



Montrose Forest Products, LLC

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David Casey
c/o USDA San Juan National Forest, Dolores District
29211 Hwy 184
Dolores, CO 81321

SUBMITTED VIA ONLINE: <https://cara.ecosystem-management.org/Public/CommentInput?Project=54682>

SUBJECT: Lone Pine Vegetation Management Project

Dear Mr. Casey:

Montrose Forest Products, LLC relies on timber output from the San Juan National Forest as part of our overall wood supply and therefore, are very supportive and excited for the Lone Pine Vegetation Management Project. Recognizing the importance of providing useful comments during the initial scoping, we hereby submit the following detailed comments/suggestions.

Overall, we are very supportive of the San Juan National Forest being proactive in responding to the on-going beetle epidemic that is impacting pine stands within the project area. Not only does the project address the recent mortality, it also address the surrounding stands with the goal of making them more resilient and effective in fighting off future beetle attacks. We are also very supportive of your initiative to actively increase age class diversity and structural diversity within the project area. As our forests face increased pressures from climate change, it will be crucial to have forests that are more resilient. Given these conditions, this firm and their 85 direct employees, concur with the Purpose and Need as discussed on page 4, as well as the Proposed Actions on pages 7-9.

Detailed Comments – Proposed Actions

- Currently, Montrose Forest Products does not have a market for aspen or POL (products other than logs) and/or biomass. As the project is further developed, please keep in mind that forest product markets change rapidly and therefore it is imperative that flexibility be built into the overall project design, including design criteria and specific silvicultural treatments. Some prescriptions, such as

precommercial hand thinning, commercial thinning, and mastication may need to be accomplished through contracting methods such as stewardship.

- As written, the proposed activities have the Normal Operating Season (NOS) listed as April- December. This is very concerning as Montrose Forest Products heavily relies on the ability to conduct winter logging. We ask that you consider not limiting the NOS within the NEPA document.
- Keep in mind that road maintenance (blading, drainage, and surfacing), the reopening of level 1 roads, and road decommissioning can be very expensive. Therefore, the volume per acre and/or unit must be high enough to be cost effective. Furthermore, temporary roads can be very expensive and should be minimized as possible.
- While we appreciate the concept of using design criteria to address concerns such as regeneration and water quality protection, please recognize that design criteria can be written so stringent that the project becomes infeasible. Therefore, we ask that you carefully consider each design criteria and make sure they are tied directly to the existing forest plan. We also ask that the forthcoming analysis explicitly discuss and analyze the costs for implementing the various design criteria.
- Due to the unknown defect and merchantability when salving dead/ dying Ponderosa pine, we recommend utilizing the following merchantability specs: 10.0" d.b.h, 7.0 inch top d.i.b., 8' 4" length, 10.67 net merch. factor.

We appreciate your consideration of these comments and suggestions as you move forward with the planning of the Lone Pine Vegetation Management Project. I would be happy to discuss these comments if you have any questions.

Sincerely,
MONTROSE FOREST PRODUCTS, LLC



Normand Birtcher
Resource Forester