

COLORADO TIMBER INDUSTRY ASSOCIATION

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

Mr. Armentrout:

Colorado Timber Industry Association 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. Our forests are never static and most of Colorado forests are experienced drastic change in forest condition.

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 by improving resiliency and reducing wildfire and safety threats attributed to forest conditions. The end effect will shape the future forest and add age class diversity which will be important to many species of wildlife, and to all the folks who love and use our forests. 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 a 'business as usual' system of multiple EA's by various districts would be too lengthy and costly to address the effects of a widespread epidemic.
2. All spruce-fir and aspen acreages on the GMUG should be analyzed for possible commercial and non-commercial treatments. Wildfire, insects or drought do not 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 holistic, 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 could be better served through larger commercial harvests or non-commercial treatments, the analysis should have the flexibility accommodate those future options.
5. A driving consideration is having fuel breaks of the scale that can truly affect wildfires. The West Fork Fire shows clearly the need for this EIS to address the current and changing forest condition.

Finally we advocate for a process that allows for reducing costs and implementing efficiencies in management. The USFS is facing over 40 million acres of beetle epidemics nationally. Simultaneously, the federal FS budget is shrinking significantly. While the GMUG is just beginning to face 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 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. We believe that this course of action meets the USFS direction on 'Increasing the Pace and Scale' of restoration and resiliency, and all resulting projects will need to involve a variety of types to meet the infrastructure partners established in the GMUG. We look forward to continued involvement in this process.

Sincerely,

Carl Spaulding

Carl Spaulding
President

Nancy Fishering

Nancy Fishering
Colorado Timber Issue Coordinator