



## Intermountain Forest Association

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October 30, 2018

Shelby Limberis  
c/o Kevin Warner, Acting District Ranger  
PO Box 309  
Carbondale, Colorado 81623

SUBMITTED VIA ONLINE: <https://cara.ecosystem-management.org/Public/CommentInput?Project=52653>

SUBJECT: County Line Project

Dear Ms. Limberis:

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 White River National Forest, we are excited about the proposed County Line Project on the Aspen/Sopris District. On behalf of the members of the Intermountain Forest Association, I appreciate this opportunity to offer comments on the Notice of Proposed Action.

Overall, we are very supportive of the County Line Project and your initiative to actively increase age-class and structural diversity within the project area to improve forest resilience. As our forests face increase pressures from climate change, it will be crucial to have a diversity of species that are varied in age and size in order to be more resilient. Given these conditions, this firm and their 85 direct employees, concur with the Purpose, the Need for Action, and the Proposed Action as stated on pages 2-7. Additionally, we appreciate that the document highlights the other added benefits that will be achieved if the project is implemented.

### **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 coppice in aspen, insecticide or pheromone application, planting seedlings, and hand feeling with limited mechanical felling 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.
- Some of the project units are very small in size and may be difficult to implement cost effectively. Mobilization of equipment to different units can be very expensive.
- 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.
- We are concerned with using prescribed fire in Management Area 5.13 – Resource Production – Forest Products as the purpose of this Management Area is to provide commercial wood products. Unfortunately, too often prescribed fire burns at an intensity that makes wood utilization in the future not an option. We recommend dropping prescribed fire from this management area unless it is used to only treat brush and can be done without risking the commercial wood products.
- As the project develops, we ask that you carefully consider each design criteria that is recommended and determine whether it is actually needed or whether concerns can be met through implementation contracts. Furthermore, if included, we ask that the forthcoming analysis explicitly discuss the economic costs for implementing the various design criteria. It is possible to have design criteria that are so stringent that the project becomes economically infeasible.

We appreciate your consideration of these comments and suggestions as you move forward with the planning of the County Line 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