



Intermountain Forest Association

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

February 20, 2020

Matthew McCombs
Attn: Pam King
Gunnison Ranger District
216 North Colorado
Gunnison, CO 81230

Subject: Wilder-Highland Mountain Pine Beetle Response Project

Dear Mr. McCombs:

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 many of IFA's members heavily rely on timber output from the Grand Mesa, Uncompahgre, and Gunnison National Forests (GMUG), we are excited about the proposed Wilder-Highland Mountain Pine Beetle Response Project. On behalf of the members of the Intermountain Forest Association, I appreciate this opportunity to offer comments on the initial scoping, including detailed comments/suggestions on the Proposed Action:

Overall, IFA is very supportive of the GMUG National Forests and their willingness to actively manage National Forest lands to improve forest health and resiliency. For example, IFA has and will continue to actively participate in the SBEADMR and Taylor Park processes, and we are excited that additional work in the Wilder-Highland area will also be treated. After reviewing the scoping documents for Wilder-Highland, IFA concurs with the Purpose and Need for Action, as well as the Proposed Action. That being said, we ask that you consider the following as you continue with planning:

- Proposed sanitation operations will be expensive and will likely need to be achieved through service contracts.
- Commercial thinning can also be expensive and depending on the size of material removed, may not be feasible unless implemented through service contracts.

Detailed Comments – Project Design Features

Beetle Measure

- It may be difficult to execute work before beetle flight in July given the operating restrictions that are proposed March 15-May 15 (Sage Grouse) and December 1st-April 15th (winter range). We recommend building in flexibility, with Line Officer approval, to operate if elk and deer are not in the area.

Water Quality/Soil Productivity

- We disagree with limiting ground skidding to slopes of 35% or less. The current Forest Plan sets the restriction at 40% as do Colorado Best Management Practices.

Wildlife

- As mentioned above, we are concerned with the lack of flexibility for winter logging. Winter logging is crucial for most of Colorado and can be successfully implemented with no resource conflicts if flexibility is built into the process. We recommend building in flexibility to allow for some winter logging if necessary.

We look forward to working with you as you move forward with the Wilder-Highland Project

Sincerely,

Molly Pitts

Molly Pitts
Intermountain Forest Association
Colorado Programs Manager