



# Montrose Forest Products, LLC

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September 21, 2021

Mr. Chad Stewart  
Forest Supervisor  
GMUG National Forest  
2250 South Main Street  
Delta, Colorado, 81416

Dear Chad:

Montrose Forest Products, LLC is pleased to offer the following comments regarding the GMUG Forest Plan. As a member of the timber industry in Colorado with 98 direct employees and over 150 logging and trucking sub-contractors working on our timber sales, Montrose Forest Products, LLC is extremely interested in the GMUG National Forest maintaining a vibrant timber harvesting program. 98% of our log supply comes from the USFS and historically the GMUG National Forest has provided 60% to 70% of our annual timber volume. Therefore, we are heavily invested in the GMUG maintaining as large of a timber sale program as possible into the decades ahead.

The following are some comments we'd offer:

- We recognize that recreation is the GMUG's #1 economic contributor but that may change over time if we don't increase the pace and scale of timber harvesting to prevent catastrophic wildfire and further insect and disease outbreaks. Few if any recreational users want to recreate in a dead forest.
- The GMUG is a critical head waters Forest. Unfortunately, many of the watersheds are not healthy and need more attention with forest management activities.
- Much of the positive economic impact on the GMUG comes from hunting. We must manage timber habitat to keep our wildlife populations healthy plus provide for continued recreational opportunities. There are something like 50,000 big game permits issued annually on the GMUG.
- The GMUG has one of the largest rangeland resources base of any National Forest in the nation which provides major economic benefits to our local communities.
- The GMUG is one of the largest commercial timber producing forests in Region 2 and supplies a good portion of timber to the largest remaining sawmills in Colorado, Montrose Forest Products, LLC.
- Many of the specific categories within the plan have desired conditions that will be difficult to monitor or show progress long term.
- The same categories lack specific objectives. Socioeconomics is of specific concern.
- Desired conditions for forest structural stages have too large of range (pages 13-14 of the draft plan). We are especially concerned with the high amount in the later

- structural stage. This could become an argument not to manage timber and will, of course, reduce resilience.
- The draft plan increases the buffer zone for riparian areas to 100' even on seasonal or intermittent streams. This is increasing the risk to our riparian areas.
  - Timber and other Forest Products do not have any specific objectives. Why? We cannot accept this as a timber industry.
  - The Management Approach under timber products (best management practices to maximize carbon sequestration) is concerning and needs additional language that recognizes that locking up carbon in manufactured wood products such as lumber is a best management practice.
  - It will be difficult to meet objective FW-OBJ-WTR-04 if Alternative D is chosen.

We support Alternative C which promotes active management for the following reasons:

- The suitable acreage will be raised to 986,500 acres which simply represents those acres on the GMUG not legislatively restricted from management such as wilderness or roadless areas. This is very important for USFS land managers to have the ability to deal with issues across this acreage such as insect outbreaks or fire if, and when they occur. We have seen over the past two decades the devastating effect on our forests across Colorado from Pine Beetle outbreaks, Spruce Beetle pandemics and wildfire. The GMUG has lost 343,000 acres of spruce from the Spruce Beetle. By increasing the suitable acreage that can receive treatment, the GMUG is taking a pro-active approach to reduce tree mortality. Further, increasing the manageable acreage to this level will ensure that USFS land managers can access more of the GMUG watersheds to aid in protecting our water sources that is so important to not only Coloradans but to millions of people downstream.
- This alternative also allows the GMUG to manage timber up to a 60% slope versus the current limitation of 40% slope on the existing Forest Plan. We have seen over the past 30 years logging technology improve almost exponentially with innovative machinery that can operate in more difficult terrain and conditions without causing resource damage. And who knows what technology lies ahead for land managers in the future? The possibilities seem endless so it is encouraging that the GMUG is not limiting timber management to today's existing technology but rather is looking to future tools which can allow for timber management on steeper slopes. We certainly support this reasoning.
- The GMUG has identified that the sustainable harvest level over these acres is almost 128,000 ccf annually. Alternative C will allow the USFS to harvest an average of 55,000 ccf annually in the form of sawtimber, aspen, fuel wood and salvage. We strongly encourage the GMUG to define this 55,000 ccf as an average harvest level, not a ceiling or maximum cap. The GMUG should have the freedom to harvest higher levels annually in the event of insect outbreaks, fire salvage, improved timber markets and so on without having to go through a Forest Plan revision as was the case a decade ago when the Spruce Beetle Pandemic started. We strongly encourage the GMUG planning staff to word the Forest Plan accordingly to allow for flexibility in the annual harvest levels.
- This Alternative identifies that 214,700 acres of the 986,500 acres in the suitable acreage is made up of Aspen stands. Currently there is little to no financially feasible commercial markets for Aspen on the GMUG other than small amounts of firewood. Over the first 10 years of this Forest Plan the GMUG plans to increase the aspen

- harvest from 2,000 ccf per year to 10,000 ccf annually. While we support aspen management as a member of the timber industry, we would encourage the GMUG to make sure and offer sufficient Sawtimber volume annually to sustain existing timber industries who depend on the GMUG conifer program. Therefore, we recommend that the aspen program be above and beyond the 55,000 ccf annual average timber offerings. Then, over time and if, and when a market develops for aspen, the GMUG could offer sales of this species over and above their sawtimber and fuel wood program which would average around the identified 55,000 ccf per year.
- Alternative C would increase the opening size from 40 acres to 100 acres when treating Aspen and Lodgepole pine stands. We support this decision as it will allow USFS land managers more flexibility to treat these species on a broader scale, particularly when dealing with Sudden Aspen Death Syndrome, Pine Beetle outbreaks and Mistletoe.

Again, we feel that of the 4 alternatives proposed, Alternative C seems to us to be the one that best manages the most on the GMUG over time. However, we would suggest that the planning team consider a fifth alternative that allows for more annual harvesting or vegetation treatment closer to the sustainable harvest of 128,000 ccf per year. We understand that this would be challenging but it would provide timber industry more security with more timber being made available for sale annually. Also, if you are interested in trying to develop a long term, sustainable, financially viable market for aspen then we would suggest you increase the acreage and volume targets annually to hopefully entice industries to invest in infrastructure that can utilize this species. Having an alternative that has a target closer to the sustained harvest level of 128,000 ccf also gives existing industry such as ours the assurance to continue to make improvements in the mills. The catch phrase over the past two years on National Forests in Colorado has been to “increase pace and scale” on timber management. This of course is the result of the huge amounts of timber that has died over the past 2 decades throughout the state. Increasing the level of acres treated annually will reduce forest densities which have been stressed by drought; promote more carbon sequestration when timber is turned into lumber; reduce carbon emissions from older trees; promote increasing regeneration for the next forest; reduce fire danger; slow the spread of beetle activity and mortality; help land and water managers speed up the process of protecting our extremely important watersheds; improve maintenance on USFS transportation systems into the Forest with loggers grading road surfaces more frequently and by collecting more Surface Rock Replacement dollars from timber purchasers and help local economies by increasing jobs for a variety of primary and secondary employment opportunities related to the timber industry.

Colorado's population has been expected to grow by 2 to 3 million people in the next 20 to 30 years so one can imagine that the number of people visiting our National Forests will also increase accordingly. Not only will demand for lumber grow but the pressure on the USFS to maintain their roads, trails, camp sites and other infrastructures will increase as well. Keeping our Forests in as healthy a condition as we can over as large a landscape as possible is paramount when considering a steady increase in Forest Users of all kinds.

Lastly, one item we do not support is that timber purchaser's will be required to monitor and treat noxious weeds on their USFS timber sales at the Purchaser's cost. This puts too much financial burden on timber Purchaser's and should be dropped from the Forest Plan. The plan even states that this added requirement for timber purchasers may be too expensive for them could result in no-bids.

Thank you again for taking the time to read our comments and we look forward to future dialogue on the GMUG Forest Plan.

Respectfully,

A handwritten signature in blue ink, appearing to read 'Tim Kylo', with a stylized flourish extending from the end.

Tim Kylo  
Montrose Forest Products