized by ecosystem in plan appendix 6, are well-distributed within all forested ecosystems, and occur in amounts and patch sizes needed to support species that depend on old forest characteristics. Old forest contributes to ecosystem integrity, provides habitat for associated species, serves as an important reservoir for carbon, and contributes to overall ecosystem biodiversity.

Natural disturbance processes continue to influence old forest conditions. See plan appendix 6 for old forest characteristics in the GMUG.

The two Management Approaches state:

FW-MA-ECO-08.a: Use available data (remotely sensed products and existing forest inventory) to improve spatial inventory of old forest and potential old forest in the GMUG.

FW-MA-ECO-08.b: On a landscape scale, prioritize retention of old forest characteristics that provide habitat for at-risk species, that has limited access, or is considered to be climate refugia (Resistance).

While these are reasonable provisions, they are only aspirational if they are not supported by standards, guidelines or suitability provisions. As explained in the Introduction to the Plan (p. 3), timber sales or other projects may be considered consistent with a Desired Condition if they [ldquo]do not foreclose the opportunity to maintain or achieve any desired conditions or objectives over the long term.[rdquo] Regarding the two management approaches, the Plan acknowledges that they [ldquo]are not requirements.[rdquo] In contrast, timber sales must comply with standards, must comply with guidelines (or at least be designed in a way that is as effective in achieving the guidelines[rsquo] purpose), and must not occur on lands identified as unsuitable for timber production.

The fact that the GMUG Plan includes a guideline (FW-GDL-ECO-07, p. 32) to retain [ldquo]at least minimum[rdquo] amounts of snags and coarse woody debris does nothing to prevent the agency from cutting down living old growth trees. Likewise, while we do not object to the guideline to retain larger live trees [ldquo]within residual patches[rdquo] as habitat for cavity-nesting species (FS-GDL-SPEC-11, p. 41), this lone,

indirect guideline is clearly inadequate to conserve the GMUG[rsquo]s old growth forests.

Our concerns about the absence of any standards or guidelines for old growth conservation are exacerbated by the GMUG Plan[rsquo]s huge increase in the extent of suitable timber lands. As discussed in Section 3 of our Objection, the Plan would increase the suitable timber lands by 303,000 acres, from 469,000 acres under the previous plan to 772,000 acres [ndash] a whopping 65 percent increase. Presumably, a significant amount of old growth forest that was previously classified as unsuitable and thus off-limits to commercial logging will now become suitable for timber production. The increase in suitable timber lands (and associated potential timber salevolume) plus the reduction in protective management direction appears to add up to a seriousthreat to the GMUG[rsquo]s old growth forests.

We find it difficult to believe the GMUG planners[rsquo] assertion that the elimination of previous standards and guidelines will not negatively affect old growth forests. According to the final EIS (p. 390), [ldquo]While the direction regarding old forest and old forest characteristics is different between the current GMUG plan and the draft revised forest plan, the effect in terms of impact to the timber program will be similar.[rdquo] However, the EIS provides no specific analysis of the impact that increasing the suitable timber base by 65 percent - meaning that additional acreage will be managed for the [ldquo]purposeful growing, tending, harvesting, and regeneration of regulated crops of trees[rdquo] - will have on old growth forests. Absent such an analysis, the EIS does not comply with the National Environmental Policy Act.

The GMUG Forest Plan[rsquo]s discretionary management direction for old growth forests is particularly objectionable in light of President Biden[rsquo]s clear policy direction to conserve mature and old growth forests, as set forth in Executive Order 14072, which was issued on April 22, 2022. As it currently stands, the GMUG plan is a prime example of why the Forest Service needs to adopt regulations that provide clear management requirements to maintain and restore old forests.

Suggested Improvements:

* The Old Growth section of the Plan should include standards and guidelines to maintain existing old growth forests along with adequate amounts and distribution of mature forests as necessary to maintain or restore the ecological integrity of old growth forests into the future.
* Include a standard to require an inventory for old growth and mature forests forest-wide (akin to the existing GMUG plan as amended in 19932), and to inventory for old growth and mature forests at a project scale in advance of any potential timber sale.
* Include an objective to measure progress in achieving the Plan[rsquo]s desired condition for old growth.
* Remove known old-growth forests from the suitable timberlands and provide for the automatic removal of newly-inventoried old-growth forests from the suitable timber base.

This issue was addressed in TWS[rsquo]s prior substantive comments during the GMUG planning process [ndash] specifically, on pages 64-65 of the coalition comments filed on the Draft GMUG Plan by High Country Conservation Advocates et al. on November 24, 2021; and on page 10 of the coalition comments filed on the Working Draft GMUG Plan by High Country Conservation Advocates et al. on July 29, 2019.

3. Timber Suitability

The GMUG National Forests Plan fails to adequately identify lands as unsuitable for timber production. The proposed final plan envisions a massive increase in the amount of the GMUG to be managed for "the purposeful growing, tending, harvesting, and regeneration of regulated crops of trees[rdquo] (36 CFR 219.19). The National Forest Management Act (NFMA) requires the Forest Service to [ldquo]identify lands within the management area which are not suited for timber production, considering physical, economic, and other pertinent factors, to the extent feasible, as determined by the Secretary[rdquo] (16 U. S. C. 1604(k)). Here, the GMUG did not perform an

economic analysis, in direct violation of NFMA. Instead, the GMUG found [ldquo]the potential for changes in markets, mill infrastructure, and timber harvest technology and approaches[rdquo] and stated that [ldquo]future economic feasibility is difficult to predict, and as such, in-depth economic feasibility analysis was not done as part of the timber suitability analysis[rdquo] (FEIS Volume III at 344).

The plan assumes that newfangled technologies may make timber harvest on steep slopes (greater than 40%) economically feasible (Appendix 2, at 2-3), but appears to arbitrarily and capriciously base this assumption on one pilot project near Monarch Pass (see, e.g., FEIS Volume I, Chapter 3, at 566) where the agency is paying a contractor to conduct wildfire mitigation, not for regular commercial timber harvest. To our knowledge, the only economic study of tethered harvester forwarder equipment to log on steep slopes in relatively dry forest types (in eastern Oregon[rsquo]s Fremont-Winema National Forest) found that the tethered equipment was significantly less productive than untethered equipment.3

However, the agency does not need to deem such a vast swath of the forest as suitable timber to carry out wildfire mitigation projects such as the example on Monarch Pass. 36 CFR [sect] 219.11(c) & (d) clearly provide that areas need not be identified in the plan as suitable for timber production in order to carry out timber harvest to achieve wildlife habitat improvement and other multiple use goals: timber harvest may be used "as a tool to assist in achieving or maintaining one or more applicable desired conditions or objectives of the plan in order to protect other multiple-use values" on lands not identified as suitable for timber production. As a result, the plan could achieve the ecological, fire, and many of the economic benefits claimed by the preferred alternative without identifying so many lands as suitable for timber production. The agency states that under the preferred alternative, 14% of areas identified as suitable for timber production are on slopes of 40 percent grade or higher, representing 112,000 acres of the forest (FEIS Volume I at 56 and Volume II at 8-10). We worry, and the agency seems to concur (see ROD at 20), that logging on steep slopes may cause negative impacts to water quality and soil resources.

The agency proposes considerable acreage as suitable for timber production that the GPLI has proposed as wilderness or other special management area (SMA) designation under the GORP Act. Managing these areas as a [ldquo]regulated crop of trees[rdquo] is inconsistent with the broad community support for protecting these areas as wilderness or as SMAs. About 57,000 acres of the proposed suitable timber base in the preferred alternative overlaps with the consensus recommendations of the GPLI.

As discussed in the previous section, the proposed final plan has no standards and guidelines that would prevent the agency from managing old and mature forests in the suitable timberlands essentially as a [ldquo]regulated crop of trees.

Suggested Improvements:

* Remove all areas recommended as wilderness and special management in the GPLI from timber suitability, whether or not they are recommended as wilderness or any kind of special management areas in the final GMUG plan.
* Remove old-growth forests from the suitable timberlands.
* Remove all areas on slopes steeper than 40% from timber suitability.
* An economic analysis of the proposed timber program, as required by NFMA, should be completed before deciding final timber suitability allocations and approving the final plan.

This issue was addressed in TWS[rsquo]s prior substantive comments during the GMUG planning process [ndash] specifically, on pages 50-59 of the coalition comments filed on the Draft GMUG Plan by High Country Conservation Advocates et al. on November 24, 2021, and on pages 47-49 of the coalition comments filed on the Working Draft GMUG Plan by High Country Conservation Advocates et al. on July 29, 2019.

In conclusion, The Wilderness Society objects to the GMUG National Forests Plan because it fails to make adequate wilderness recommendations, it fails to provide standards and

guidelines to conserve old-growth forests, and it fails to adequately identify lands as unsuitable for timber production. We look forward to working with you to address these concerns through the objection resolution process.

Submitted by:

[SIGNATURE]

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