

USDA Forest Service

White River National Forest

Aspen-Sopris Ranger District

Karen Schroyer, District Ranger

c/o Christopher McDonald

620 Main Street / PO Box 309

Carbondale, CO 81623-0309

 *Submitted Electronically*

December 18, 2018

Dear Ms. Schroyer,

I am writing to comment on your proposal to implement vegetation management activities on Basalt Mountain located in Eagle County, Colorado on the Aspen-Sopris Ranger District of the White River National Forest (WRNF). I represent West Range Forest Products (WRFP), located in Gypsum, Colorado. WRFP has been told that we will likely be issued Task Orders under the White River Long Term Stewardship Contract to conduct the initial roadside hazard tree removal along an approximately 2.4-mile stretch of the primary access road, as well as portions of the proposed larger timber salvage program. As such, we are obviously very interested in these project opportunities, and fully support the proposed actions, and would even support expanding the salvage operations to the fullest extent possible.

I recognize that post-fire treatments are controversial, but I support and encourage the WRNF to conduct post-fire salvage and other treatments wherever possible. While working for the Colorado State Forest Service I was in charge of post-fire treatments on Denver Water’s properties following the Hayman Fire. Several thousands of acres were successfully treated and more than 10-million board feet were salvaged. Following my retirement from CSFS I was in charge of developing post-fire treatments for hundreds of acres burned during the fire in the Black Forest near Colorado Springs. I understand that these treatments and activities were conducted primarily in ponderosa pine-dominated forest stands, but the treatments in my mind were quite successful, and the lessons learned transferrable to other timber types. (For example – where crown fires have occurred and soils have been damaged, harvesting operations help break-up the hydrophobic soil layer, allowing rainfall a better opportunity to soak into the soils instead of running off and eroding the burned, barren soils.) If interested I have PowerPoint presentations for both projects that I’d be happy to share with your planning team.

West Range Forest Products has the primary fuel supply contract with Eagle Valley Clean Energy (EVCE) for their wood-fired power plant located in Gypsum, Colorado. While we typically try to salvage and merchandise whatever sawlog and/or pole-sized materials we can from our harvesting operations, we would likely grind all materials, except those required to be left for erosion control purposes, from the initial roadside hazard tree removal area. Because we have the ability to grind and remove woody materials, we can “fine-tune” what is removed to achieve needed erosion control measures, without leaving excessive fuel loadings following the harvest activities.

For operations within the proposed salvage areas, we would try to merchandise as much of the sawtimber-sized materials as possible, while still removing, through grinding, as much of the smaller materials as environmentally prudent. Following treatment, these operations will provide a much cleaner-looking area, with acceptable fuel loadings. This is desirable from a fire and watershed protection standpoint. Should a second fire pass through the harvested areas, these lower fuel loadings will help protect forest soils because heavy fuel loadings of downed timber can further damage and sterilize the soils making them, again, hydrophobic and subject to further erosion and loss of productivity.

I now offer these specific comments regarding the proposed projects:

1. We believe the Forest Service can and should proceed with a finding of no significant impact because the proposed activities, without going to the time and expense of an environmental impact statement. This is because the majority of the treatments are being conducted for the purpose of personnel and visitor safety, wildfire hazard reduction, and reduction of post-fire erosion and flooding. In addition, the majority of the treatments will be occurring within the WRNF’s suitable timber base.

Such areas have been identified for timber production, and in my opinion, as good stewards of the land, the FS has an obligation to salvage as much merchantable material from such lands, and get them back into production as quickly as possible. Finally, time is of the essence when dealing with the salvage of burned timber as it can quickly degrade due to borer activity, rot, checking, and other damaging agents.

If there are opportunities to expand harvestable acreage beyond that proposed within the suitable timber base, do so. Due to watershed recovery concerns, are there any municipal water companies that would provide funding that could allow expanded operations?

1. Similarly, if any of the areas within the burned area can be exempted from further delay through the use of any of the various expedited planning authorities now available, do so.
2. We also encourage the Forest Service to conduct salvage operations to the fullest extent possible for areas within roadless areas where authorities and exemptions allow.
3. Related to **Goal 5 Public Collaboration** on page 10, are there opportunities to utilize Good Neighbor authorities to expedite treatment implementation and/or cross boundary treatments?
4. We believe that the array of treatment types proposed are suitable and appropriate for the variety of post-fire conditions likely to be found within the proposed treatment areas.
5. Utilize wording in your decision to allow up to 5.0 miles of temporary road ***at any one time*** to allow additional temporary road construction should that be necessary. I have seen the Forest Service hemmed in in other planning efforts where they gave a cap on temporary road mileage, and then encountered a need for additional roads during project layout. Having the ability to close out temporary roads, and then construct additional roadways can help with this issue.
6. It is unclear to me if the use of the trails listed in Table 4 on page 9 for temporary roads are part of the estimated 10 temporary roads described on page 8. Similar to the previous paragraph, don’t tie your hands by giving a specific number of temporary roads. I think using a maximum mileage open at any one time is a more effective and flexible description.
7. During layout and design of salvage projects that will not be conducted through the WRLTSC, plan for the opportunity to remove biomass materials to the extent environmentally possible. WRFP would be interested in working with any successful bidder on such areas to remove tops, non-merchantable materials, and small trees not required to be returned to harvest areas. This planning typically requires consideration for:
	1. Access for chip vans, such as widening of corners, road grade, etc.
	2. Unless materials are decked along the road corridors, larger landings are required for grinding, perhaps up to 2 acres in size, to allow room for the grinder to work and chip vans to turn around.
	3. WRFP would be happy to work with your planning staff during project design to determine if grinding can be successfully implemented.
8. Design criteria, if too stringent or complex, can make a project less economically feasible.  For Example:
	1. Because time is of the essence during salvage operations, do not put excessive or unnecessary timing restrictions within project contracts.
	2. Further, if weather conditions allow during any individual year, allow operations beyond the normal operating season.
	3. Additionally, if wildlife timing requirements are needed, allow operations to continue unless the target species are actually using the area in significant numbers. (We have worked with the Forest Service with good success to do this type of exemption on the WRNF in the Silverthorne/Frisco/Breckenridge area.)

I appreciate the opportunity to make comments on this proposed project and applaud the Forest Service for undertaking this planning effort so quickly following the fire. Please keep me informed as the process moves forward. If I, or West Range Forest Products, can be of any further assistance during this process, please let me know.

Sincerely,

Chuck

Frank C. Dennis

Forester & Contracts Administrator

West Range Forest Products, LLC