



Montrose Forest Products, LLC

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0812

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October 30, 2018

Shelby Limberis
c/o Kevin Warner, Acting District Ranger
PO Box 309
Carbondale, Colorado 81623

SUBMITTED VIA FAX: (970) 963-1012 and online: <https://cara.ecosystem-management.org/Public/CommentInput?Project=52653>

SUBJECT: County Line Project Notice of Proposed Action

Dear Ms. Limberis:

Montrose Forest Products, LLC heavily relies on timber output from several National Forests in Colorado, including the White River National Forest. Thus, we are very excited about the County Line Project. Recognizing the importance of providing useful comments on the Notice of Proposed Action for the Aspen/Sopris Ranger District, below you will find detailed comments/suggestions that we hope you will consider as you further develop the project.

Overall, we are very supportive of the County Line Project and your initiative to actively increase age-class and structural diversity within the project area to improve forest resilience. As our forests face increase pressures from climate change, it will be crucial to have a diversity of species that are varied in age and size in order to be more resilient. Given these conditions, this firm and their 85 direct employees, concur with the Purpose, the Need for Action, and the Proposed Action as stated on pages 2-7. Additionally, we appreciate that the document highlights the other added benefits that will be achieved if the project is implemented.

Detailed Comments – Notice of Proposed Action

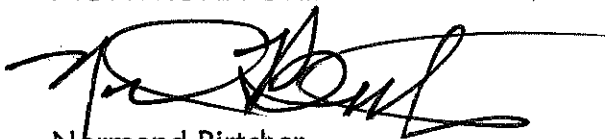
- Currently, Montrose Forest Products does not have a market for aspen or POL (products other than logs) and/or biomass. As the project is further developed, please keep in mind that forest product markets change rapidly and therefore it is imperative that flexibility be built into the overall project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

limited mechanical felling may need to be accomplished through contracting methods such as stewardship.

- Some of the project units are very small in size and may be difficult to implement cost effectively. Mobilization of equipment to different units can be very expensive.
- Keep in mind that road maintenance (blading, drainage, surfacing) and road decommissioning is also very expensive and therefore the volume per acre as well as per unit must be high enough to make road maintenance/road decommissioning cost effective.
- We are concerned with using prescribed fire in Management Area 5.13 – Resource Production – Forest Products as the purpose of this Management Area is to provide commercial wood products. Unfortunately, too often prescribed fire burns at an intensity that makes wood utilization in the future not an option. We recommend dropping prescribed fire from this management area unless it is used to only treat brush and can be done without risking the commercial wood products.
- As the project develops, we ask that you carefully consider each design criteria that is recommended and determine whether it is actually needed or whether concerns can be met through implementation contracts. Furthermore, if included, we ask that the forthcoming analysis explicitly discuss the economic costs for implementing the various design criteria. It is possible to have design criteria that are so stringent that the project becomes economically infeasible.

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

Sincerely,
MONTROSE FOREST PRODUCTS, LLC

A handwritten signature in black ink, appearing to read 'Normand Birtcher', written over a horizontal line.

Normand Birtcher
Resource Forester