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Organization: Delta, Montrose, & Mesa Counties BOCC

Title:

Comments: FW: Additional Comments from Montrose, Mesa, Delta

Sharing - these just in. Please take a look at the timber remarks.

From: Elyse Casselberry [mailto:ecasselberry@deltacounty.com]

Sent: Tuesday, July 30, 2019 7:24 AM

To: Staley, Samantha J -FS <samantha.j.staley@usda.gov>; Jon Waschbusch <jwaschbusch@montrosecounty.net>; Amber Swasey <amber.swasey@mesacounty.us>; Robbie LeValley <rlevalley@deltacounty.com>

Subject: Additional Comments from Montrose, Mesa, Delta

Samantha,

Delta, Montrose, and Mesa counties would like to share some additional comments on the GMUG Forest Plan with you in addition to comments each county submitted to you previously. These comments were generated as a result of us reaching out to user groups to capture their input following release of the draft plan and open houses. Please feel call if you have any questions, and thank you for the opportunity.

Elyse Ackerman-Casselberry

Community & Economic Development Director

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PLEASE NOTE MY UPDATED CELL PHONE NUMBER!!

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Timber interests on the GMUG

Commenters

Norm Birtcher, Resource Forester, Montrose Forest Products

Doug Jones, Doug Jones Sawmill, Grand Junction

Eric Sorensen, Delta Timber, Montrose

Marti Whitmore, Club 20 Public Lands Committee

Chad Stewart, Interim Forest Superintendent

General Comments on Jobs

Timber products from GMUG create up to 230 direct jobs across the three counties and include employment cutting, hauling, milling, and additional forest byproduct use as far away as Gypsum for biofuel at Eagle Valley Clean energy biomass plant; chips, for mulching materials and sawdust for playgrounds and animal bedding. Montrose Forest Products is the largest forest product operator on the forest with 93 direct jobs on one "super shift" per week of about 50 hours.

Timber sales and administration within the GMUG portion of the Forest Service also creates up to 18 additional positions across the three zones created for timber management across the GMUG

The timber harvest on the GMUG amounts to approximately 3 million board feet per year. Hauling distance becomes the critical factor in the forest product calculus, with the forests surrounding the Montrose, Delta and Mesa counties contributing an equal amount of timber while the preponderance of the timber for the mill now sourced in the Gunnison and Saguache area.

Specific Plan comments from the timber industry

1. Have the plan state what the forest is capable of producing (formerly known as "Allowable Sale Quantity") on a sustained basis on slopes less than 40 percent. Current numbers show it at a level of 76,725 CCF.

2. At Montrose Forest Products, seven of 10 logs come from the GMUG forests and include live lodge pole, spruce and ponderosa, and beetle-kill timber, with aspen contributing a significantly smaller amount. Additional aspen timber availability is not needed by the industry currently; timber harvest should prioritize the conifer species.

3. The optimal amount of timber for the Montrose facility would be 84,000 CCF

(hundred cubic feet). Small operators such as Doug Jones Sawmill in Mesa County needs 1.2 million board feet a year of beetle kill (2400 CCF). He no longer cuts in the field but purchases from others who do.

4. In the past, some smaller operators sometimes feel left out of the process by the Forest Service because the timber world operates on larger scale economics and they were unable to participate at that scale. Make some timber sales at a smaller scale so small operators can participate, or partition larger sales.

Water comments for revised GMUG plan

Commenters:

Chris Treece, Colorado River District

Steve Ryken, Ute Water Conservancy District

Steve Anderson, manger Uncompahgre Valley Water Users Association Steve Alvey, River District Board member from North Fork, Delta County Martha Whitmore, Montrose County Attorney

bypass flow should be applied as a last resort only.

The agency and stakeholders have identified twenty-two alternatives to federal bypass flows. Bypass flows should only be applied to permit holders once those 22 alternatives have been exhausted.

They include habitat improvement, purchase of storage rights and other alternatives.

2. Combine forest projects when possible

Whenever it is possible, analyze Forest Health and Watershed Health projects simultaneously, so they can be considered in concert.

It all happens on the same piece of dirt. They both have the ability to positively impact long-term water QQ.

For instance Ute Water Conservancy has an MOU with the Forest Service on fuels reduction with a particular focus on projects in its watersheds on Grand Mesa, the primary water source for the district and its 85,000 domestic users.

The water district also has operation and maintenance plans on filed with the Forest Service for water infrastructure maintenance in roadless portions of the Grand Mesa.

3. Motorized and mechanical access to Forest is necessary for safe operation and maintenance of water facilities.

This is probably the biggest sticking point. Make sure Forest plan recognizes this.

Where possible streamline the approval process for maintenance and operation of water systems. There is a finite window of time between snowmelt and snowfall, and access, maintenance and operation of water system infrastructure must be accomplished efficiently within that window.

4. Oppose additional wild and scenic provisions or expansions, wilderness expansion, new wilderness and areas managed for wilderness.

Water management activities on those lands are unnecessarily cumbersome or even prohibited. And managing forest health projects on such lands is rendered equally difficult.

For example, seek to avoid a Bolts Ditch scenario in Minturn, where the Forest Service largely denied access for maintenance and operation of a headgate because it was less than 100 yards within wilderness boundaries. Remedying that literally required an act of Congress and 6 years.

Additional:

Encourage GMUG to continue to create partnerships with stakeholders to find creative solutions to forest issues.