



Intermountain Forest Association

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September 30, 2019

Brian Ferebee, Objection Reviewing Officer
USDA Forest Service, Rocky Mountain Region
1617 Cole Boulevard, Building 17
Lakewood, CO 80401

SUBMITTED VIA E-MAIL: r02admin_review@fs.fed.us

SUBJECT: Rio Grande Forest Plan Revision Objection

Dear Mr. Ferebee:

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 Rio Grande National Forest, we have been very involved with the Forest Plan revision, offering comments and suggestions throughout the entire process. Therefore, having standing as outlined in 36 CFR part 291 subpart B (219.50-219.62), we submit the following objections to portions of the Rio Grande National Forest Land Management Plan, the Final Environmental Impact Statement (EIS) and the Draft Record of Decision:

Rio Grande National Forest Land Management Plan

Chapter 2 – Forestwide Direction

Species of Conservation Concern –

- DC-SCC-2 only lists late seral forests, when in fact several species also rely on young seral forests. We object as we feel both early and late seral forests are important for forest management and habitat, and should be listed as a desired condition.
- G-SCC-2 - We object to this guideline as we find it to be very broad. We request this guideline be reworded to say – “....roads and other permanent ground-disturbing structures and other authorized activities should not degrade

vegetation within 100 feet of where plants that are listed as species of conservation concern *are present.*” Since many of the plants have broad habitat classifications, restricting operations in areas where they are known to occur but are not present is infeasible.

Vegetation Management –

- Again, we object that early seral habitats are not listed as a key ecosystem characteristic. Many species rely on young forests. Since there is a desired condition (DC-VEG-3) for all development stages to be well represented, we request early seral habitats be included as a key ecosystem characteristic.
- OBJ-VEG-5 – we object to limiting the average timber sale quantity in years 4-20, especially when the Sustained Yield Limit is considerably larger. We insist that modeling of the projected timber sale quantity under an unlimited budget and consistent with all plan components be completed to determine an average annual volume output for years 4-20 and that number be included within this objective with the following footnote: “Estimates of timber outputs may be larger or smaller on an annual basis, or over the life of the plan, if legal authorities, management efficiencies, or unanticipated constraints change in the future.

Appendix D – Species of Conservation Concern Presence and Concern for Persistence

Townsend’s big-eared bat –

- We object to keeping Townsend’s big-eared bat on the SCC list based on a threat that is currently not even detected within Colorado, especially with measures in place to protect bat roost and maternity sites.

Rio Grande National Forest Land Management Plan Final EIS

Preferred Alternative –

- We support Alternative B modified, with the exception regarding the decrease in the planned timber sale program (see note above). While we agree that most of the salvage will no longer be merchantable for sawn products late in the first decade and the second, there will still be a need to offer up salvage sales for customers who desire logs for log homes and firewood.
- We object to the lack of planned management activity in Spruce-Fir, except for salvage, over the life of the plan. The proposed changes to the Southern Rockies Lynx Amendment gives a bit more flexibility in being able to do some work in the Spruce-Fir.
- Furthermore, we object to not treating Spruce-Fir because according to Table 22, Spruce-Fir also includes Lodgepole Pine. Although not a huge part of the forested ecosystem (4% in Table 38), this species needs to be managed, especially with 70% in the sapling-pole stage.
- We object to removing the Continental Divide National Scenic Trail and the Old Spanish National Historical Trail from the suited based and including a one-half mile buffer on each side of the trail. As stated in Brian Ferebee’s letter dated

December 7, 2017, “most management activities can continue to occur within the trail corridor if they are implemented in a way that is sensitive to the purposes for which the CDT was designed... A high scenic integrity objective within the trail corridor does not preclude timber harvest, rather, it guides planning teams to incorporate design and mitigation measures to minimize short term impacts to scenery....”

Thank you for your consideration. We welcome the opportunity to work with you, your staff, and other stakeholders as we work through these objections.

Sincerely,

Molly Pitts

Molly Pitts
Colorado Programs Manager