



# Intermountain Forest Association

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January 31, 2019

White River National Forest  
Attn: Shelby Limberis  
PO Box 190  
Minturn, Colorado 81645

SUBJECT: Forest Health and Fuels Management 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 Forest Health and Fuels Management Project that will occur throughout the Forest. 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 Forest Health and Fuels Management Project and your initiative to improve forest health and maintain prior vegetation management treatments. As our forests face increased pressures from climate change, it is crucial that our forests be managed so as to improve individual tree growth, vigor, and resiliency. Sadly, we have seen the results of overdense forests and their susceptibility to insects and disease and catastrophic wildfire. With the current level of regeneration in places across the forest, the best way to achieve a healthy, resilient forest is through reducing overall tree density with thinning.

We are also very excited and supportive of the plan to maintain the existing fuel breaks within the WUI and enhancing tree diversity through maintaining and protecting planted spruce trees. With the cost of forest treatments being fairly costly and the overall government budget for such treatments continuing to decline, it is crucial that we maximize the work that has already been completed by properly maintaining it over time. Fuel breaks that are in place to protect the community become useless over time without maintenance. The same is also true for planted

seedlings. If, over time, they are outcompeted by less desirable species, the initial investment is lost.

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. Although this project will likely produce very little commercial volume for our existing sawmill industries at this time, it will produce fuel for the biomass plant in Gypsum. Furthermore, this project ensures that a healthy forest will be available long-term for our existing industries. As you move forward, we ask that you consider the following:

### **Detailed Comments – Proposed Actions**

- IFA members vary significantly in the businesses they run and the materials they can utilize. Since most of this project is thinning of smaller, non-commercial material, it is highly likely that this work will need to be accomplished through stewardship and/or service contracts.
- Because this project is spread across the forest, some of the project units may end up being very small in size. While this is likely not an issue for the hand thinning units, it may be difficult to implement cost effectively for those units where heavy equipment is necessary.
- Keep in mind that road maintenance (blading, drainage, and surfacing), the reopening of level 1 roads, and road construction can be very expensive. Therefore, those costs should be either included within the project and the contractor be compensated, or dealt with prior to the contract being awarded. Furthermore, temporary roads can be very expensive and should be minimized as possible.
- As each project develops during the implementation process, we ask that you carefully consider any resource specialist recommendations in terms of required design criteria and determine whether it is actually needed or whether concerns can be met through implementation contracts.
- Lastly, we fully believe this project can be adequately analyzed through a Categorical Exclusion (CE) and does not need the additional documentation of an Environmental Analysis (EA) or Environmental Impact Statement (EIS). This is exactly the type of project that should be analyzed using a CE.

We appreciate your consideration of these comments and suggestions as you move forward with the planning of the Forest Health and Fuels 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 Manger