



Intermountain Forest Association

2218 Jackson Blvd, Ste 10, Rapid City, SD 57702
605-341-0875 Fax 605-341-8651

December 27, 2018

Richard Truex, Acting District Ranger
c/o Brett Crary
PO Box 109
Minturn, Colorado 81645

SUBMITTED VIA ONLINE: <https://cara.ecosystem-management.org/Public//CommentInput?Project=53148>

SUBJECT: Muddy Pass/Sheephorn Project

Dear Mr Truex:

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 Muddy Pass/Sheephorn Project on the Eagle/Holy Cross Ranger 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 Muddy Pass/Sheephorn Project and your initiative to actively increase age-class and structural diversity within the project area to improve forest resilience. We also support managing dwarf mistletoe within the young lodepole pine stands. 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 and are free from disease in order to be more resilient. Given these conditions, we concur with the Purpose and Need for Action, and the Proposed Action as stated on pages 3-11. Additionally, we appreciate that the document highlights the added benefits that will be achieved if this 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, precommercial thinning, and range improvement 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.
- 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.
- Lastly, we fully believe this project can be adequately analyzed through an Environmental Analysis (EA) and does not need a full Environmental Impact Statement (EIS). Completing an EIS is very expensive and can take much longer, ultimately delaying the critical work that this project is hoping to accomplish.

We appreciate your consideration of these comments and suggestions as you move forward with the planning of the Muddy Pass/Sheephorn 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