



Intermountain Forest Association

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October 17, 2018

David Casey
c/o USDA San Juan National Forest, Dolores District
29211 Hwy 184
Dolores, CO 81321

SUBMITTED VIA ONLINE: <https://cara.ecosystem-management.org/Public/CommentInput?Project=54682>

SUBJECT: Lone Pine Vegetation Management Project

Dear Mr. Casey:

Intermountain Forest Association (IFA) is a member-based organization that advocates for healthy forests and healthy communities, including actively promoting sound forest management that provides a stable and sustainable supply of timber from public and private forestlands. Given that several of IFA's members heavily rely on timber output from the San Juan National Forest, we are excited about the proposed Lone Pine Vegetation Management project on the Dolores District. On behalf of the members of the Intermountain Forest Association, I appreciate this opportunity to offer comments on the initial scoping.

Overall, we are very supportive of the San Juan National Forest being proactive in responding to the on-going beetle epidemic that is impacting pine stands within the project area. Not only does the project address the recent mortality, it also address the surrounding stands with the goal of making them more resilient and effective in fighting off future beetle attacks. We are also very supportive of your initiative to actively increase age class diversity and structural diversity within the project area. As our forests face increased pressures from climate change, it will be crucial to have forests that are more resilient. Given these conditions, we concur with the Purpose and Need as discussed on page 4, as well as the Proposed Actions on pages 7-9.

Detailed Comments – Proposed Actions

- IFA members vary significantly in the businesses they run and the materials they can economically utilize. As the project is further developed, please keep in mind that forest product markets change rapidly and therefore it is imperative that flexibility be built into the overall project design, including design criteria and specific silvicultural treatments. Some prescriptions, such as precommercial hand thinning, commercial thinning, and mastication may need to be accomplished through contracting methods such as stewardship. Ideally, the best quality material would be offered via traditional timber sales, whereas lower quality/ small diameter would be treated via stewardship.
- As written, the proposed activities have the Normal Operating Season (NOS) listed as April- December. This is very concerning as most forest product businesses heavily rely on the ability to conduct winter logging. We ask that you consider not limiting the NOS within the NEPA document.
- Keep in mind that road maintenance (blading, drainage, and surfacing), the reopening of level 1 roads, and road decommissioning can be very expensive. Therefore, the volume per acre and/or unit must be high enough to be cost effective. Furthermore, temporary roads can be very expensive and should be minimized as possible.
- While we appreciate the concept of using design criteria to address concerns such as regeneration and water quality protection, please recognize that design criteria can be written so stringent that the project becomes infeasible. Therefore, we ask that you carefully consider each design criteria and make sure they are tied directly to the existing forest plan. We also ask that the forthcoming analysis explicitly discuss and analyze the costs for implementing the various design criteria.
- While some businesses may be able to cost effectively utilize blue stained Ponderosa pine, others may not due to their end market. Please try to keep flexibility in the merchantability specs, so as to ensure an economically feasible project at time of implementation.

We appreciate your consideration of these comments and suggestions as you move forward with the planning of the Lone Pine Vegetation Management Project. I would be happy to discuss these comments if you have any questions.

Sincerely,

Molly Pitts

Molly Pitts
Intermountain Forest Association
Colorado Programs Manager