



# Montrose Forest Products, LLC

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December 27, 2018

Richard Truex, Acting District Ranger  
c/o Brett Crary  
PO Box 190  
Minturn, Colorado 81645

SUBMITTED VIA FAX: (970) 827-9343 and online: <https://cara.ecosystem-management.org/Public//CommentInput?Project=53148>

**SUBJECT:** Muddy Pass/Sheephorn Project Notice of Proposed Action

Dear Mr. Truex:

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 Muddy Pass/Sheephorn Project. Recognizing the importance of providing useful comments on the Notice of Proposed Action for the Eagle/Holy Cross 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 Muddy Pass/Sheephorn Project and your initiative to not only actively increase age-class and structural diversity within the project area to improve forest resilience, but to also manage stand density in young stands of lodepole pine to remove dwarf mistletoe. 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, and are free from insect and disease in order to be more resilient. Given these conditions, this firm and their 85 direct employees, concur with the Purpose and Need for Action, and the Proposed Action as stated on pages 3-11. Additionally, we appreciate that the document highlights the other added benefits that will be achieved if the project is implemented. It is so crucial for the public to understand that these types of projects are multi-beneficial and are not being implemented just to provide wood to the timber industry.

#### 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 and the transportation network. Some prescriptions, such as coppice in aspen, precommercial thinning and range improvement 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.
- 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 fully believe this project can be adequately analyzed through an Environmental Analysis and does not need a full Environmental Impact Statement (EIS). Completing an EIS is very expensive and can take much longer, ultimately delaying the critical work that this project is hoping to accomplish.

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

Sincerely,  
MONTROSE FOREST PRODUCTS, LLC



Normand Birtcher  
Resource Forester