



Intermountain Forest Association

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December 27, 2018

Kevin Warner, Acting District Ranger
c/o Christopher McDonald
PO Box 309
Carbondale, Colorado 81623

SUBMITTED VIA ONLINE: <https://cara.ecosystem-management.org/Public/CommentInput?Project=55031>

SUBJECT: Basalt Mountain Salvage and Rehabilitation Project

Dear Mr. Warner:

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. We also advocate for responsible use of our National Forests and believe that salvaging of dead and drying material from wildfire and insects and disease is very important. Given that several of IFA's members heavily rely on timber output from the White River National Forest, we are excited about the proposed Basalt Mountain Salvage and Rehabilitation 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 Basalt Mountain Project and your initiative to not only salvage acres affected by the Lake Christine wildfire, but to also create defensible space and to revegetate the area as needed. As more and more acres burn across Colorado, it is important that these areas be rehabilitated as soon as possible to help prevent post-fire flooding and to reestablish vegetation for habitat. Given these conditions, we concur with the Purpose and Need for Action, and the Proposed Action as stated on pages 3-9. Additionally, we appreciate that the document highlights the added benefit of road and trail maintenance and improvement work.

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, specific silvicultural treatments and the road network. This is especially true for the salvaging of burnt material. Some prescriptions, such as tree planting and hand thinning 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.
- 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 especially pleased to see this project potentially using the exemptions under the Colorado Roadless Rule to treat acres in the Basalt Mountain A Roadless Area. The circumstances surrounding the Cattle Creek area is exactly why those exemptions exist and we feel it is important for the public to see work being done responsibly in those areas.
- 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 Basalt Mountain 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