

# Montrose Forest Products, LLC

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December 7, 2017

Mr. Scott Armentrout  
GMUG NFs  
2250 Highway 50  
Delta, CO 81416

Dear Mr. Armentrout:

Montrose Forest Products, LLC has been very involved with forest management projects on the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forests, including SBEADMR and others and will continue to heavily rely on timber output from the GMUG NFs into the future. Recognizing the overall importance of the GMUG NFs Forest Plan and the continued need to be involved in the process as it is revised, Montrose Forest Products would like to submit the following comments regarding the draft Assessments and the potential Need for Change issues identified in the Assessments:

### Recommendation 1, Desired Conditions

Forest plan direction in the current GMUG NFs Forest Plan relies primarily on Standards and Guidelines, with very little emphasis on Desired Conditions. We support the 2012 Rule's emphasis on Desired Conditions and Objectives, and urge you to maximize the use of Desired Conditions and Objectives.

### Recommendation 2, Climate Change

We agree that climate change should be discussed as part of the forest plan revision. However, there is simply too much uncertainty to use Table 13 (Integrity and System Drivers and Stressors, p 37) or any of the three potential climate change scenarios discussed in Appendix G as a basis for forest plan strategies. We recommend that you prioritize forest resiliency by managing for diversity of species, age classes, and structural stages, by salvaging and removing dead timber, and by reducing fuel loads through mechanical treatments and prescribed burning.

### Recommendation 3, Wildfire

The Potential Need for Changes in the Terrestrial Assessment identifies a need to "consider allowing and providing direction for ecologically sound uses of prescribed fire and wildfire in the plan area." We agree that it would be appropriate to consider direction for the use of prescribed fire and wildfire in the Revised Plan. We recommend the following concepts as components of that direction:

- On suited timberlands, the primary objective for response to unplanned ignitions will be protection of timber resources and management investments. Initial attack will be aggressive and designed to keep fires as small as possible.
- Outside of suited timberlands, strategies and tactics for responding to unplanned ignitions will include minimizing the potential for fires to burn onto suited timberlands.

#### **Recommendation 4, Lynx**

In general, the 2012 Planning Rule requires the forest plan to provide the ecological conditions necessary to contribute to the recovery of federally listed threatened and endangered species. We are particularly concerned about the Canada lynx and the direction in the Southern Rockies Lynx Amendment (SRLA), and include by reference our December 8<sup>th</sup>, 2017 letter. Per the discussion on page 13 of the Multiple Uses Assessment regarding “possible incorporation of the SRLA” into the forest plan, we refer you to the SRLA Record of Decision, which requires the Forest Service to review and reconsider the direction in the SRLA when the forest plans for each of the affected national forests is revised. We recommend that you view the revision of the GMUG NFs forest plan as an opportunity to consider what has been learned since the SRLA was approved, and using that information, include an update to the SRLA direction in the GMUG NFs forest plan as part of the Need for Change. This is particularly important in light of the nearly 300,000 acres of lodgepole pine on the GMUG NFs and the need for precommercial thinning when managing lodgepole pine stands to consistently grown to sawtimber size.

#### **Assessment: Terrestrial Ecosystems**

When considering desired conditions for late-successional and/or old growth forests, we recommend that any management strategies prioritize late-successional and/or old growth on non-suited timberlands.

#### **Assessment: Aquatic and Riparian Ecosystems**

In comparing the Drivers and Stressors discussion about Wildfire (p 20) and the Management Influences discussion about Forest Vegetation Management (p 24), the discussion is biased in favor of Wildfire and against Forest Vegetation Management. We acknowledge that forest management and roads can have significant impacts on aquatic and riparian systems, and cause sedimentation, as stated on p 24. IFA and our members support Water Quality Best Management Practices and we spend considerable resources training on-the-ground operators about State BMPs each year, and we participate in BMP audits through the CSFS in the interest of continual improvement. We recommend that you acknowledge the success of Silvicultural BMPs in Colorado and on the GMUG NFs, instead of simply stating, “undesirable side effects of vegetation management can be mitigated or avoided.”

In contrast to the negative discussion about sedimentation resulting from Forest Vegetation Management, the discussion on Wildfire includes, “it is generally thought that the long-term impacts of disturbances associated with fire-related flooding,

sedimentation, and large wood input are important to ecosystem integrity of aquatic ecosystems.” Frankly, we don’t see much basis for a distinction between various causes of sedimentation, and we generally view sediment from any source as having more negative impacts than positive effects. We also question whether “post-fire recovery is relatively fast” considering the numerous Colorado examples to the contrary. Finally, in reference to changes in runoff and water yield persisting from 20 to 60 years, we recommend comparing those changes to the NRV and not just current vegetative or streamflow conditions.

We concur with your intent to reconsider the standards that require maintaining habitat capability at 40% of potential capability, and maintaining all riparian ecosystems in at least “upper-mid-seral successional stage.”

We recommend that you include the following references:

- Colorado State University Water Center. Colorado Water. March/April 2017, “Forestry and Water. Specifically, we recommend the discussion about stream water quality concerns lingering long after the smoke has cleared.
- Troendle, Charles et al. The Coon Creek Water Yield Augmentation Project. Forest Ecology and Management 143(2001). Specifically, we recommend the discussion about “minimal, if any, increase in sediment transport concentrations” associated with road construction and timber harvest.

#### **Assessment: Watersheds, Water, and Soil Resources**

In terms of Need for Change (p 27), we recommend the GMUG consider, without necessarily incorporating word for word, the direction from the Watershed Conservation Practices Handbook.

#### **Assessment: Benefits to People: Assessing Multiple-Uses, Ecosystem Services, and the Socio-Economic Environments**

Per the discussion (p 25) regarding utilized capacity of dependent forest products companies, we note that the reason most forest products companies have unutilized capacity is due to diminished timber outputs from the national forests, and that the recent increasing trends in GMUG timber outputs will allow those companies to more fully utilize that capacity. We recommend the GMUG NF not consider the cited unutilized capacity as permanent. We also recommend the GMUG NF not get bogged down in the various challenges of diminished workforce or contractor capacities, and assume the forest products companies will be able to work through those issues if adequate supplies of timber outputs are available from national forests.

In terms of Need for Change, we recommend the use of robust Objectives for outputs that directly contribute to social and economic sustainability and ecosystem services.

#### **Assessment: Timber and Vegetation Management**

We appreciate that Table 1 (p 5) was included showcasing standing volume by species. Chapter 13.33 of FSH 1909.12 also identifies age classes, growth, and mortality as information that should be identified and evaluated in Assessments. We recommend that that information be compiled from the FIA inventory information for use in the development and review of the draft forest plan.

We strongly support the GMUGs expectation (p 9) to continually offer timber sales that align with the goal of recovery until the wood is either no longer merchantable or accessible. We recommend however, against tying “sustainability” to salvage of dead trees, which by definition, cannot be sustainable. Please see our comments under the Benefits to People Assessment.

Per the discussion (p 17) regarding Canada lynx being a “species that prefer(s) late-successional forests,” we refer you to the 2013 Lynx Conservation Assessment and Strategy Conservation Measure #1 (p 90), i.e., “Provide a mosaic that includes dense early-successional coniferous and mixed-coniferous-deciduous stands, along with a component of mature multi-story coniferous stands.” Referring to lynx as a late-successional species misses the complexity of lynx habitat needs and the complexity of providing long-term habitat, and we recommend you correct that reference.

We concur with re-examining lands that occur on greater than 40% slopes, yet are productive, and have minimal ecological constraints for potential inclusion into the suitable timber base. Given the rapid change in available technology and equipment, we recommend you don't specify a specific harvesting system (such as skyline), but rather allow for such harvesting with appropriate equipment.

#### **Assessment: Recreation**

If the GMUG considers designating management and/or geographic areas that emphasize recreation (p 4), we recommend that forest management not be precluded if those areas are part of the suited timber base.

#### **Assessment: Scenic Character**

In the forest plan revision process, we recommend the following be considered:

- In the discussion of key issues on pgs. 1-2, we recommend that you modify bullet #4. Specifically, we recommend that you acknowledge that large scale landscape disturbances, whether the current spruce beetle epidemic, or other insect epidemics, fires, windstorms, etc., will all affect how the Forest appears, regardless whether they are judged to be within or outside of their NRV. We also recommend that you clarify what you mean about how large landscape disturbances “have the potential to affect the sustainability of scenic resources and public expectations for natural appearing scenery.” We do not agree with your premise that large landscape disturbances “within the NRV” will not affect scenic resources.

- Per the first bullet on p 2, we agree that management activities will also affect how the Forest appears. Regardless of which process the Forest Service uses to assess scenic resources, we recommend that you analyze and discuss the trade-offs between vegetation management objectives and objectives for how the Forest appears.

According to page 32 and Table 11 of the draft Terrestrial Ecosystems Assessment, the best available information shows that early seral stages are under-represented and mid-seral stages are over-represented in almost all ecosystems. In designing Desired Conditions and Objectives and strategies to achieve those Desired Conditions, we recommend considering adjustments to the Scenery Management System for the GMUG be allowed. We also recommend that language that states Scenic Integrity Objectives are objectives, not hard-and-fast constraints on vegetation management with no flexibility.

- For example, two weeks ago, the Shoshone NF released the Draft Budworm Response Project EA for public review and comment. As part of that proposed project, the SHNF is proposing to amend the forest plan to allow salvage of trees killed by spruce budworm because visual quality standards in the SHNF forest plan do not allow salvage of dead trees. Considering the repeated discussion in the various Assessments about the vulnerability of the GMUG NFs to large scale disturbances, we urge you to also recognize the potential need to respond to natural disturbances and ensure that Plan Components in the revised forest plan allows for responses without a forest plan amendment.
- Forest management and fuels management can both reduce the long-term potential for insect epidemics and catastrophic fires. As you develop Plan Components, we recommend considering the short-term effects of forest and fuels management against the long-term benefits of a reduced potential for insect epidemics and catastrophic fires, including the potential effects on scenic resources.

#### Assessment: Infrastructure

The GMUG has a \$49 million road maintenance backlog (p 11). We agree on the need to maintain and manage road infrastructure to prevent sedimentation and damage to aquatic resources. We recommend that, as part of the plan revision, you look at how forest management projects (timber sales and/or stewardship contracts), can contribute to address road maintenance needs, either through purchaser/contractor work or through KV collections.

Page 5 discusses the decommissioning requirement for temporary roads. We recommend that you keep in mind that decommissioning includes a range of choices (from simply ripping and reseeding the road bed, to fully recontouring hillslopes) ([https://www.fs.fed.us/rm/pubs\\_other/rmrs\\_2004\\_switalski\\_t001.pdf](https://www.fs.fed.us/rm/pubs_other/rmrs_2004_switalski_t001.pdf)) and we recommend a bias toward the choices with the least expense and disturbance.

We support specific Objectives for annual road maintenance and reconstruction.

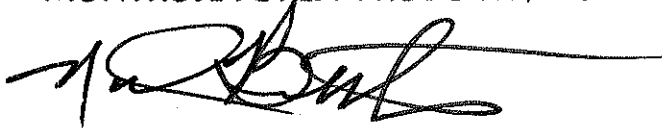
Assessment: Designated Areas

In terms of "additional roadless lands" (p 2), we recommend no further review or analysis of any additional "roadless" lands on the GMUG NF.

In response to the discussion on page 11 regarding the CDNST, see our attached November 10, 2017 letter to Regional Foresters regarding the Continental Divide National Scenic Trail and their September 8, 2016 letter and Recommended Forest Plan Components regarding the trail. We recommend that you consider the full intent of the authorizing legislation and the flexibility in the Comprehensive Plan and develop Plan Components accordingly.

We appreciate your consideration of these comments and suggestions as you move forward with the revision process. I would be happy to discuss these comments if you have any questions.

Sincerely,  
MONTROSE FOREST PRODUCTS, LLC

A handwritten signature in black ink, appearing to read "Normand Birtcher", with a long horizontal line extending to the right.

Normand Birtcher  
Resource Forester