



Montrose Forest Products, LLC

P.O. Box 1149, Montrose, CO 81402 T: (970) 249-0812

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Scott Armentrout, Forest Supervisor
GMUG National Forest
2250 Highway 50
Delta, CO 81416

SUBJECT: COMMENTS RE SBEADMR EIS

Dear Mr. Armentrout,

We wish to submit additional comments regarding the SBEADMR EIS and ask that you consider them before publishing the draft document.

WE CONTINUE TO SUPPORT ALTERNATIVE 2 – THE PROPOSED ACTION

Treatments are necessary on the suitable timber base in back country as well as WUI and areas of public safety concern. Only 6,000 acres per year of treatment are proposed. If Alternative 3 (Public Health and Safety Focus) is selected there will be insufficient volume to supply local industry under this EIS because average merchantable sawtimber volume per acre in WUI and areas of public safety concern are lower than on better sites in the suitable timber base in the back country. This will have the unintended consequence of forcing harvest under other NEPA in green stands not yet affected by spruce beetle. There is sufficient dead and dying spruce timber to supply our sawmill for several years if we are granted access to harvest it. We prefer to utilize the dead timber now while it is still merchantable and save the green timber for after the spruce beetle epidemic is over. Alternative 3 will increase Forest Service timber sale prep costs on a per unit basis. Reforestation costs will be lower and planting success will be higher when working on the best sites. Forest Service budgets are already insufficient. The Forest Service must take advantage of all cost efficiencies possible and this includes prioritizing salvage on higher sites – not just in WUI and areas of public safety. Protecting water quality in important watersheds affected by spruce beetle should also be high priority under the EIS. It will be necessary to do salvage on suitable acres in back country to accomplish this. Alternative 2 allows the Forest Service needed flexibility to address these issues. None of the other alternatives do. The Forest Service is still governed under a multiple use mandate – not a Park Service preservationist agenda.

TREATMENTS IN WUI MUST USE AGGRESSIVE SILVICULTURE

If fuels are to be effectively reduced in WUI and areas of public safety concern, treatments must be aggressive. Communities, infrastructure, roads critical for ingress and egress, and public utility corridors cannot be adequately protected unless nearly all dead trees are cut and unless density in green stands is significantly reduced. Re-entry periods have historically been long; in

excess of 50 years. Therefore, treatments must be aggressive in this entry to allow for the inevitable buildup of fuels that will occur before the next.

TIME IS OF THE ESSENCE

We urge the Forest Service to proceed with all haste in finishing the EIS and implementation of the project. Dead spruce trees are deteriorating faster than originally anticipated. The forest products industry is the most cost efficient tool at your disposal to accomplish stated objectives. If dead sawtimber is not expeditiously harvested it will no longer be merchantable for manufacture of lumber. We anticipate it will only be usable 3 to 5 years post mortality. Costs to treat areas of concern in WUI and public safety will skyrocket if they cannot be diluted by the value of the timber.

OPERATING RESTRICTIONS ON LOGGING MUST BE REASONABLE

Our sawmill operates year round. In order to supply it with logs we must be allowed to work in the woods whenever weather and soil moisture conditions permit. Calving restrictions are unnecessary. Deer and elk are not threatened or endangered species. They are actively hunted and killed for at least 4 months of the year. In many units elk numbers are still above desirable population densities. Deer and elk are mobile. We operate on less than 1% of the forest area at any one given time. The few animals that may be disturbed by operations can move to nearby adjacent areas to successfully calve and fawn.

Winter is often the best time to log. Soil compaction is much less of an issue with snow cover on the ground. There are usually less conflicts with other forest users. Wet areas are frozen and can be entered. Potential conflicts with winter recreationists can be resolved if we are allowed to negotiate with snowmobile clubs, etc. a few months prior to entry. We have demonstrated this time and again. Winter prohibitions on logging should be dropped.

POSTIVE EFFECT ON LOCAL ECONOMY

Sawlogs from SBEADMR will be critical to sustain the local forest products industry. Montrose Forest Products directly employs 83 persons year-round with good paying blue collar manufacturing jobs and benefits. We also contract with eight (8) local logging contractors each employing 3 to 6 persons plus thirty (30) plus log truckers. The West Slope of Colorado, and Montrose County in particular, is an economically depressed area of the state. These jobs are important. There are also many ancillary jobs in the community such as restaurants, fuel suppliers, parts houses, etc. that derive a portion of their livelihood from doing business with the timber industry.

Thank you for the opportunity to provide additional comments in support of the preferred alternative #2.

Sincerely,
MONTROSE FOREST PRODUCTS, LLC

Normand Birtcher
Resource Forester