



Montrose Forest Products, LLC

P.O. Box 1149, Montrose, CO 81402 T: (970) 249-0812

September 5, 2018

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 Revised Evaluation Criteria as well as the Draft Wilderness Evaluation Report being used as part of the Wilderness Recommendation Process. Furthermore, we expect to provide specific comments during the remaining process.

With regards to the Revised Evaluation Criteria, Criterion 1 - Question 1a, we are concerned that "what animal species can be found in the polygon" has been added as an Evaluation Considerations. We are also concerned that Criterion 4 – Question 4a, is being populated using the Colorado Natural Heritage Program plant and animal ranking and Potential Conservation Areas with biological significance ranking. For instance, in reviewing the literature for Species of Conservation Concern, there was a not only a wide range in what is considered rare, but what is considered imperiled. We recommend providing additional literature that can be publicly reviewed and commented upon before using any of the species as part of the evaluation criteria.

Lastly, we are concerned that the Evaluation Considerations for Criterion 4 – Question 4, was strictly developed internally and is based upon a Priority Heritage Assets eligibility report that was never finalized. Prior to this being included, we recommend that the draft Priority Heritage Assets eligibility report be available for public review and comment.

After reviewing the Draft Wilderness Evaluation Report, we are very concerned that the draft report fails to discuss some of the complexities and cons of putting more lands into wilderness status, especially with regards to manageability. For instance, the issue of

potential wildfires and the limitations of fire suppression on lands managed as wilderness is never discussed. This is especially concerning on proposed polygons located next to communities and existing infrastructure and the fact that 48% of the GMUG is either already wilderness, or Colorado Roadless. We recommend including language either at the beginning of the document or in each area discussion that explains the potential ramifications of including those acres as wilderness with regards to wildfires, suppression tactics, and fire rehabilitation (including post-fire flooding).

Additionally, we are concerned that the draft report fails to discuss the management flexibility difference between acres designated as Colorado Roadless and those designated as wilderness. For instance, some Colorado Roadless allows for: (1) reducing the risk of wildfire to communities and municipal water supply systems and (2) permitting construction and maintenance of water conveyance structures. Again, we recommend that a section on Colorado Roadless, including the difference between the different tiers, be included in the document and be included within the Manageability portion for each proposed area.

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



Normand Birtcher
Resource Forester