



Montrose Forest Products, LLC

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February 12, 2020

Mr. Matthew McCombs
Attn: Pam King
Gunnison Ranger District
216 N. Colorado
Gunnison, Colorado, 81230

Dear Mr. McCombs:

Montrose Forest Products, LLC appreciates the opportunity to comment on the proposed Wilder Highlands Mountain Pine Beetle Response Project. As a member of Colorado's timber industry with 95 employee's, we greatly appreciate the USFS's efforts in maintaining a strong and consistent timber sale program while achieving sound forest management and forest pest control through projects such as this and we applaud your District's efforts in dealing with this potentially catastrophic Pine Beetle outbreak in a very timely manner.

In reviewing the Project Design Features for this proposed Pine Beetle Response we would offer the following comments:

- Under Water Quality/Soil Productivity you limit skidding to slopes of 35% or less. 40% is the standard under the GMUG Forest plan and this needs to be raised to that level.
- Under Water Quality/Soil Productivity you say that roads, trails and other soil disturbances should be designed to "roll" with the terrain to limit the use of cut and fills. This restriction will severely limit access to acreage that needs to be treated and create a more difficult situation for loggers to successfully cut and remove any timber from this project. We ask that this be removed.
- Under Wildlife you state that the operational periods does not overlap winter months, but does include flexibility to adjust future treatment periods according to monitoring data. If the operational period is adjusted, do not operate from December 1 to April 15 to avoid disturbing deer and elk on winter range. We would recommend you add "unless otherwise agreed to in writing by the USFS" to this restriction in the event it is found that in certain winters logging operations can occur that do not disturb elk and deer winter range. It gives you some flexibility year by year.

Finally, where you discuss commercial thinning options for treatment you state you plan to thin to a 4 foot to 12 foot crown spacing, or 80 to 120 square foot basal area in dense, immature lodgepole pole size timber stands. Recognize that this prescription cannot be accomplished with traditional, mechanical logging equipment used by the majority of independent loggers in Colorado (i.e. feller-bunchers, processors, wheel type skidders, etc.). This traditional equipment is too large to perform this type of thinning. You will be limited to the use of smaller logging

equipment systems which we are not aware exist in Colorado or you will have to perform this work by hand. Either way this will be slow and costly.

We encourage you to consider our comments in your final decision recognizing that these recommendations are designed to aid in completing this critical project in a timely and efficient manner for all concerned parties.

Once again thank you for the opportunity to offer comments and suggestions on this very important project.

Respectfully

A handwritten signature in black ink, appearing to read 'Tim Kylo', with a stylized flourish extending from the end.

Tim Kylo
Resource Forester
Montrose Forest Products, LLC

cc. file