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November 16, 2021

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

Dear Mr. Stewart:

As an employee of Montrose Forest Products for over 20 years and a professional Forester for 38 years I am writing to share my comments on the Draft Revised Land Management Plan (Plan) and Draft Environmental Impact Statement (DEIS) for the Grand Mesa, Uncompahgre, and Gunnison (GMUG) National Forest. Several overarching comments are:

Of the three action Alternatives, I strongly support Alternative C as I feel it is the best alternative in terms of actively managing the forest, protecting local jobs, and ensuring there is a forest in the future. Alternative Chas the most flexibility to treat areas when necessary to prevent catastrophic wildfire and insects and disease, while at the same time providing sustained volume to existing mills and treating more acres of hazardous fuels. Alternative C shows the greatest movement toward achieving desired conditions and Alternative C has the greatest economic impact of the three Alternatives, as well as the highest number of associated jobs. Given this, I recommend Alternative C, as modified by the comments below:

* The Annual Projected Timber Sale Quantity (PTSQ) should be higher than the proposed 55,000 ccf. Ideally, I would like to see a PTSQ of 70,000 ccf per year. Furthermore, the Plan should include language that any PTSQ is an average harvest level, not a ceiling or maximum cap.

As written, I do not support Alternative D and feel it will cause irreversible harm if chosen. Alternative D adds a lot of restrictions that make active forest management more difficult to implement and, in some cases, prohibits it altogether. It prohibits salvage, reduces the PTSQ and treats fewer acres of hazardous fuels. This direction, along with the added restrictions, will significantly reduce the ability of the Forest Service to achieve the desired conditions and objectives of the revised plan. For instance, almost every plant/tree species with the GMUG is departed/at risk regarding the distribution of structural stages. Not being able to manage the species across the entire landscape will make it hard to achieve the desired structural stages.

Specific comments on the Draft Plan and Draft EIS are below:

Draft Plan

Chapter 1 - The Plan clearly states that Recreation is the GMUG's number one economic contributor (page 8). I feel this is an unfair statement regarding economic benefits from the GMUG, especially given the details presented in the DEIS. The DEIS states that recreation (under all alternatives) contributes $14 million in labor income, whereas as timber harvesting and processing activities in Alternatives Band C would contribute between $18.6 and $17.7 in labor income. I recommend rewording several of the statements on pages 8-9 of the Plan to better reflect the actual economic contributions. Furthermore, the Plan and the DEIS does a poor job of explaining how recreation and forest management aren't exclusive of one another and at times, makes the reader feel like one is more important than the other. Ifwe don't manage the landscape through active forest

management, catastrophic wildfire and insects and disease will change the forest so drastically that recreation will be drastically impacted. The same argument could be made for our communities that rely on forested watersheds and wildlife that need healthy forests to survive.

Chapter 2 - Overall, many of the Desired Conditions and Objectives need to be rewritten to meet the definition as defined by the 2012 Planning Rule as they are not specific enough to be measurable and cannot be monitored to determine whether progress is being achieved. I recommend rewording those that don't meet the definition.

Furthermore, some of the Forestwide Direction categories need actual objectives. For instance, I feel that Socioeconomics (SCEC) should have a specific objective that maintains the existing timber harvest and processing infrastructure to allow for economic vegetation treatment.

The Desired Conditions for forest structural stage distribution have too big ofrange (pages 13-14) and will be difficult to track progress long term. I am also concerned that some of the species are carrying too much density in the late-mid/late seral stage, leaving them vulnerable to future insects and disease epidemics.

Standard 04 under Invasive Species states that all contracts and permits shall include "standard operating procedures," yet that standard operating procedure is never defined in either the Plan or DEIS. This is especially concerning considering the language in the DEIS (page 400) that states the responsibility for noxious weed inventory, treatment, and monitoring moves to the contractor. While the Standard itself is not problematic (depending on the standard operating procedure), the interpretation (page 400) clearly goes too far. I recommend removal of this standard unless the standard operating procedure is defined and interpretation language in the DEIS is removed.

The Management Approach under Timber and Other Forest Products mentions best management practices (BMPs) to maximize carbon storage in silvicultural prescriptions, yet the BMPs are not defined. I feel this Management Approach should be removed unless the BMPs are defined and include the science of carbon storage through wood products.

The Proposed Monitoring Framework (pages 103-122) fails to provide any specific economic monitoring tied to harvest and milling infrastructure (likely due to lack of specific objectives). Additional language should be added to Table 27 to ask the question "is harvest and milling infrastructure being maintained?"

Appendix 8 - While I recognize that the 2012 Planning Rule only requires a sustained yield limit calculation on all lands that may be suitable for timber production, it is very hard to compare the sustained yield limit as presented

with the projected timber sale quantity (Appendix 2) under the different alternatives. The Plan repeatedly discusses the significant tree mortality as a result of the spruce beetle epidemic but doesn't provide the details of how/why that impacts the projected timber sale quantity. I believe the 55,000 ccfin Alternative Band C is arbitrarily low and should be higher based on the sustained yield limit.

Draft EIS

It would be helpful if the economic information that is scattered throughout the DEIS could be pulled into the Alternative details on pages 16-24.

As mentioned above, any climate change language should include information on locking carbon up through forest products (page 25).

The DEIS fails to disclose how design criteria that is used at the project level can prevent/minimize a lot of the concerns/negative impacts that are associated with certain actions (such as vegetation management). It also fails to discuss the other benefits that come from vegetation management projects, such as road maintenance, or the impacts of not doing certain management. For many of the affected environment discussions, it implies that Alternative D will have less impact simply because less acres are potentially going to be treated. This is an over exaggeration and doesn't give credence to the complexity of these ecosystems.

Thank you for your consideration. I would welcome the opportunity to work with you, your staff, and other stakeholders on the details of the draft Plan.