



Montrose Forest Products, LLC

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March 2, 2020

San Juan National Forest
Dolores Public Lands Office
Salter Vegetation Management Project
Attention: Derek Padilla
29211 Highway 184
Dolores, Colorado, 81323

SUBJECT: SALTER VEGETATION MANAGEMENT PROJECT

Mr. Derek Padilla:

Montrose Forest Products, LLC appreciates the opportunity to comment on the Salter Vegetation Management Project. As a member of the timber industry in Western Colorado with a vested interest in harvesting and producing Ponderosa pine lumber, our 95 direct employees at the mill and approximately 120 people that make up our independent logging and trucking contractors are extremely supportive of any effort the San Juan National Forest makes to provide commercial timber for bid. We encourage you and your staff to work through this scoping process in a timely manner to ensure a steady supply of wood fiber to the timber industry.

We would offer the following comments specifically on Design Criteria items:

- We strongly urge the SJNF to not limit the construction of temporary road construction to access planned timber sale units as was done on the Lone Pine EA. The Salter Vegetation Management Project lies in areas where slopes, ground conditions and existing road templates require the absolute need for purchasers to be able to build temporary road locations on pre-approved USFS locations as necessary to economically log and haul the timber to mill sites. This must be incorporated into the final decision without restrictions other than those identified in the standard USFS "B" and "C" clauses. Otherwise no-bids on future timber sales may occur.
- We urge the USFS to use standard "B" and "C" clauses when dealing with the control and spread of noxious weeds and not add to or further limit harvest operations by requiring additional restrictions, equipment cleaning and so forth in the final decision.
- We urge the USFS to keep seasonal restrictions other than identified wildlife operating restrictions to a minimum. By allowing potential timber purchasers as much unimpeded operational timeframes as possible to complete any planned timber sales, you reduce cost to said potential purchasers and expedite the removal of timber in a timely manner. In this way you will help to achieve the overall goal of increasing pace and possibly scale of land/timber management on the SJNF as promoted by the Rocky Mountain Restoration Initiative and National USFS office.

- We encourage the USFS to keep residual basal areas where practical at 60 to 80 square feet of basal area per acre to ensure that stands are not overcut during first entries thereby promoting more long-term timber management on the SJNF over time.
- We urge you to allow for the previously agreed upon maximum Gross Vehicle Weight of 97,000 lbs. for log trucks removing timber from these planned sales as defined by the CDOT hauling rules for 5 axles trucks. Allowing for this weight limit reduces the number of log truck trips out of the USFS, reduces impacts/conflicts with other forest users and reduces costs to potential timber purchasers. We encourage you when re-constructing your main and secondary haul roads to allow for this weight limit.
- We ask that hauling restrictions be kept to a minimum and that trucks be allowed to haul on weekends and Federal holidays where practical again to maximize deliveries from the sales during operational seasons.
- Where pine beetles are present in the sale areas we encourage you to use Urgent Removal "C" clauses to ensure that infested timber is removed quickly.

Once again thank you for allowing us the opportunity to comment on this project and we look forward to seeing the final decision out in 2020.

Respectfully

A handwritten signature in black ink, appearing to read 'Tim Kylo', with a long horizontal flourish extending to the right.

Tim Kylo
Resource Forester
Montrose Forest Products, LLC

cc. file