

MONTROSE FOREST PRODUCTS, LLC
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FACSIMILE TRANSMITTAL SHEET

TO: Scott Williams FROM: Norm Birtcher
 COMPANY: USFS - GMUG NF DATE: 8/30/13
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RE: _____

URGENT HARD COPY WILL FOLLOW Notes/Comments:

Comments to NOI SBEADMR
Project



Forest Products, LLC

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August 30, 2013

Scott Armentrout
Forest Supervisor
2250 Highway 50
Delta, Colorado 81416

RE: Notice of Intent: Spruce Beetle Epidemic and Aspen Decline Management Response; Grand Mesa, Uncompahgre and Gunnison National Forests (GMUG), Colorado

Dear Mr. Armentrout:

Montrose Forest Products LLC supports the GMUG response to the extraordinary challenge posed by the Spruce Beetle epidemic and Aspen Decline on the Grand Mesa, Uncompahgre, and Gunnison National Forests. The proposed action is both timely and necessary. We believe that the recent National Forest experience with the mountain pine beetle on three national forests in Northern Colorado demonstrated that a landscape scale response is imperative.

The published NOI contemplates that a draft record of decision will be released in winter of 2015. Given that the beetle epidemic and aspen decline are already causing substantial mortality on the GMUG, we urge you to use all available opportunities to expedite the decision process for this action. The proposed action is intended to address affected stands, improve resiliency and reduce wildfire and safety threats attributed to forest conditions. Time is a critical element of the Forest Service response to these issues. Lengthy analysis and process will handicap proactive management options, drive up costs of process, increase risk of wildfires such as the recent large-scale West Fork Fire, and very importantly will vastly increase costs of managing a landscape of dead trees.

The pace of the FS analysis needs to correlate to the pace of the effects of the insects and SAD. While insect epidemics are natural events they create challenges for the many interests on the national forest. The FS budgets cannot possibly address these issues without the offsetting receipts that can be attained by using timber harvest as a management tool. The values and offsetting receipts on timber sales decline as the dead trees deteriorate in the forests, and likewise the costs of treatment increase proportionately.

We have several specific comments related to scope and analysis as follows:

1. A 'No Action' alternative should be a compelling section. Delays or 'business as usual' systems of EA's by district would be too lengthy and costly to address the effects of a widespread epidemic. The potential for catastrophic wildfire and resulting damage to

- important watersheds, infrastructure and wildlife habitat, such as we saw on the Rio Grande National Forest, must be mentioned and analyzed in the "No Action" alternative.
2. All spruce-fir and aspen acreages, on the GMUG should be analyzed for possible commercial and non-commercial treatments. Not wildfire, insects or drought respect administrative designations on the landscape whether they are ranger districts delineations, lynx analysis units (LAU's), Colorado Roadless Areas "CRAs, or even suitability designations. In the interest of GMUG ecosystems, it would be prudent to conduct a forest-wide analysis for potential harvest and treatment.
 3. This analysis should be written with flexibility. Insect epidemics progress and the annual treatments should be adaptable to adequately address the changing forest conditions. In order to access timber while the resource is still commercially viable, larger acreages may be necessary in the first years of the project. The reduced per acre cost of treatment in commercially harvested areas warrants this flexibility.
 4. The proposed action appears to put sidebars (acreage ranges) on treatment acreage prior to scoping. If management objectives may be better achieved through larger commercial harvests or non-commercial treatments, the analysis should have the flexibility accommodate those future options. Damaging insects are no respecters of artificial acreage sidebars.
 5. The proposed action needs to address protection measures for infrastructure such as exiting roads and trails, buildings, electrical transmission lines and pipelines.
 6. The importance of healthy forests to our local rural economy should be analyzed in the EIS.
 7. We urge the Forest Service not to encumber purchasers of timber sales resulting from the proposed NEPA document with cumulative and onerous operating restrictions. For every acre being treated thousands more will lie untreated due to limitations of terrain, economics, wilderness, SMZ's, etc. These untreated acres also provide prime wildlife habitat for calving, nesting and fawning, winter range, as well as a host of seasonal recreation opportunities for we humans.

Finally we advocate for a process that allows for reducing costs and implementation of efficiencies in management. The USFS is facing millions of acres of beetle epidemics. While the GMUG is just facing these dynamics, the forest can't afford to proceed under constraints designed for a traditional timber sale system. Efficiencies will be essential to treat more issues at less cost. More acres treated containing sawlogs equates to increased timber sale receipts which equates to more issues (hazard trees) and acres managed.

We thank you for taking a proactive, professional and realistic approach to the spruce beetle and SAD, and we look forward to continued involvement in this process.

Sincerely,



Normand Birtcher
Resource Forester

*** RX REPORT ***

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