

February 18, 2026

Jennifer Schuller, Reviewing Officer/ Acting District Ranger
USDA Forest Service Aspen-Sopris Ranger District
125 W 5th Street, Eagle, CO 81613

Submitted via: <https://www.fs.usda.gov/r02/whiteriver/projects/68876>

Re: Comments on the Twin Peaks Project Draft Environmental Assessment for the Aspen-Sopris Ranger District

Introduction/Interest of Party

Montrose Forest Products ("MFP") employees and contractors presently, and plan in the future, to engage in timber removal in some capacity from the Aspen-Sopris Ranger District. MFP is a key economic driver for local communities on the Western Slope and employs approximately 100 employees in a rural area. There are an additional 125 employed through subcontracting to implement forest projects in the state. These activities include logging, hauling and roadbuilding.

MFP incorporates by reference as though fully set out herein the comments of Intermountain Forest Association.

MFP appreciates the opportunity to provide comments on the Twin Peaks Project Draft Environmental Assessment ("TPP DEA"). In general, MFP supports the Twin Peaks Project ("TPP") for meeting forest goals and objectives. Silvicultural prescriptions and emulation of natural disturbances in the management of spruce/ subalpine fir stands require careful consideration and is appreciated that the agency is doing their due diligence in maintaining a healthy forest. Incorporating strategic fuel breaks along POD lines with the project is encouraged. Supporting Black Hills infrastructure and upkeep is also key in the success of the forest and community.

MFP encourages the agency, where spruce budworm is at epidemic levels, to manage aggressively to stop the devastation of regeneration and weakening of mature timber. Silvicultural prescriptions and management should take an aggressive approach to harvesting. Prescriptions such as sanitation and clearcut should be used to create a break in vegetation to stop the advances. Allowing spruce budworm to exist at epidemic levels in the landscape will have higher consequences in the long term if not managed intensely now.

Creating defensible spaces and bringing fires from tree crowns to the ground is encouraged. Fuel breaks are great management tools in helping control fires and create safety for the public. MFP encourages the agency to treat past the 400', where practicable, with silvicultural prescriptions suggested within the TPP DEA. Opportunities to treat these additional acres past the 400' in the future will be difficult.

MFP supports moving the gate from Fourmile Park to Willy's Peak Trailhead given that the road is widened and ample turnarounds are created in the Willy's Peak area.

For the TPP DEA, MFP's objections are based on the exaggeration of public safety concerns and wildlife impacts that lead to too restrictive Design Features for treatments.

Summary of Comments

Logging and log hauling is already naturally limited to a handful of working days a year. When working in spruce/ subalpine fir timber types, windows where the ground is either dry or frozen enough are extremely limited. MFP's subcontractors' rolling average working year is less than 160 days. Taking away weekends, days around hunting seasons, and having no operations for all Federal holidays creates an unrealistic timeline to work to begin with. The additional restrictions from Recreation and Wildlife are setting the stage to make active management nearly impossible.

Timber sales are subject to adhering to Manual on Uniform Traffic Control Devices (MUTCD) standards. The MUTCD manual was developed for standardizing traffic control devices nationwide on anything from dirt secondary roads to highways. The public can navigate road construction, through MUTCD guidance, across the country at any time of the year. Between timber sales posting signage to MUTCD standards; publishing management activities in local paper; posting about management activities at trailhead kiosks; and the probability of sub-8-loads a day hauled, significant measures have been met for public safety. Because of these measures and the already limited days, there should be no additional restrictions for logging, hauling or road maintenance in relation to public safety.

1. A. Wildlife #1

Elk calving restrictions per the White River National Forest, Forest Plan, are from May 15-June 20. The design feature unnecessarily extends the restrictions to July 1. We assume this was done to overlap with Wildlife #2.

Remedy: Keep to original Forest Plan: May 15-June 20

B. Wildlife #2

Elk summer restrictions per the White River National Forest, Forest Plan, are from June 16-October 14. These restrictions were truncated to July 1-August 15. The forest acknowledged that impacts would be limited, "The 5.43 Elk Habitat summer concentration area (25,565 acres) and surrounding elk habitat identified by CPW (113,578 acres) are large enough to allow elk to move freely and avoid disturbances associated with vegetation management activities". With the same rationale, the agency should not have elk summer restrictions at all.

Remedy: No Summer Elk Restriction

C. Recreation #2

Log hauling on NFSR 300.3 being prohibited on weekends, holidays and one day prior to the start of each big game rifle-hunting season is unreasonable. NFSR 300.3 has many pullouts and with MUTCD standard signage, conflicts with hunting traffic would be limited. Log truck drivers are disincentivized to get stuck on haul routes so naturally self-regulate. When there is an uptick of traffic, hauling transitions to earlier hours to avoid interacting with public along haul routes. MFP also has upgraded to VHF Radios, same frequency band as the USFS. Since departing from CB, communications have greatly increased where log trucks can communicate with each other on where the public is at.

Remedy: Weekend hauling subject to agreement

Hauling allowed on non-major holidays (MLK, Presidents, Juneteenth, Columbus, and Veterans Day)

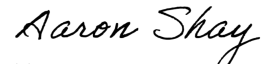
No hauling restrictions the day prior to major rifle hunting seasons

Conclusion

MFP encourages the USFS to actively manage its forests for the betterment of nature and public. The byproducts of active management are logs; these logs are manufactured in Colorado and lumber is sold and shipped across the country to help build America. Being able to treat public lands and do it through public process is very rewarding.

Our major concerns are not programmatic, but substantive in that the Design Features restrict active management to the point where it may become uneconomical to complete projects.

Sincerely,

A handwritten signature in cursive script that reads "Aaron Shay".

Montrose Forest Products, LLC

Aaron Shay

MFP Forester