Grand Mesa, Uncompahgre and Gunnison National Forests  
Attn: Plan Revision Team  
2250 South Main Street  
Delta, CO  81416

Via e-mail: [gmugforestplan@fs.fed.us](mailto:gmugforestplan@fs.fed.us)

December 7, 2017

Dear GMUG Planning Team,

Please accept the following comments on the draft Timber and Vegetation Management Assessment from the parties listed below.

Sincerely,

Rocky Smith, Forest Management Analyst

1030 Pearl St. #9

Denver, CO 80203

303 839-5900

[2rockwsmith@gmail.com](mailto:2rockwsmith@gmail.com)

Matt Reed, Public Lands Director

High Country Conservation Advocates

PO Box 1066

Crested Butte, CO 81224

(970) 349-7104

[matt@hccacb.org](mailto:matt@hccacb.org)

Alison Gallensky

Rocky Mountain Wild

1536 Wynkoop St., Suite 900

Denver, CO 80303

(303) 546-0214

[Alison@rockymountainwild.org](mailto:Alison@rockymountainwild.org)

John R. Mellgren, Staff Attorney

Western Environmental Law Center

P.O. Box 10947

Eugene, OR 97440

[mellgren@westernlaw.org](mailto:mellgren@westernlaw.org)

(541) 359-0990

Steve Allerton, President

Western Colorado Congress

134 N 6th St

Grand Junction, CO 81501

970-256-7650

[Emily@wccongress.org](mailto:Emily@wccongress.org)

Robyn Cascade & Laurie Shannon, co-leaders

Northern San Juan Broadband (Chapter)

Great Old Broads for Wilderness

c/o PO Box 2924

Durango,CO 81302

[Northernsanjuanbroadband@gmail.com](mailto:Northernsanjuanbroadband@gmail.com)

**COMMENTS ON THE DRAFT TIMBER AND VEGETATION MANAGEMENT ASSESSMENT FOR THE GRAND MESA-UNCOMPAHGRE-GUNNISON NATIONAL FOREST**

Below are our comments on the Draft Timber and Vegetation Management Assessment, hereafter “T-V ASSM”.

I. THE ASSESSMENT MUST CONSIDER THE LARGE ACREAGE OF DEAD SPRUCE IN CALCULATING LANDS SUITABLE FOR TIMBER PRODUCTION, MAXIMUM TIMBER CUT, AND LONG-TERM SUSTAINED YIELD CAPACITY.

In the southern parts of the GMUG National Forest, as well as in some other areas, much or all of the Englemann spruce has been killed by spruce bark beetles. For areas without advanced spruce regeneration, i. e., a viable spruce understory, regeneration is uncertain. Many areas have a subalpine fir understory, but fir has little or no commercial timber value. These areas will likely not come back to spruce in the near future. These and other areas could be planted with spruce, but the success of such planting is not assured because spruce trees do not easily withstand the intense ultraviolet radiation of their high altitude habitat. In any case, only so many acres can be planted due to the expense. Thus even with 100 percent planting success (i. e., all of the planted trees grow and survive indefinitely), some of the areas affected by spruce bark beetle will not be stocked with spruce in the foreseeable future.

The areas without an adequately stocked spruce understory should be considered unsuitable for timber production, because these areas will not produce commercially-sized trees for a century or more. The National Forest Management Act prohibits timber harvesting where there is no assurance of adequate restocking within five years after cutting. See 16 U. S. C. 1604(g)(2)(D)(ii).

Thus for the life of the revised plan, these lands should not be considered in the calculation of what land is suitable for timber production, nor in the determination of the maximum amount of timber that could be cut (projected timber sale quantity and projected wood sale quantity), and the long-term sustained yield. Using these lands in the calculation of suitable lands, maximum cut, and sustained yield could lead to a maximum cut that is too high and could only be achieved by overcutting the lands that are actually suitable for timber production.

The amount of land with no or very few live spruce trees is likely to be considerable. The analysis done for the SBEADMR (Spruce Bark Beetle and Aspen Decline Management Response) showed that 28 to 85 percent of the spruce-fir acreage by geographic area was single-storied. SBEADMR FEIS at 4. This could mean a single-storied spruce stand that is, or soon likely will be, dead. Or it could mean a live overstory dominated by subalpine fir, a species for which there is little or no commercial use.

Given the condition of spruce-fir forests on the GMUG, a considerably lower acreage of these lands should be found suitable than under the current plan.

II. CONSIDER THE WOOD QUALITY OF DEAD SPRUCE ON TIMBER SUITABILITY AND MAXIMUM CUT.

Another consideration for determining the amount of timber that can be cut in the revised plan and EIS alternatives is that a large percentage of the Engelmann spruce on the GMUG will be dead by the time the revised plan is approved. Some of it will have been dead for some time, five years or more. Checks and split will develop, making this timber worthless for commercial products such as dimension lumber.

A study done for the Rio Grande National Forest noted that

Montrose Forest products and Rocky Mtn. Timber Products personnel have both mentioned that beetle kill much older than 5 years may be problematic because lumber recovery is significantly affected by cracks and checks.

Forest Stewardship Concepts, 2015, at 3. T-V ASSM p. 7 also notes the deterioration of wood quality over time.

It is our understanding that Montrose Forest Products, the biggest mill in the GMUG processing area, makes primarily dimension lumber.[[1]](#footnote-1) Spruce trees that have been dead for some time, i. e., more than five years, could probably still be used for house logs, fence posts, poles, and firewood, but demand for these products is likely to be limited. In any case, there is certainly a question on how much timber the GMUG could supply that would be usable by the mills in the processing area. Since the GMUG sells 80 percent of it volume to large entities (T-V ASSM at 8), and “most wood removed from the [GMUG NF] is typically processed at Montrose Forest Products in Montrose, Colorado” (id. at 11), a drop in the timber this mill could use should lead to a significant decrease in the amount of timber offered from the GMUG.

III. DESIGN THE TIMBER PROGRAM TO ENSURE PROTECTION OF LYNX

A need for change with regard to “timber and silviculture plan direction” includes “possible incorporation of Southern Rockies Lynx Amendment (SRLA) direction into the [forest plan] section on limitations on even-aged harvest and opening size”. T-V ASSM at 13; emphasis added. The SRLA direction, or more recent direction based on the best available science, must be included in the plan to ensure lynx (*Lynx canadensis*) are properly protected.[[2]](#footnote-2)

Recent research, though preliminary, clearly indicates that lynx are using stands with substantial spruce beetle-kill. See, e. g., Squires et al, 2017. Thus it will be necessary to update the application of SRLA to the GMUG by limiting vegetation management in areas with beetle kill that are still moderate or higher quality lynx habitat, just as it now is in stands dominated by live trees.

Per the quote above, there is direction to limit even-aged management in SRLA. See Standards Veg S1 and S2, SRLA ROD at Attachment 1-1, 1-2. It will be important to include these, or the equivalent, in the revised plan. But we do not find direction on opening size in SRLA.

The revised plan should not allow the creation of large openings, i. e., larger than 40 acres. Such actions would fragment habitat for lynx and other species. Standing dead trees that were sound when attacked by beetles may remain standing for decades, as has occurred in the Flat Tops area of northwestern Colorado after a large spruce bark beetle outbreak there from 1939-1952. The standing dead trees have ecological value, for wildlife cover and nesting, and future benefit after they fall to the ground.

Creating large openings will not meet any legitimate desired conditions or advance the accomplishment of any reasonable objectives. Therefore, any cutting of standing dead spruce or any other timber type, dead or alive, should not create large openings.

IV. EXCLUDE ROADLESS LANDS FROM THE SUITABLE TIMBER BASE

Under a need for change section, the T-V ASSM states that roadless lands may be “potentially excluded from the suitable timber base”. Id. at 13; emphasis added. We feel strongly that roadless lands must be so excluded. While this is not expressly required by the Colorado Roadless Rule (CRR), the CRR is intended to protect roadless areas[[3]](#footnote-3), and in this regard, it is clear that timber cutting is to be the exception, not the norm. See 36 CFR 294.42. Logging is allowed, but only under several exceptions to the general prohibition on cutting, sale, and removal of trees from roadless areas.

If any roadless lands were suitable for timber production, it would encourage managers to allow them to be logged sometime during the life of the soon to be revised plan. But it is unlikely that any commercial logging could occur there without considerable damage to roadless areas characteristics. This would clearly violate the intent, if not the letter, of the CRR.

All roadless lands must be unsuitable for timber production in the revised plan.

V. AREAS WITH STEEP SLOPES SHOULD BE UNSUITABLE FOR TIMBER PRODUCTION

The T-V ASSM contemplates allowing logging on steep slopes, specifically: “areas with more than 40 percent slopes where skyline logging could now be an option”. Id. at 13. This should not be allowed.

There has been only limited use of skyline and other cable logging systems in Colorado over the last few decades. The equipment is expensive and can only be used by well-trained and experienced operators. It could only be used by companies who are assured of the availability of a high volume of timber, so they would be able to obtain good returns on the initial high dollar investment. Such industrial style logging is not appropriate for the GMUG, where wildlife, recreation, watershed, and scenic values are very important, and considerably more important overall than the value of timber.

Areas with steep slopes, high mass movement potential, or a high potential for erosion must be excluded from the suitable timber base.

VI. DO NOT PROMOTE LOGGING TO INCREASE EARLY SERAL STAGES

The T-V ASSM states that vegetation management could “shift the species composition from late seral communities to early seral conditions by creating openings and gaps”. T-V ASSM at 15. At least three age classes are desired for Engelmann spruce-subalpine fir. Id. at 8.

This should not be attempted on a large scale. Fire could be used for this purpose in lower elevation timber types such as ponderosa pine, but it would be too difficult to control, and therefore too dangerous, to use in lodgepole pine and spruce fir. Thus a major effort to increase early seral stages would require large-scale logging and an increased road system for access. When left alone, three or more age classes often develop naturally in spruce-fir stands over time.

Also, to create and maintain a more even age-class distribution, logging would have to be done regularly on all the acres where a change to more early seral classes was desired. Any early seral stands created by treatment or natural events will not stay that way, and adjacent areas would have to be logged as the treated or otherwise affected areas grew into the later seral stages. There would be considerably adverse impacts from widespread application of such treatments.

This kind of action would be especially inappropriate in the higher elevation timber types, such as lodgepole pine and Englemann spruce-subalpine fir, where disturbances such as fire, though often of high intensity, are rare. Fire suppression has had minimal effect on these timber types.

According to the T-V ASSM, 333,321 acres have been cut on the GMUG NF since about 1880, about ¾ of this since 1950. Of this acreage, 137,949 acres have been treated by even-aged methods, about 90 percent since 1950. Id. at Table 2, p. 6. These treatments should have changed the age-class distribution considerably. The current spruce bark beetle outbreak will change many of the acres of the spruce-fir type to an early seral condition. Thus there is no need for actions to change the age class distribution in the higher elevation types. Any such efforts should be limited to the ponderosa pine/Douglas-fir and warm-dry mixed conifer types where it can be demonstrated that fire suppression has moved the age-class distribution outside the range of natural variability.

VII. RETAIN MINIMUM FOREST-WIDE STOCKING AND UTILIZATION STANDARDS, AND CRITERIA FOR WHEN AN OPENING IS NO LONGER AN OPENING.

The GMUG believes that some current plan components are too prescriptive, i. e., that they are not sufficiently flexible. T-V ASSM at 2, 17, 18. However, it would not be appropriate to always leave determination of these standards or criteria to the project level, as the results might be very inconsistent, with possible adverse impacts to wildlife habitat, scenery, etc. Therefore, forest-wide minimums or ranges for these components are still needed.

The current plan’s stocking standards could probably be simplified and still ensure adequate restocking. However, we do not believe they should be reduced much. They are currently as low as 150 seedlings per acre. Current Plan at III-47, -48. If evenly spaced, that means trees would be approximately 17 feet apart. That is fairly sparse stocking already, especially for high productivity sites which would usually reforest naturally to a higher density.

Similarly, the current plan’s requirement for at least 150 trees per acre (300 for aspen) “before a cut-over area is no longer considered an opening” (Plan at III-44, -49) should not be reduced. Applying a lower number of trees for this would make areas still look cut-over because the remains of logging, such as slash piles and other debris might still be visible.

We do not see how the current utilization standards (i. e., the minimum sizes of trees to be cut for certain products – current plan at III-41) are overly prescriptive. They state minimum numbers for log length, diameter and top diameter, and defect. The numbers can be adjusted if necessary, but there still needs to be some standards for what size and quality of logs will be offered for which timber products.

VII. MISCELLANEOUS

On p. 4 of the T-V ASSM, it states that the spruce bark beetle also affects lodgepole pine. What is the basis for this statement? SBB can attack and kill lodgepole pine, but the pitch is toxic to SBB, so the insect will not produce brood and will die. Has there been a significant acreage of lodgepole affected by SBB? If so, this should be described in more detail in the assessment.

REFERENCES

Forest Stewardship Concepts, Ltd. November 11, 2015. Spruce Sawlog Quality Changes Due To Spruce Bark Beetle Mortality, Rio Grande National Forest, November 11, 2015.

Squires, John R., Joseph Holbrook, Lucretia Olson, Jake Ivan, Rick Lawrence, and Randy Ghormley, 2017. Response of Canada Lynx and Snowshoe Hares to Spruce-Beetle Tree Mortality and Wildfire in Spruce-fir Forests of Southern Colorado – Progress Report 2016. June 2, 2017.

1. A website describing the products of this mill states:

   Its services include precision trim, specified lengths, double-end trim, kiln drying, custom drying, special packaging and protective wrapping. Among the wood products Intermountain Resources markets are studs, timbers and various shop grades cuts.

   See: https://www.yellowpages.com/montrose-co/mip/montrose-forest-products-475168852 [↑](#footnote-ref-1)
2. SRLA is said to have been assembled using the “best scientific information available”. SRLA Record of Decision at 27. The current Planning Rule requires the Forest Service to demonstrate that it is using the best available science. 36 CFR 219.3. [↑](#footnote-ref-2)
3. The CRR states, in section 294.40, **Purpose**:

   …The intent of this regulation is to protect roadless values by restricting tree cutting, sale, and removal; road construction and reconstruction; and linear construction zones within Colorado Roadless Areas (CRAs), with narrowly focused exceptions. Activities must be designed to conserve the roadless area characteristics listed in § 294.41,… [↑](#footnote-ref-3)