



Montrose Forest Products, LLC

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February 21, 2020

Mr. Curtis Keetch
District Ranger
c/o Christopher McDonald
220 E. Market Street
Meeker, Colorado, 81641

Mr. Keetch:

Montrose Forest Products, LLC is pleased for the opportunity to comment on the proposed Yellowjacket Project on the Blanco District of the White River National Forest. As a member of the Colorado timber industry, we are always very interested in any USFS project that has the potential to generate coniferous sawtimber for possible bid. With 98 direct employees and approximately 150 independent logging contractors, log truckers & road construction crews, Montrose Forest Products, LLC very appreciative of any effort the USFS makes in providing sawtimber for bid. With an annual timber usage of 50 mmbf and with 99% of our annual wood supply coming from USFS timber sales, we are extremely pleased to see the White River National Forest and, in particular, the Blanca Ranger District, develop projects such as this one that provides sawtimber for the timber industry.

Regarding the Yellowjacket Project, we would offer the following comments:

- 1) Montrose Forest Products, LLC is a combined stud mill/board mill that cuts Engelmann Spruce, Sub-Alpine fir, Lodgepole pine, White fir and Ponderosa pine. In the past this mill has purchased and harvested timber from this area of the White River National Forest and is encouraged to see that you plan to develop timber sales in these species classes. We would state that your proposed silvicultural prescriptions including clear cut with Leave trees, coppice treatments, group selections and sanitation/salvage sales are correct and we support your efforts.
- 2) We support your implementation methods using ground-based logging systems as they have a proven track record of success throughout the Colorado USFS system. As you begin to develop your design criteria for timber sales we encourage you to keep sale acreages as large as possible to reduce multiple entries (i.e. move in/move out costs), allow for winter logging operations where practical, allow for weekend and Federal Holiday hauling options, keep Normal Operating seasons as long as possible, allow for ground based equipment to work up to the maximum 40% slope, keep removal volume/acre as high as possible (at least 6000 board feet per acre), design cutting units to minimize temporary road construction while keeping average skid distances at 1000' or less, keep specified road construction to a minimum, keep restrictions to hauling/harvesting to a minimum(i.e. hunting season restrictions, other user restrictions like snowmobile clubs, Lynx habitat restrictions, elk calving restrictions and so on) and

continue to allow skid trail widths up to 16'. In other words, design timber sales that allow potential purchasers to move through the sales quickly and efficiently with minimum delays/restrictions thereby reducing costs to the purchaser while possibly generating higher stumpage values to the USFS.

- 3) When designing timber sales it is absolutely imperative that you keep POL/non-sawtimber separate from saw timber sales. If POL/non-sawtimber must be included in a standard saw timber sale, then we cannot stress enough that this POL/non-sawtimber component must be offered as "Timber Subject to Agreement." In this way you will avoid the high potential of no-bid from sawmills such as Montrose Forest Products.
- 4) We highly recommend you sell timber by weight scale or 3P sample scale versus tree measurement/lump sum sales to avoid potential no-bids.

Once again, we appreciate the opportunity to comment on the Yellowjacket project and we look forward to working with you in the future to bring this proposed action to fruition. Should you have any questions regarding our comments please do not hesitate to contact me.

Respectfully



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