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Submitted by hand at GMUG Delta Office and
electronically to scottwillimas@fs.fed.us & sarmentrout@fs.fed.us

February 19, 2015

Dear Mr. Armentrout,

This letter is in response to the opportunity to comment on the Spruce Beetle Epidemic and Aspen Decline Management Response (SBEADMR) draft EIS that is undergoing another round of public input before the official release. Thank you for the opportunity to comment at this stage of the process, our conversations at the Public Lands Partnership (PLP) working group have been informative occasions to better understand this project and have helped us focus our comments.

First off, we would like to reiterate the concerns that we initially submitted with our scoping comments from August 27, 2014. We know that these are on record and have been taken into account in the draft EIS, however they remain key issues for us regarding this project.

We would also like to indicate our support for the comments that have been provided by Backcountry Hunters and Anglers. Mr. Grother has provided concrete & sensible comments on the draft documents that have been provided, especially in regards to silviculture treatments and wildlife concerns. We also support many of the comments being submitted by Sheep Mountain Alliance, High Country Conservation Advocates, and other conservation organizations.

However, Western Colorado Congress (WCC) has enjoyed a positive collaborative experience with the GMUG Forest Service on the Uncompahgre Plateau (UP) Restoration Project and has 30 years of history engaging with forest health issues on the GMUG. We chose to submit a round of comments informed by that experience. We do this in the hope that the lessons and good practices established on the UP can be meaningfully applied to SBEADMR.

NEPA Compliance

Although the PLP working group has provide a forum where stakeholders have had the opportunity to better understand the stated purpose, goals and objectives of SBEADMR, the issue of SBEADMR's "enhanced NEPA" process is still a concern to us. We support the practice of collaboration, adaptive management, and other innovative management processes. We have seen these tools used well on the UP, and in other collaborative restoration projects across the state.

However, SBEADMR is neither a restoration project, nor a true collaborative in the form of the UP project since the Noticed goals and purposes were decided outside of a stakeholder process. Nor is

SBEADMR a Programmatic EIS, even though the size and scope of the proposal is more appropriate for some sort of forest-wide or landscape-scale area analysis.

From what we can tell, SBEADMR is a hybrid proposal that is precedent setting in its methodology. Given that, it should be held to the highest standards possible. This could be achieved by:

- 1) A clear “road map” for stakeholder collaboration from this point forth, modeled on UP and Colorado Forest Restoration Institute (CFRI) principles & recommendations (see Attachment #1 & #2). This collaborative process should be outlined in terms of process, meeting dates, timelines, feedback opportunities, decision spaces, ground rules and expectations. All of this should be tied to the NEPA document.
- 2) Project-level analysis that provides an opportunity for administrative objection or appeal. This could be built into the adaptive management framework but it needs to have clear NEPA language that assures stakeholders that they will have the ability give input on ways to avoid, reduce and mitigate impacts before site-specific projects are approved.

WCC and the Conservation Center are not organizations that chooses litigation as its primary strategy for addressing concerns, however, projects on our public lands should be held accountable to NEPA. Stakeholders deserve the reassurance that their time and feedback will be meaningfully considered.

Purpose & Need, Goals & Objectives

The stated goals and objectives of SBEADMR are public safety, recovery, and resiliency. As we have stated throughout the working group process, public safety should be the prioritized objective of this project.

We can also support recovery projects if a clear stakeholder process as described above is implemented and if the adaptive management principles as described in the CFRI “Collaborative Implementation of Forest Landscape Restoration” (Cheng, et al 2014) document are upheld. We also stress that recovery treatments should only focus on dead trees, not green trees. The issue of targeting “dying trees” needs to be discussed and defined more clearly before we can support the inclusion of this language in recovery actions.

The objective or resiliency continues to be a debated subject at the working group meetings. If a robust collaborative process is created moving forward, we can continue this discussion as the project unfolds, but as it stands, we question the purpose of this objective. Current and emerging science does not provide enough concrete results as to the effectiveness of management for resiliency purposes in spruce/fir ecosystems. We encourage the FS to prioritize public safety treatments and harvest of dead trees on areas suitable for timber before resiliency treatments.

Given this, any treatments completed through SBEADMR should be used to further our understanding of spruce/fir ecosystems and how they are adapting to a changing climate. We are supportive of the “SBEADMR Research Project” that is being led by Dr. Mike Battaglia and appreciate the FS’s response to the 2014 Science Workshop. This is an opportunity to collect baseline data and establish monitoring

plots that will build the existing science. The Battaglia proposal also has built in field trips and stakeholder meetings to discuss the findings, similar to what we see on the UP.

We understand that this study is taking place outside of the NEPA process and will be used to inform other projects besides SBEADMR. However, we would like to see clear language in the NEPA document that ensures this study is incorporated into the annual implementation of SBEADMR. This can be achieved by formalizing the collaborative process and directly including the Battaglia study within that process, ensuring that up-to-date information will be incorporated into the adaptive management strategy. We would like to see this spelled out in the final decision.

Aspen Treatments

The question of aspen treatments has also been a contested subject within the working group. We can support non-mechanical treatment within aspen stands to establish and recover healthy aspen stands. However, we do not see enough detail in the "Detailed Prescription" in Appendix 3 of the Silviculture Matrix. The GMUG has had the opportunity to learn from aspen treatments in the 1980 & 1990's when thousands of acres of aspen were cut and extensive research was done (Shepperd, Wayne D., "Initial growth, development, and clonal dynamics of regenerated aspen in the Rocky Mountains" (1993)). We do not see this research reflected in the current documents.

For example, wet aspen sites should not be treated because regeneration is generally poor (Johnston, Barry C., "Multiple Factors Affect Aspen Regeneration on the Uncompahgre Plateau, West-Central Colorado" (2001)). We hope that the draft EIS will reflect more of the past research and "lessons learned" from past actions in addition to current science regarding SAD and aspen regeneration. Otherwise it will be difficult to have faith in the adaptive management process.

We also specifically disagree with treating multi-storied aspen stands not exhibiting SAD. Such stands are probably healthy and self-regenerating for the foreseeable future. Many GMUG aspen "determinate" stands have been cycling through decline & regeneration for thousands of years and need no treatment. There are plenty of unhealthy stands that merit attention and expenditure of resources.

We would also like to highlight some of our scoping comments regarding aspen treatments:

- * Prescriptions for treating aspen need to take into account:
- * Protection of regeneration from browsing deer and elk and livestock until sucker dbh is at least 4 cm.
- * Aspen regeneration has been found to be more successful on slopes >10%
- * Avoid treating stands with high water table or with anticipated high water table within 4 years of treatment.
- * Size of cutting unit affects regeneration success.

* Soils: mollic thickness affects regeneration success.

* Success of treatment by fire probably requires ideal atmospheric conditions and moisture content of trees, i.e., near drought conditions

More such detail about aspen treatments within SBEADMR within the draft EIS will be critical to having successful discussions about this subject within the working group and any future collaborative process.

In both cases of aspen & spruce/fir treatments, we agree that the objectives & emphasis on ecosystem sustainability within the 2012 Forest Plan PEIS should drive and inform all levels of SBEADMR. Sheep Mountain Alliance details these objectives in their comments. We would add that the Forest Plan standard for maintaining old growth be applied within SBEADMR as well.

Collaborative Process and Adaptive Management

Our support for treatments outside of “public safety zones” depends on a formalized, collaborative stakeholder process with a clear purpose, timeline, decision space, and feedback mechanism

We support the process that is being used on the UP, with annual Project Implementation Plan meetings and updates combined with field trips throughout the year. These Implementation Plans are available to all interested parties and should include (but not be limited to) location and acreage of the projects, treatment types, and required or desired pre-treatment surveys. These plans would be the framework for ecological and social monitoring activities associated with the annual projects. We would also ask that the FS provide this information in advance (2 weeks) to stakeholders so that we can be more informed at these meetings and prepared to give informed feedback.

Stakeholders should also be directly involved during the front-end analysis and the site selection as well as evaluation and monitoring loops. The monitoring process should be connected to annual stakeholder meetings where the proposed annual monitoring activities and objectives are shared.

However, since SBEADMR is not a CFLRP project, maybe a direct use of collaborative processes on the UP will not be applicable. If the GMUG does not have the capacity to provide a similar collaborative process that is NEPA compliant, a programmatic EIS that discloses landscape-level impacts and prepares NEPA documents for individual projects could be a better tool.

In conclusion, we submit these comments in the hope that a NEPA complaint, clear collaborative “road map” for the remaining design and implementation of SBEADMR can be created. Collaboration depends on building relationships between the stakeholders and the trust that collaborative efforts will have concrete results, otherwise the process defaults to negotiation. We think that despite a rocky beginning and the initial misunderstandings about the collaborative nature of SBEADMR, we can move forward together and not default to the typical tools of NEPA negotiation.

Sincerely,

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Attachment #1

Collaboration in Land and Resource Management: Key concepts and components

Tony Cheng, Colorado Forest Restoration Institute, Colorado State University October 2012

Defining collaboration: When two or more actors voluntarily work together to define and achieve goals that couldn't be achieved by working alone.

- Open, inclusive, and representative participation – key people are involved, no one is excluded, and conscious efforts are made to seek out broad representation of perspectives, interests, and voices.
- Commitment to regular, face-to-face interaction and communication in different settings – meeting rooms, in the field, restaurants & bars. This includes gathering in places that is convenient for all parties.
- Clearly articulated and universally-understood purpose, needs, and goals for the group.
- Clearly defined roles, responsibilities, and authorities of participants – what each participant can and can't commit to on behalf of themselves and their respective organizations or constituents.
- Fostering facilitative leadership – all parties take part in leading and being led
- Co-creating and co-managing the collaborative “space” – all parties take responsibility for developing and maintaining the collaboration. This includes investing in the administrative, organizational, and coordination aspects of collaboration.
- Clearly defined “decision space” – everyone has a clear understanding of what decisions can and cannot be made or influenced.
- Working constructively through disputes and conflicts towards achieving consensus – ideas, initiatives, and proposals are advanced through active listening and inclusive deliberation, moving forward only when there is unanimous support and/or are no outright objections.
- Commitment to co-producing knowledge to arrive at shared understandings about the situation – developing and applying locally relevant, science-informed information.
- Proportional commitment of resources to carry out tasks and actions towards shared goals – shared investment, shared risk, and shared rewards in outcomes.
- Focus on intermediate outcomes and small gains.
- Commitment to learning, evaluating, and changing – putting in place a monitoring strategy to gauge if, how, and why different agreed-upon actions produce what effects and changing course if those effects are not desirable.
- Critical self-reflection – are we achieving what we set out to achieve? How do we need to change?

Attachment #2

From “The Utilization of Collaborative Processes in Forest Planning”

Sam Burns, Research Director Antony S. Cheng, Assistant Professor of Colorado Forest Restoration Institute, December, 2005

Selected from Section IV” Constructing Clear Collaborative Expectations” pg 59:

Many reports are available (including one compiled and edited by Ann Moote and Dennis Becker, “Exploring Barriers to Collaborative Forestry,” report from a workshop held at Hart Prairie, Flagstaff, Arizona, September 17-19, 2003) about the failures of collaboration resulting from mixed or unclear expectations about the process or outcomes. Inconsistent and unrealistic expectations of collaboration, and a lack of criteria for measuring the effectiveness of collaboration, lead to unfair criticism of collaborative efforts, accusations of failure, and both participant and agency burn-out. (Hart Prairie, Barrier One, p. 4. Ecological Restoration Institute, Northern Arizona University) Although many forest planning initiatives begin without a complete “road map,” and are often changed or adapted at times during implementation, one of the most highly recognized success factors is establishing clear outcomes or objectives right at the very beginning. Where are we trying to go? How will community involvement or input be utilized? What is the anticipated time frame for the planning process? What will the forest plan accomplish? What is the role of the community participant? We identified five factors related to clear expectations for collaborative forest planning from our case study:

- 1) Develop and widely distribute a clear “road map” of the process;
- 2) Clearly delineate the “decision space”;
- 3) Define ground rules of engagement;
- 4) Time commitments and schedule of outputs and actions;
- 5) Results of unclear expectations.

Selected from Section VI “Collaborative Structure Design” pgs 76-77

After an internal organizational capacity assessment has been made, a firm decision made to implement a collaborative process and monitor it, and expectations clearly defined, the next most important element is deciding what sort of collaborative community process will be utilized. This involves making choices about a broad range of key elements or orientations in the planning process. The selection of these process components, including which group interaction and facilitation approaches and tools will be used, will significantly affect the character, framework, and length of the entire forest planning process.

We identified 12 attributes of process design for collaborative forest planning from our case study:

- 1) Focus on Desired Future Conditions;
- 2) Place/landscape-based process;
- 3) Topic/issue-based process;
- 4) Structure and organization of group processes;
- 5) Methods for tracking community input and information;
- 6) Role of third-party facilitator;
- 7) Maps as tools to facilitate dialogue and collaborative learning;
- 8) Planning for contingencies;
- 9) Integrating various data;
- 10) Bringing in outside assistance;
- 11) Steering committee and cooperating agency status utilization;
- 12) Heightened communication.

In most applications observed through this research the emphasis in collaboration was on either regional meetings or orientations, but in local communities where USFS Ranger District offices were located, the general lessons learned about engagement and dialogue could also be applied to working with stakeholders and public at a greater geographic distance. Among the cases examined in this research in the Rocky Mountain West, it was pretty much possible for the national forests to focus on a few communities that were closely aligned with their districts, and around which they could focus their collaborative involvement. In other geographic areas, for example the US Forest Service Southern Region where communities are closer together, a strategy for “multiple community engagement” will likely be necessary.

In the national forest cases we examined, there was also an increasing use of websites to archive and share meeting notes, share resource specialists’ assessments, and even provide opportunities for any interested party to participate through comment surveys or by listing a management concern regarding a given ecological theme or landscape. The increased use of appropriate communication technologies may facilitate collaborative involvement among some segments of the public, but will most likely never take the place of face-to-face participation, whenever that is possible.