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February 18, 2015

Dear Mr. Armentrout and Mr. Williams,

Thank you for the opportunity to comment before the SBEADMR EIS is released. We also appreciate the enhanced public process opportunities created by the formation of the SBEADMR working group. The working group has been an informative and much needed forum for regional stakeholders to better understand each other's perspectives on public lands management.

These comments are in addition to our previously submitted comments of August 30, 2013, June 10, 2014 and July 17, 2014.

The breadth of this project makes it very difficult to offer specific comments. While we recognize the lengthy public process for SBEADMR to date, the scope and scale continue to make public input a challenge. It's very nature — a ten-year project without site-specific selection or analysis or opportunities for administrative challenges — gives the project an overall lack of transparency.

We agree with Backcountry Hunter's and Anglers (BHA) comments pointing to a more appropriate process being a forest-wide area analysis followed by several project level NEPA decisions. Project-level NEPA would offer site-specific analysis and official opportunities for public input at that level. The SBEADMR EIS as proposed does not.

We support the idea of further public collaboration, and a complete adaptive management cycle of plan, act, monitor, evaluate and adapt management as appropriate, but as we understand it, public input *might* be considered in this process, but not required. Therefore we continue to question the NEPA and NFMA compliance of SBEADMR.

To fully comply with NEPA and its implementing regulations (40 CFR 1500 et seq.), the agency must disclose all the potential direct, indirect, cumulative, and reasonably foreseeable future impacts. See 40 CFR 1508.8, 1508.25. This could be accomplished by preparing a programmatic

EIS that discloses the landscape-level impacts of SBEADMR. Followed by NEPA documents for individual projects — or groups of them, depending on acreage — to disclose the site-specific impacts.

It is not realistic to disclose all potential site-specific impacts in the EIS now being prepared, which again compromises the legal compliance of this EIS. The Forest Service decision maker(s) and the public deserve a full accounting of the impacts and ways to avoid, reduce, and mitigate them before site-specific projects are approved. Any use of categorical exclusions would violate the public trust, and contradict the “ongoing outreach, public involvement and collaboration with interested groups and individuals” the Forest Service says it continues to engage in for SBEADMR. (Quote is from the GMUG’s January 26, 2015 News Release.)

The EIS and any associated public communications must make clear how the USFS will fully comply with NEPA by disclosing the possible impacts of actions before they are approved and implemented.

While we continue to disagree on the above-mentioned issues with the process, in an effort to guide this process to a more acceptable outcome, we will proceed by commenting directly on the published purpose, need, goals and objectives and basic science and analysis documents posted on the GMUG’s SBEADMR page.

ASSUMPTIONS:

The Proposed Action of the Scoping Notice dated July 29, 2013 states that this project is consistent with the management direction identified in the GMUG Forest Plan (1983 with later amendments). Due to circumstances beyond your control this Forest Plan is woefully outdated. Overall conditions have changed significantly since the plan and subsequent amendments and therefore this project should make every attempt to comply with the intent and objectives of the current Forest Plan Rule finalized in 2012.

The 2012 Forest Plan Programmatic Environmental Impact Statement emphasizes the importance of maintaining biological diversity in plants; restoring riparian habitat; monitoring with an increased role for science; identifying species of conservation concern; reducing roads; establishing best management practices for water quality; maintaining or restoring air and water quality, soils and soil productivity, and water resources; using the best scientific information on where and how climate change will affect ecological conditions; improving outdoor recreation by improving ecosystem services, and emphasizing ecosystem sustainability in timber harvests.

These objectives detailed in the current Forest Plan Rule should drive the purpose and need of this project. They should also be included in any analysis and implementation of SBEADMR.

PURPOSE AND NEED:

From the 11.24.14 Q & A: *As identified in the Notice of Intent, the purpose of the project is to treat affected stands, improve the resiliency of stands at risk of these large-scale epidemics and reduce the safety threats of falling, dead trees and large-scale wildfires.*

Comments: The sole purpose of the project must be to prioritize human safety. The protection of critical infrastructure, communities, and creation of reasonable defensible space for critical infrastructure and communities are the most immediate and broadly supported need and must be considered as such throughout the EIS analysis and implementation of SBEADMR.

As stated at the SBEADMR science symposium, the most recent monitoring of spruce post salvage and natural disturbance indicate salvage treatment reduces the natural regeneration seen without salvage¹. Recent studies indicate that beetle mortality does not increase the risk of fire in spruce-fir dominated landscapes². Most scientists now agree that the major contributing factor to Sudden Aspen Decline is the severe drought conditions during the past decade³. Aspen are moving up in elevation to more suitable habitat and while there may be evidence that clear cutting and fire in some locations helps this process, we should not be attempting to save aspen in lower dryer regions where it has declined significantly, and where habitat may no longer be suitable for aspen. The purpose and need of SBEADMR should not be driven by questionable or outdated science.

We do know that there *is* a need to address public safety through wildfire mitigation near communities and removal of dead trees at risk of falling on people or critical infrastructure.

As stated in the new Forest Plan PEIS “ecosystems with higher ecological integrity are expected to be more resilient and resistant to these stressors, including climate change.” The desired conditions of our forests should be healthy, diverse ecosystems. Natural disturbance with a historic level of frequency, intensity and duration, is the most effective way to achieve this especially in higher elevation spruce-fir forests. Natural disturbance creates more resilient ecosystems than frequent non-natural disturbance⁴. Therefore the purpose should *not* be to actively restore or “bring current and foreseeable conditions closer to desired conditions” through treatment, as stated in the NOI, but rather to address public safety. If we want to encourage resiliency in our forests, we should allow natural processes to determine forest conditions and focus management actions towards ensuring community protection.

The 2011 Western Bark Beetle Strategy, cited in the NOI as the guiding framework of this project, was developed to mainly address the pine-dominated forests like in Colorado’s Front

¹ Spruce Fir Aspen Symposium TAKEAWAYS 26 Aug 2014

² Black et al 2013 - Do bark beetle outbreaks increase wildfire risk (NAJ)

³ 2011. Anderegg et al. The roles of hydraulic and carbon stress in a widespread climate-induced forest die-off

⁴ 2012. Minckley et al. Resilience and regime change in a southern Rocky Mountain ecosystem during the past 17 000 years

Range. This project should not be guided by the Western Bark Beetle Strategy but, instead, by current science specific to the Engelmann spruce, subalpine fir and aspen of the GMUG.

GOALS AND OBJECTIVES:

From the 11.24.14 Q & A: **Public safety** – *Help ensure that people and community infrastructure are both a) protected from the risk of falling trees and b) able to be more safely defended in the event of wildfire. Recovery* – 1) *Salvage dead and dying trees for economic benefit to local communities and to increase cost-effectiveness of all treatments. 2) Re-establish desired forest conditions. Resiliency* – 1) *In threatened spruce-fir, prevent or mitigate future bark beetle outbreaks. 2) In aspen, promote healthy clones.*

Comments:

Again, public safety should be the sole purpose and need of this project. We agree that the objective of public safety would be to ensure that people and infrastructure *critical to communities* are protected from hazard trees and wildfire so that inevitable wildfire can safely burn and risk is minimized for communities and critical infrastructure. Wildfire and natural disturbances including beetle outbreaks in our subalpine forests cannot be prevented and in fact are known to enhance multi-age class and species diversity. The limited federal resources available for and revenues generated from this project should be directed to ensuring public safety.

Recovery should not be the purpose, need or goal of this project. Treatment for public safety will allow for recovery of hazard trees and wildfire mitigation treatment. Noted from M. Kaufmann’s verbal presentation to the SBEADMR working group – seed crop years in spruce-fir and natural regeneration happen at greater rates than pine⁵. Reseeding and tree planting do not need to drive the commercial revenues as they did for the Western Bark Beetle project. Subalpine forests naturally experience prolific regeneration and are already *recovering*.

The cutting of dead hazard trees in areas to address public safety should be an objective. Site prioritization should be based on immediate public safety risks. It is not the USFS’s responsibility to meet needs of a *growing* (emphasis added) forest timber industry, as stated in the NOI. Local timber industry should scale feedstock demand to supply provided by community protection and forest ecological restoration products, not encourage managed disturbances due to demands for feedstock.

We applaud the Montrose mill for making recent adjustments to its plant to accommodate smaller diameter dead trees. With beetle outbreaks expected to continue at some level

⁵ **Engelmann spruce seed production on the Fraser Experimental Forest, Colorado**
Alexander et al 1982

throughout the GMUG and western Colorado, the harvest of dead trees to address public safety should provide the economic stability needed by the local timber industry.

Resiliency should not be a stand-alone purpose of this project, rather an objective of public safety treatment. Merrill Kaufmann in his working group presentation stated, “we should not import the concerns of other forests” into the GMUG. We should not import the need for and treatments of pine, as outlined in the Western Bark Beetle Strategy for the spruce-fir and aspen of the GMUG. There is no ecological justification for treatments in the backcountry and, in fact, mechanical treatment of spruce or salvage following a beetle outbreak can negatively affect resiliency by reducing regeneration⁶. Natural disturbance cycles, specifically beetle infestations, will do more over time to manage age class and species diversity and encourage the development of old growth forests. Beetle outbreaks of the past have encouraged a more rapid growth rate than that of fire due to accelerated sub-canopy regeneration vs. the seedling regeneration following stand-replacing fires typical of spruce-fir⁷.

Wildfire in the Engelmann spruce-subalpine fir of the GMUG is infrequent due to cooler, wetter, higher elevation conditions. Wildfire in these locations cannot be prevented and is not a considerable threat⁸.

Climate Change - The new Forest Plan Rule requires the use of “the best scientific information on where and how climate change would affect ecological conditions”. As noted in the Q&A: *On 16 January 2009, the Washington Office of the USDA Forest Service released guidance to Forest Service units regarding the incorporation of climate change science into project-level NEPA documents (Climate Change Considerations in Project Level NEPA Analysis, USDA 2009), which included the following:*

- 1. Climate change analysis includes the effects of agency action on global climate change and the effects of climate change on a proposed project.*
- 2. The Agency may propose projects to increase the adaptive capacity of ecosystems it manages, mitigate climate change effects on those ecosystems, or to sequester carbon.*
- 3. It is not currently feasible to quantify the indirect effects of individual or multiple projects on global climate change; therefore, determining significant effects of those projects or project alternatives on global climate change cannot be made at any scale.*
- 4. Some project proposals may present choices based on quantifiable differences in carbon storage and GHG emissions between alternatives.*

⁶ Spruce Fir Aspen Symposium TAKEAWAYS 26 Aug 2014

⁷ 1991. Veblen et al. Response of Subalpine Forests to Spruce Beetle Outbreak in CO

⁸ 2013. Sibold. Testimony. Subcommittee on Public Lands and Environmental Regulation on the Healthy Forest Management and...

This project must include an analysis of the carbon sequestration of the GMUG's forest ecosystems, with estimates for areas to be treated for public safety to best avoid large stored carbon loss. General estimates can be made with existing modeling tools.

Climate change projections for the Southwest include more severe precipitation events and frequent drought conditions. Healthy soils must be maintained, restored or improved through the implementation of this project to mitigate flooding and sediment loading of already stressed riparian habitats and to protect the carbon storage function of these systems.

We oppose mechanical treatments including clear cutting, sanitation, live tree cutting and salvage outside critical community public safety zones.

SCOPE & SCALE OF PROJECT:

From Q&A - Across all action alternatives, a maximum of 120,000 acres will be analyzed in the EIS for a) commercial mechanical treatment (60,000 acres) and b) prescribed fire or non-commercial treatment (60,000 acres). These acres represent approximately 4% (2% commercial mechanical and 2% fire or non-commercial) of the total Forest Service land base of the GMUG, and exclude Wilderness, Colorado Roadless, and Special Designated Areas.

Comments: We object to the project being defined by the potential treatment of 120,000 acres or the mechanical treatment of 6,000 acres/year, which seems to be driven by the specific needs of the timber industry. Analysis acreage should be determined by critical public safety needs.

ANALYSIS ACREAGE/Scope of WUI:

Public safety treatments for hazard tree removal should be determined by the height of the tallest tree plus 10% surrounding critical infrastructure and communities. Critical sites are those essential for the health safety and welfare of a community. Wildfire mitigation treatments should be within 40 meters of these sites⁹. The 'Firewise' 40-meter wildfire mitigation zone has been generally accepted by the USFS, CSFS and others and should be applied for SBEADMR. Specific public safety zones include:

- Treatment of critical USFS system, county or state roads linking communities or providing access or egress or providing access to critical infrastructure. Non-essential USFS system roads should not be included.
 - Hazard tree removal should be the height of the tallest tree plus 10%. A 300-foot treatment zone is excessive and creates habitat fragmentation and encourages proliferation of user created travel ways.

⁹ 2000. Cohen. What is the Wildland Fire Threat to Homes?

- WAPA and Tri-State infrastructure has already been addressed by district wide EAs. Why are they being addressed again through SBEADMR?
- Communication, power, water and other utility corridors should have the same treatment zones as essential roads for hazard trees.
- Developed and dispersed recreation sites within the WUI only should include a 40-meter buffer zone for wildfire mitigation.
- Other inventoried infrastructure should be classified by prioritization. Infrastructure critical to community safety, health and welfare should be given highest priority.
- We agree with Backcountry Hunter's and Anglers comments requesting the exclusion of Wildland-Rural and Wildland-Agricultural interface.

Ski Areas: Glading, wildfire mitigation and hazard tree removal in and around ski areas should continue to be authorized under individual Vegetative Management Plans and not SBEADMR. Resource concerns and other mitigations for specific ski areas must continue to be managed in compliance with the NEPA documents and site-specific analysis for each area.

Comments below are in response to the Basic Science and Analysis Assumption documents posted for SBEADMR.

Basic Science and Analysis Assumption: Vegetative and Silviculture

Spruce-fir – Sanitation treatments, especially salvage logging, are highly unlikely to prevent the large-scale beetle outbreaks seen in the GMUG currently¹⁰. If the goal is to re-establish forests already experiencing beetle mortality – allowing natural regeneration in spruce is the proven method to achieve this goal. Recent research demonstrates that spruce-fir regenerates very slowly, if at all, following mechanical treatment¹¹, rendering the outcome the exact opposite of the stated desired future conditions.

In areas identified to treat based on public safety need, silviculture prescriptions must maintain forest cover, species diversity and ecological integrity. A percentage of both standing and down trees, especially large diameter ones, must remain to preserve ecological integrity. Dead trees play an important role in forests, both when standing as snags or on the ground as coarse woody debris¹².

We support up to 40 meters of wildfire mitigation to address public safety and wildland fire use (allowing backcountry wildfires to burn). Natural ignitions should be allowed to burn under safe

¹⁰ 2013. Sibold. Testimony. Subcommittee on Public Lands and Environmental Regulation on the Healthy Forest Management and...

¹¹ Spruce Fir Aspen Symposium TAKEAWAYS 26 Aug 2014

¹² 2014. Knapp et al. Long-term dead wood changes in a Sierra Nevada mixed conifer forest: Habitat and fire hazard implications

conditions, performing their critical ecological forest renewal functions yet not jeopardizing adjacent communities.

Aspen – The goals and objectives for the treatment of aspen in this document and in the EIS analysis must be clarified. If the goal is regeneration of seral and/or non-seral (stable) stands, there should be specific objectives and treatments for each. Aspen stands provide unique wildlife habitat, and any analysis must disclose the impacts and how they might be eliminated, reduced or mitigated. Treatment of aspen should only be conducted in stands showing a strong chance of successful regeneration and in suitable conditions.

We agree with BHA’s comments for Appendix E – Silvicultural-Prescription Matrices.

We again question the treatment for resiliency of spruce-fir as a purpose of this project. Resiliency treatments designed for ponderosa pine forest should not be part of SBEADMR. We only agree to hazard tree and fuels treatments within the public safety zone. The long-term ecological value of an area should not be compromised by the immediate commercial value. There is great value in public safety. We would like to see Appendix E - Silvicultural-Prescription Matrices re-drafted with a focus on public health and safety and goals of preserving biological diversity.

Basic Science and Analysis Assumption: Socioeconomics

The benefits of ecosystem services provided by healthy, regenerating and resilient forests must be considered separately, not within the context of commercial treatment. Clean drinking water is a critical ecosystem service and this analysis must disclose impacts and how they will be eliminated, reduced or mitigated.

Analysis should compare the single benefit to industry for salvage treatment outside the public safety areas vs. the multiple benefits to communities, recreation and industry for treatments focused on public safety. It should also address the benefits of natural disturbances, including fire and beetle epidemics, which are ultimately beneficial forests and therefore to all the users who depend on them.

Economic impacts to recreation and tourism must be considered in the socioeconomic analysis. Broader socioeconomic analysis is needed to address all potential impacts of this proposal.

Basic Science and Analysis Assumption: Hydrology and Soils

With climate change modeling for the Southwest predicting increasing drought conditions and more severe storm events including precipitation and wind¹³, hydrology and soils are critical resources that must be protected and enhanced when possible.

¹³ 2014. <http://www.southwestclimatechange.org/blog/19510>

Treatment for public safety should avoid properly functioning watersheds and improve the conditions of impaired watersheds. Live trees and properly functioning watersheds provide carbon storage, critical functions that should be maintained.

The Battaglia research team should look at impacts to watersheds and study treatments used to improve impaired watersheds – past and as part of SBEADMR, to determine the most effective treatments, as these systems are critical to both communities and healthy ecosystems.

Any temporary roads need for the treatment of public safety should avoid riparian habitat. Obliteration of non-system roads must be included in any timber contracts to improve hydrological and soil function.

Individual tree and small group selection cutting should be used in riparian habitat to keep surface water and soil disturbance to a minimum.

Basic Science and Analysis Assumption: Fuels, fire and air quality

We strongly agree with the acknowledgement and recognition of current science in Guiding Issues and Goals that “lowering the extent and severity of future wildfires is not a goal or driving this project.” There is ongoing public mis-perception that the mortality from insects and disease has created a larger fire risk on public lands than actually exists. As acknowledged by USFS staff and others in the working group, major wildfires are very infrequent in the spruce-fir zone. The USFS should use this project to educate the public and address the known public safety concerns of hazard trees, creating safety for firefighters and ‘Firewise’ wildfire mitigation for critical USFS structures and structures on adjacent private land.

The minimization of carbon release should be a goal of any pile/prescription burning. Tree planting should be used to offset the amount of carbon lost from pile burning. If local smoke regulations are more restrictive than those of CDPHE’s they should be met.

Basic Science and Analysis Assumption: Transportation

The guiding issues and goals listed in this document - public health and safety and maximizing economic value, can work in cooperation, but will at times be in conflict. Public safety should be the purpose and need of this project with economic efficiency being a desired byproduct.

We agree strongly with the policy of no increased road density stated in this document.

If a minimum number of temporary roads are absolutely necessary to address public safety, USFS BMP’s must be analyzed closely and updated to ensure minimum impacts, and more

effective closures. Weeds in areas scheduled for temporary road construction should be eradicated prior to ground disturbance. Monitoring and evaluation of system roads, temporary roads and all areas where ground disturbance occurs must continue for at least two years following treatment in order to ensure reduction or elimination of weeds. Areas thoroughly infested with invasive weeds should be avoided all together.

“Obliteration” of any temporary roads should happen immediately following closure of a treatment area, or if reentry is needed, temporary closure must prevent any public mechanized or motorized traffic. Monitoring of closed temporary roads must be conducted for at least two years to ensure effective closure. Wetlands and riparian habitat should be avoided in any temporary road construction.

Treatment activity and respective contracts should be designed to either use timber or other contractors to initiate much needed “obliteration” closure of non-system roads in the GMUG that have proliferated due to the lack of monitoring and enforcement of closure on past timber projects.

Methods – Analysis Approach – Tree removal for establishing road safety should be limited to the height of the tallest trees plus 10% and *not* a 1-mile buffer necessitating temporary road construction. A preferred alternative with the purpose and need of public safety would eliminate the need for a high percentage of new road analysis, construction, monitoring and closure, and therefore reduce the costs of this project.

This project must also be in compliance with all existing TMP’s and updates that are approved during the implementation of the project.

Basic Science and Analysis Assumption: Wildlife

We agree with BHA’s requests for this analysis including the Guiding Issues and Goals of:

- Maintain and improve elk habitat capability and effectiveness during and after project activities.
- Retain un-roaded habitats within the analysis area as big game security areas.
- Maintain or enhance habitat to support viable populations of Forest Management Indicator Species and those species commonly hunted, trapped, or fished as managed by the Colorado Parks and Wildlife.
- Continue to provide high quality hunting and fishing opportunities on the GMUG.

Additionally, we support inclusion of CPW’s species management goals and objectives and seasonal concentration analysis for big game in analysis and design features.

Seasonal considerations for other management indicator species must be considered, including no activity within ¼ mile of raptor nests during nesting season. Linkage areas for lynx, including Cottonwood Pass, Poncha, Cochetopa Hills/North Pass, Silverton-Lake City, Dallas Divide, Lizard Head Pass, Slumgullion and other linkage between LAU's must be avoided to allow for the critical movement of the species. We agree with the stated intent to follow the SRLA regulations for lynx habitat.

The creation of large openings would create impacts to most wildlife as well as the destruction of existing diversity and must be avoided.

As mentioned earlier, the ecological benefits to wildlife of a variety of dead standing and down trees must be recognized and conserved in treated areas, especially in clumps with live trees to avoid blow down.

Appendix F – Design Features for Particular Implementation Projects

We ask that the GMUG do a thorough analysis of measures in the Watershed Conservation Practices Handbook and the Soils Management Handbook to ensure the inclusion of current science and the results of recent monitoring programs and evaluation in areas biologically similar to those proposed for treatment. From the Final Programmatic EIS for the planning rule "Modified Alternative A requires the Chief of the Forest Service to establish requirements for national Best Management Practices (BMPs) for water and plan components must ensure implementation of these practices." GMUG should conduct their own review of BMP's and include those updates into this project.

Specific design features must be included for a broader selection of wildlife and plant species, including TES and MIS species and any known rare plant species or species of local concern with the goals of maintaining and enhancing populations and preserving biodiversity.

Additional Basic Science and Analysis documents needed:

Climate change should be addressed on its own with the goal of conserving the active carbon sequestration of functioning forests and watersheds.

Recreation should be included in the socioeconomic analysis and considered on its own. Goals should include the preservation or mitigation of impacts to primitive, semi-primitive and quiet use recreation areas. Analysis must ensure compliance with existing TMP's. Analysis should also identify opportunities to obliterate non-system roads.

**Monitoring - Comments directed towards Appendix G – Implementation Monitoring
10/15/14 DRAFT.**

While there is a good amount of research information available to the GMUG from the Rocky Mountain Research Station and CSU among others, the GMUG itself has an admittedly weak history of monitoring. The knowledge gained from the direct monitoring and evaluation of this project and from research conducted, or in the process of being collected on similar landscapes, is critical to the success of this project. Objectives of the monitoring program must be expanded beyond a simple project review as described in Appendix G.

The proposed ten-year timeframe of this project makes the integral incorporation of a monitoring feedback loop crucial. The continuous plan—act—monitor—evaluate adaptive management feedback loop noted by M. Kaufmann should be used placing equal importance on all four parts. Treatment actions should not occur unless there is guaranteed funding for the monitoring and evaluation actions.

Additional recommendations from M. Kaufmann's presentation to the SBEADMR working group include an Ecosystem Needs Analysis, which should be applied during the analysis, site selection, implementation, and review and monitoring of each treatment. Steps include area analysis – reference conditions – existing conditions – coarse filter analysis – fine filter analysis and ecosystem needs and capabilities. The process should be repeated annually with the knowledge gained from the previous process as well as literature review.

We support the Battaglia Monitoring Project and its goal of gaining more understanding of adaptive management strategies for the forest types on the GMUG. Although some research projects may seek longer-term results, there will be immediate knowledge gained and existing research by the entities involved that should be incorporated into the annual implementation of SBEADMR. We would like to see a direct inclusion of information gained from this project in the final decision and incorporated into the feedback loops referred to above.

The public should be directly involved during the front-end analysis and site selection as well as the back end evaluation and monitoring loops. The GMUG should establish multi-party monitoring protocols to enhance transparency, education and community support.

The annual acreage proposed for treatment should be limited by the funds available to conduct a full monitoring program on selected portions of each treatment site. If treatment is conducted in both aspen and spruce or spruce-fir forests, annual monitoring programs must be conducted on each forest type. It is critical to maintain the ecological, economic and social benefits of the sites selected for treatment. Stronger post treatment monitoring will ensure both the mitigation of impacts and help improve subsequent projects.

In closing, it is crucial that this process comply with the NEPA requirements to disclose all the potential direct, indirect, cumulative, and reasonably foreseeable future impacts and include public input at the site specific selection level. We understand the need to create more

efficiency and the desire by selective stakeholders to initiate a multi-year project to address public safety concerns due to high rates of forest mortality. As noted by these comments and our active participation from the start of this project, we are willing to engage in making this a better project IF the process and decision documents comply with NEPA.

We also feel strongly that our comments to date recognize the importance of the ecological benefits of our forests, the economic value they provide and the social needs of the communities and visitors in the GMUG. Without healthy functioning forests, allowed to experience natural disturbance cycles we will not have any of the three. We have identified the public safety zones we feel the vast majority of stakeholders can agree to support cutting and we agree that the timber industry is an appropriate tool. We feel that the industry will derive value from the public safety treatments as outlined. And in fact, feel that the industry should be compensated for treating the public safety zones.

Again, thanks for this opportunity.

Sincerely –

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