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Title:
Comments: To Whom it May Concern:

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 ijS it is revised, Montrose Forest Products would like to submit the following comments regarding the Working Draft of the Forest Plan. Furthermore, we expect to provide specific comments during the remaining process.

Plan Components

[bull] Desired Conditions - some of the Desired Conditions do not meet the 2012 Rule definition of a Desired Condition because they are not measurable and cannot be monitored to determine whether or not they are being achieved. For example, FW -DC-AQ -01, "The overall quality of the air contributes positively to human and ecosystem health, visibility, multiple uses, and wilderness values" is not

measurable and cannot be monitored. We recommend rewriting all Desired Conditions to conform to the definition in the Planning Rule.

Fire and Fuels Management (FFM)

[bull] Fire Management Emphasis Areas

o While we support the use of prescribed fire to manage the resources, we are concerned about the potential loss of commercial timber to natural disturbances, especially in areas already covered by existing NEPA (i.e. SBEADMR, Taylor Park, etc.). We recommend adding commercial timber to the list under the Protection Emphasis Areas on page 24.

Soil Resources (SOIL)

[bull] Giv en the advancement of harvesting equipment and the n iw ability to treat slopes over 40% with mechanized equipment utilizing teth ired equipment such as

Ponsse, we disagree with FW-GDL-SOIL-04. We recommend rewording the guideline to state, "To protect soil quality, ground based equipment for vegetation management should only operate on slopes less than 40 percent, unless utilizing tethered or other high flotation equipment. This is especially important to maximize flexibility as we continue to work in critical watersheds or within WUI.

Timber and Other Forest Products CTMBR}}

[bull] Rather than having a restri<:ted number for FW-OBJ-TMBR-01, we request the annual offering of forest products be based on what the suitable timber base is capable of producing on a sustainable basis. Given the recent GIS exercise completed by the GMUG, we feel the number for conifer sawtimber on slopes less than or equal to 40% should be approximately 76,725 CCF annually. Aspen, conifer sawtimber on steeper slopes, fuelwood, and other products should be in excess of this number.

Natural Areas with Focused Manawnent (MA 3)

[bull] Colorado Roadless Areas - MA 3.1 (CRA)

o While the intent of Colorado Roadless is to primarily let natural process dominate, exemptions for forest management do exist. Therefore, we recommend adding language to MA-DC-CRA-01 to state, "Natural processes within the context of the range of natural variability (insects, disease, and fire) occur with minimal human intervention, unless management is necessary to protect life and property."

Appendix 8. Timber Suitability Analysis

[bull] Operable Areas During the Planning Period

o Please see note above regarding soil resources. We recommend not removing slopes over 40%, as they are now feasible to be treated.

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 FORJST PRODUCTS, LLC

Normand Birtcher Resource Forester