Montrose Forest Products, LLC
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October 9, 2019

Kara Chadwick, Reviewing Officer
ATTN: Objections
San Juan Public Lands Center
15 Burnett Court
Durango, CO 81301

SUBMITTED VIA EMAIL: SM.FS.r02admin-rev@usda.gov

SUBJECT: LONE PINE VEGETATION PROJECT

Dear Ms. Chadwick,

The following comments are submitted in behalf of Montrose Forest Products including, our 93 direct employees and 99 indirect contract loggers/log truckers. We rely heavily on timber output from national forests in Region 2 of the U.S. Forest Service and increasingly from the San Juan National Forest. Therefore, we strongly support the Lone Pine Vegetation Management Project. Recognizing the importance and magnitude of this project, Montrose Forest Products has actively participated in the process by submitting comments on both the 1st and 2nd draft of the Environmental Assessment. Therefore, having standing as outlined in 36 CFR Part 218, subparts A and B, we submit the following Objections to portions of the Draft Record of Decision and the final Environmental Assessment:

Environmental Assessment

2.2.1 – Tree Cutting and Removal

- We object to the basal area prescriptions as outline in the final EA and the Draft Decision Notice. As we stated in our comment letter dated March 21, 2019, we recommend the prescriptions be based on site index, rather than just a general range. We request that on good growing sites (high site index), the retained basal area be closer to 80 square feet of basal per acre across each stand. On lower site index sites, we request only cutting down to 50-60 square feet of basal area per acre. Varying residual basal area by site index will allow adequate residual growing stock to capture potential growth sufficient to allow commercial reentry in 20 to 25 years. The timber industry is making significant capital investments and depends upon decades long consistent even flow and sustained yield of sawlogs. Lower stocking levels may preclude commercial reentry for many more

years – even decades longer. This will have the undesired effect of starving and closing industry dependent upon this timber type upon completion of the current cutting cycle. Diversity in stand density will also promote diversity of wildlife habitat and other forest values.

Lower stand densities often regenerate to dense "doghair" thickets. While successful regeneration of ponderosa pine in the project area is a worthwhile goal and age class diversity is desirable and needed, the Forest Service does not have a good track record of accomplishing necessary pre-commercial thinning in a timely manner. "Doghair" stands would potentially stagnate for decades.

2.2.5 – Design Elements

- Fuels
  - We object to Fuels #4 as written due to the potential of inconsistency. We request a standard slash disposal policy for all project areas be developed.
- Wildlife
  - We object to Wildlife #2 and #3. We find these two design criteria to severely limit spring and early summer logging operations, which is crucial in Pondersoa Pine areas for several reasons (beetles, fire restrictions, etc.). For instance, while the Roundhead Beetle typically flies in the fall, other beetles fly in late spring, early summer. Ideally, it is best to harvest infected trees prior to beetle flight. We request these two design criteria be modified to allow more flexibility.

5.2 – Appendix B – Monitoring Checklist and Adaptive Management Actions

- Table 6 – Adaptive Management Actions Common to All Treatment Types
  - Noxious Weeds
    - We object to the proposed adaptive management action for noxious weeds as written as it is not clear how it will be implemented or how it will affect sales once they have been sold. We request additional clarification be discussed and potentially added to ensure this adaptive management action is feasible on the ground.

We look forward to working with you to resolve the issues listed above as you move forward with the Lone Pine Vegetation Management Project.

Sincerely,

Normand Birtcher
Resource Forester