



Intermountain Forest Association

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October 11, 2019

Kara Chadwick, Reviewing Officer
ATTN: Objections
San Juan Public Lands Center
15 Burnett Court
Durango, CO 81301

SUBMITTED VIA EMAIL: SM.FS.r02admin-rev@usda.gov

SUBJECT: Lone Pine Vegetation Project

Dear Ms. Chadwick:

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 San Juan National Forest, we are very supportive of the Lone Pine Vegetation Management project on the Dolores District. Recognizing the importance of being involved with the process, IFA submitted comments on both the 1st and 2nd draft of the Environmental Assessment. Therefore, having standing as outline in 36 CFR Part 218, subparts A and B, we submit the following objections to portion of the Draft Record of Decision and the final Environmental Assessment:

Environmental Assessment

2.2.1 – Tree Cutting and Removal

- We object to the basal area prescriptions as outlined in the final EA and the Draft Decision Notice. As we previously commented, we recommend the tree removal prescriptions be based on site index, rather than just a general range. We request that on good growing sites (high site index), the retained basal area be closer to 80 square feet of basal area per acre across each stand. On lower site index sites, request only cutting down to 50-60 square feet of basal area per acre.

2.2.5 Design Elements

- Fuels
 - We object to Fuels #5 as written due to the potential of inconsistency. We request a standard slash disposal policy for all project areas be developed.
- Wildlife
 - We object to Wildlife #2 and #3. We find these two design criteria to severely limit spring and early summer logging operations, which is crucial in Ponderosa Pine areas for several reasons (beetles, fire restrictions, etc.). For request these two design criteria be modified to allow greater flexibility.

5.2 – Appendix B – Monitoring Checklist and Adaptive Management Actions

- Table 6 – Adaptive Management Actions Common to All Treatment Types
 - Noxious Weeds
 - We object to the proposed adaptive management action for noxious weeds as written as it is not clear how it will be implemented on the ground or how it will affect sales once they have been sold. We request additional clarification be discussed and potentially added to ensure this adaptive management action is feasible on the ground.

We forward to working with you to resolve the issues discussed above as you move forward with the Lone Pine Vegetation Management Project.

Sincerely,

Molly Pitts

Molly Pitts
Intermountain Forest Association
Colorado Programs Manger